



Prevention of sexual exploitation, abuse and sexual harassment

Progress Report of the SDC Focal Point PSEAH
October 2019 – December 2020





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1. Introduction

The FDFA is committed to zero tolerance of sexual misconduct by FDFA staff and staff of partner organizations. In June 2019, Switzerland signed the [DAC Recommendations](#) on Ending Sexual Exploitation, Abuse and Harassment in Development Assistance. In October 2019, the SDC Focal Point for Protection from Sexual Exploitation, sexual Abuse and Harassment (PSEAH) started its work. This report presents the progress of the work on PSEAH in SDC over the last 15 months.

The SDC Focal Point (FP) PSEAH is responsible for the definition of processes and measures that support the systematic implementation of PSEAH at SDC head office and by the FDFA representations with an international cooperation mandate; the FP further supports the clarification of internal processes and coherence of PSEAH measures with other entities of the FDFA. The FP also ensures coordination with other donors and international partners. The SEAH cases by SDC partners are reported to the Compliance Office and handled in coordination with FP.

Since October 2019, the FP focused on three areas: a) Reporting and Response Mechanism for SEAH cases of partners; b) SDC staff's knowledge and awareness about PSEAH; c) Coherence of SDC PSEAH mechanism with other actors in FDFA and alignment with other donors.

The outline of the progress in the PSEAH implementation in SDC follows the six pillars which the DAC Recommendations define as crucial elements for the prevention of and response to sexual exploitation, abuse and harassment:

- policies, professional standards of conduct, organizational change, and leadership;
- survivor/victim centered response and support mechanisms;
- organizational reporting, response systems, and procedures;
- training, awareness, and communication;
- international coordination;
- monitoring, evaluation, shared learning, and reporting

2. Context development

2020 was marked by stronger efforts of organizations of international cooperation to strengthen their safeguarding measures.¹ However, COVID-19 has exacerbated the risks of SEAH in the same measure as it has increased the risk of gender-based violence: the lockdown measures of governments have hindered the implementation of projects and have often caused severe constraints for earning a livelihood which in return increased the dependency on aid and aid workers and thus the threat of abuse of power.

Overall, registered complaints increased. And yet, the reported complaints are hardly touching the tip of the iceberg of actual incidents. This was shown by way of example in a report by The New Humanitarian about [sexual exploitation in the DRC during the Ebola Response](#). A UN mission investigated the gaps in the PSEAH system in the DRC and what they reported could stand for most contexts: a huge influx of money combined with a male dominated humanitarian work force enabled the violations. The [report](#) also stated the lack of coordination of reporting and response systems that encompasses all actors including the government as well as the absence of a trustworthy complaint system in beneficiary communities.

¹ Observations by participants of the technical working group, the DAC Reference group on ending SEAH and the standby partner network.

The multilateral partners, INGOs and donors are aware of the gaps and efforts are being made to improve coordination and harmonization of approaches to avoid that partners would have to adhere to different standards for each stakeholder. Joint disclosure schemes and investigation standards are being discussed.

Although a lot of progress has been made, there is still an enormous way to go before safeguarding of staff and target population is achieved.

3. SDC's PSEAH implementation process

- *Policies, professional standards of conduct, organizational change, and leadership*

PSEAH Policy: SDC's zero tolerance against inaction to SEAH is reflected by the Code of Conduct for FDFA staff and the Code of Conduct for contractual partners. Preventing and addressing misconduct by SDC staff is the responsibility of the GS and the DR. Addressing misconduct by SDC partner organizations is the responsibility of the SDC representations in coordination with the Compliance Office and the PSEAH Focal Point. Values, standards and procedures related to PSEAH are defined in different documents. An overall PSEAH Policy does presently not exist.

Over the last 15 months, the FP engaged with the Compliance Office, the Office for Equal Opportunities and the DR to clarify roles and responsibilities. In close collaboration with the Compliance Office, the FP developed the [SDC How-to-Note Addressing Prevention of and Protection from Sexual Exploitation, Abuse and Sexual Harassment \(PSEAH\) in Partner Organizations](#). This document explains the response to incident reporting by partners, the information flow within SDC and SDC's expectations of partners in relation to prevention of SEAH. With the Office for Equal Opportunities and the DR, extensive work was carried out to define overlapping and complementary responsibilities and tools related to training and awareness of staff. The PSEAH FP is of the opinion that an FDFA PSEAH policy should be prepared to pull together already existing documents, directives and guidance and clarify processes, roles and responsibilities of the different entities.

PSEAH sensitive recruitment by the Swiss Humanitarian Aid Unit: The FP supported HR-Feld with the integration of PSEAH-relevant questions and information in the different steps of the recruitment and introduction process of SHA members. HR-Feld has also started integrity testing in their recruitment process which will contribute to prevention of SEAH.

Leadership: Senior management was supported to communicate the message of zero tolerance towards inaction against SEAH on various occasions: integration of PSEAH in the Partner Risk Assessment in June 2020; launch of PSEAH How-to-Note in August 2020; video communication in November 2020 at the beginning of the 16 Days of Activism against GBV and as chair of the film event on International Men's Day. At the department and division level, the management actively engaged with and supported the messages of the FP presentations.

Culture change: To initiate and foster culture change at SDC, the FP has put a special focus on men as target group for reflections on PSEAH. First discussions were held with a group of 10 men who will act as resource persons for "barber shop discussions" about men's personal reflections on gender and PSEAH. As such discussions are easier face-to-face, this barber shop initiative will start as soon as the COVID-situation allows in 2021. Around 50 interested men and women from SDC HQ participated in the film screening on the occasion of the International Men's Day in November 2020; the film was followed by a men-only discussion on gender roles and gender transformation.

- *Survivor/victim centered response and support mechanisms*

Relevance: A survivor-centered approach prioritizes the safety, rights, needs, wishes and empowerment of survivors of SEAH. This requires clarity about the response to and care for staff faced with sexual misconduct and adequate support services. If such processes are unclear or inadequate, survivors will not have sufficient trust to report violations. All organizations are faced with the challenge of underreporting by staff and very little to no reporting by beneficiaries. The biggest challenge is building a reliable and trustworthy system for reporting by and support of beneficiaries. The FP has engaged in discussions and reflections with partner organizations and other donors. These discussions will have to be continued in 2021 with the aim to support selected partner organizations and Swiss representations to develop good practice.

Duty of care for SHA members: The FP has engaged with the PSEAH workstream of the Standby Partner (SBP) Network² to review how other deploying organizations shape reporting of incidents and how they understand their responsibility for investigation and support of the affected roster members. On behalf of the SBP Network, the FP has put together information on what hosting organizations expect from the deploying organizations. Regular PSEAH briefings and debriefings with SHA members before and after deployment sensitized them for their role and responsibility and encouraged them to take action if confronted with SEAH during their contract period. These conversations contributed to the understanding of how host organizations address the topic. In 2021, the PSEAH briefings /trainings for SHA members will be further refined and HR-Feld will be supported in building a case management system that ensures that SHA members are supported when faced with SEAH in the host organization.

- **Organizational reporting, response systems, and procedures**

Reporting and response process to partner misconduct: To anchor PSEAH in SDC, the FP invested in the clarification of processes and the development of guidance documents and tools. According to the *Code of Conduct for Contractual Partners*, all misconduct has to be reported to the Compliance Office. The *SDC How-to-Note Addressing Prevention of and Protection from Sexual Exploitation, Abuse and Sexual Harassment (PSEAH) in Partner Organizations* outlines the basis for decisions by SDC on how to proceed after such reporting. The *Information Flow Chart* in the How-to-Note indicates the type of information required and the responsibilities for the communication about the case in SDC.

Unified Whistleblowing Platform under the responsibility of the Compliance Office: In October 2020, the concept for a web-based platform for reporting violations and irregularities (whistleblowing) was approved by the directorate of FDFA. With the new web platform, which is scheduled to go online in the autumn of 2021, the anonymity of the reports and access will be better guaranteed than with reporting by email. The new platform will include all complaints including on bullying and sexual misconduct. The Compliance Office will conduct a triage and refer the cases to the respective responsible units.

Role of Compliance Office and FP in incident reporting: The Compliance is the entry point for PSEAH complaints and makes the first assessment of the situation. The Compliance Office involves the FP systematically in order to advise and support the representations and the concerned programme officers and divisions in collecting and communicating the required information. After consultation with FP and the concerned division, the Compliance Office proposes the adequate response to the division and the directorate.

PSEAH risk analysis: In order to work towards prevention of SEAH, the SDC Director General communicated the inclusion of PSEAH into the Partner Risk Assessment which is carried out before signing contracts with new organizations in June 2020. The FP prepared the accompanying [Background Paper](#) to provide guidance on how to engage in a PSEAH dialogue with partner organizations and support them in elaborating an action plan to close the gaps. As the PRA is normally only carried out for new partners, the FP is in the process of developing a questionnaire for all partner organizations of SDC to assess their PSEAH system.

Dialogue with institutional partners: According to the above mentioned How-to-Note, PSEAH is now a standing item in the institutional dialogue with multilateral partners and with other institutional partners such as the Swiss organizations. The FP is in regular dialogue with the Division Institutional Partnership and learns from the support that IP provides to Swiss partners for the strengthening of their respective PSEAH systems. The FP still has to systematize the interaction with the SDC desks for institutional partners in order to be aware of and when necessary contribute to the PSEAH dialogue. The fact that UN Funds and Programmes report and certify SEAH allegations annually to their Boards, and to the UN Secretary-General, alongside updates on strategies, actions, resources and partnerships, is a result of donors using their collective leverage (see below: International Cooperation). In the case of the World Food Programme, the Swiss Mission in Rome was very active in the «Joint Working Group Board and Management for Harassment, Sexual Harassment, Abuse of Power and Discrimination». The Swiss Mission in Geneva participates regularly in integrity briefings of major Humanitarian partners such as UNHCR and ICRC. The FP together with the Compliance Office has organized an exchange with the safeguarding offices of MSF, UNHCR, IFRC and IASC. As a follow-up, IASC has asked SDC to organize the donor briefing on the findings of the UN mission to the DRC in November 2020.

² The Standby Partnership (SBP) is a network of bilateral agreements between SBP partner organizations and UN agencies and was established in 1991. The SBP partners provide the UN agencies with gratis personnel to support different emergencies and sectors. For such deployments, the individual SBP partners maintain their own roster of humanitarian experts who are called upon to fill staffing needs and gaps in UN operations. The SBP Network established the Standby Partnership (SBP) Duty of Care Working Group (DoC WG) to ensure a coordinated approach on Duty of Care towards personnel for Standby deployments to UN agencies.

- **Training, awareness and communication**

Visibility: SDC's commitment to zero tolerance must be visible to staff and stakeholders. The FP created a *PSEAH logo* and *posters* that can be adjusted to contexts and languages of Swiss representations. This material can be downloaded from the [SDC PSEAH Shareweb](#). The Shareweb provides an introduction to PSEAH and to FDFA's/SDC's position and normative documents; it offers instructions and guidance for the prevention of and response to SEAH and provides access to relevant international policies and good practice examples. The FP has provided introductory sessions to PSEAH to all divisions of Humanitarian Aid and supported the integration of PSEAH-slots in the introductory trainings for SHA members and in selected trainings of thematic SHA expert groups. PSEAH presentations were made to the South Cooperation Department and the Cooperation with Eastern Europe. The FP also supported SDC staff who wanted to present PSEAH to their respective teams. Furthermore, PSEAH modules were included in the *IZA days 2019*, in the virtual *Ausreiseseminar 2020* (April 2020) and the virtual *H-Seminar* (September 2020).

Training and awareness tools: Significant effort was invested into the creation of the training and awareness tool *Fit for PSEAH*. The FP together with HR-Feld and the professional theater group 'Kuckuck' created a *forum theater*.³ It is based on 3 different SEAH situations and invites the audience to reflect on the issues and to discuss the responsibilities of team colleagues and management as well as the obligations and procedures when misconduct is observed or reported. Due to COVID-19, several scheduled live-performances of the forum theatre for HQ-staff and SHA-members had to be cancelled. The FP therefore decided to create a video tool of the forum theater which can be used virtually as well as in representations to train SDC staff and partner teams. The video tool is available with an accompanying moderation/discussion guide in three languages (English, French and Spanish).

Champion Offices: To test the PSEAH guidance and tools and for capacity building in the representations, the PSEAH Champion Office concept was developed. Five offices are presently engaging in this process: DRC, Myanmar, Bangladesh, South Sudan and Moldova. They each identified a PSEAH focal point. As the five representations are at different stages of awareness and implementation, the regular exchange of experience among the focal points is enriching for all of them as well as for the FP at HQ. In December 2020, these focal points, together with a member of their respective management, participated in a virtual training with the forum theater video tool. The FP will continue to support the representations in building team awareness, carrying out PRAs and communication about PSEAH with partner organizations. The roll out of PSEAH in pilot representations has been slowed by COVID-19 as the teams were busy with adjusting working modalities and the programme. It is expected that the PSEAH will pick up speed in 2021. Additional representations have recently expressed their interest to be part of the Champion group.

- **International Coordination**

Participation in international working groups: The FP participated in the following groups with the aim to contribute to international coordination, harmonization of processes and shared learning:

- ✓ **DAC Reference Group on Ending SEAH:** The group discusses issues related to the implementation of the DAC Recommendations (e.g. language in contracts; issues related to the setting up of institutional standards and policies; good practice in awareness creation and capacity building, etc.). Efforts are made to harmonize and coordinate, also with INGOs;
- ✓ **Technical Working Group (TWG):** This group under the leadership of UK, Netherlands and US, has developed PSEAH language for Revised Standard Administrative Agreement for Multi Donor Trust Funds and One UN Funds which has also been integrated into the templates used by SDC. 15 donors sent a joint letter to the UN Chief Executives Board (CEB) and received a positive response from the UNSG. The UNSG welcomed coordination by donors but some ambiguity remains about how the UN will move forward in updating their bilateral agreements. Reporting by the UN organisations through the UNSG's online reporting portal remains a key issue, given expectations that UN will push to use this rather than reporting directly to donors Whilst the mechanism is an important accountability tool it does not cover all donor reporting requirements (see chapter 4). The Compliance Office participates in a donor safeguarding investigations group, set up by the TWG.
- ✓ **Standby Partner Network:** The SBP has a work stream on PSEAH with the aim to harmonize of procedures and processes for the preparation of secondments and the support for roster members who are faced with SEAH while deployed. The aim is to provide the PSEAH elements to include the MoUs between deployment and host organizations.

³ The **aim of forum theatre** is to explore real practice scenarios in a way that empowers staff to rehearse solutions and change the outcome of a scenario for the better. It is a form of interactive drama and fosters sustainable learning experiences.

- **Monitoring, evaluation and shared learning**

Monitoring/reporting: Cases have been documented by the FP and the Compliance Office; a regular dialogue with the Compliance Office has supported learning and will lead to a more systematic documentation of cases based on the unified whistleblowing platform that will be launched in 2021. The Compliance Office reports biannually to the SDC Directorate and the Head of Department about irregularities including SEAH cases. This reporting system will be reinforced with the implementation of the whistleblowing platform. Indicators for the monitoring of PSEAH implementation by the representations will be identified and launched with the broader roll-out.

Shared learning: The Champion Office concept is a shared learning approach. In addition, based on the regular exchanges with the Institutional Partnership division which supports Swiss partners to establish PSEAH systems, the FP has integrated learnings into the Partner Risk Assessment process (joint formulation of the PRA background document; adaptation of a questionnaire to assess the PSEAH systems of existing partners).

4. Management of cases

SDC received reports of about 14 cases of SEA from or about partner organizations. In 9 cases, the person suffering from SEA was a staff member of the partner organization or of one of their sub-contractors. In 3 cases, the victims were members of the target population and in 2 cases, the victims were staff and beneficiaries.

The response by the partner organizations was satisfactory in 12 cases: the partner organization outlined how they will do the investigation and that they will support the survivors with necessary measures. One case is still pending. 2 cases were reported by the media. One of them was about sexual exploitation in the DRC by staff of several UN organizations and INGOs; it was followed by a high level inter-agency mission to identify how the aid system in Eastern DRC could better prevent SEA and respond to it.

Eleven cases concerned INGO partners, while three cases were reported by multilateral partners. The Norwegian Refugee Council (NRC) reported three cases; it is to be assumed that the better the PSEAH mechanism, the more cases will be reported by an organization – at least initially. It is therefore important that SDC will continue the dialogue with the partners and encourage them to improve their systems and to report cases.

The PSEAH focal point and the Compliance Office worked very closely together. The final decision how SDC should respond to the information has always been made by the Compliance Office. The focal point has supported the concerned desks to prepare the information to the directorate and the communication with the reporting organization.

The UN agencies are uploading information about SEA on a [public incident reporting platform](#). However, from this platform it is impossible to know whether the reported case refers to a project funded by specific donors. The Technical Working Group (TWG) of the Donor agencies have been engaging with the UN on how the information flow could be ensured but without clear results to date. The TWG continues discussions to identify solutions that address the need for information about cases.

5. Conclusion and Outlook

PSEAH has gained visibility and traction in SDC. In the past 15 months, relevant guidance and communication tools were produced and launched by senior management. PSEAH has stirred much interest at the Head Office and in the representations but has also raised many implementation related questions. In order to systematically implement the PSEAH measures up to the field level, the FP has started an exchange and learning process with presently five PSEAH Champion offices. In 2021, the number of representations assisted by the FP to introduce PSEAH measures and engage in sharing experience will be increased.

Collaboration between different entities in FDFA addressing sexual misconduct has started. The FP and the Compliance Office work together on a regular basis; discussions with DR and GS have created a better understanding of how the mandates and tasks of different FDFA entities complement each other. The Compliance Office will launch a unified FDFA whistleblowing platform in autumn 2021. Coherence and cooperation within FDFA will be achieved through regular joint reflections and the preparation of a FDFA PSEAH policy in 2021.

International exchange and learning: The FP's participation in international technical working groups will continue to ensure that SDC's measures are in line with best practice and contribute to the creation of a harmonized approach to PSEAH by international partners.

Documentation and learning from reported incidents of SEAH will remain an important task of the FP. While 14 reported cases in 2020 is not much, it is a steep increase compared to earlier years and indicates that SDC's partner increasingly established PSEAH mechanisms. However, based on for example of the recent report by The New Humanitarian about sexual exploitation in the DRC, it must be assumed that still only very few victims ever make a complaint. Hence, it is important to further intensify the assessment of partner's mechanisms and if required to support them in strengthening it. For survivors to feel safe and confident to report, it will be crucial to establish and improve reliable community-based complaint systems. The FP will explore with representations and partners how to develop better practice.

It is all about culture change. PSEAH measures will only be really effective if they are anchored in organizational culture change. Sexual exploitation, sexual abuse and sexual harassment are a form of gender-based violence, anchored in patriarchal norms and attitudes and the enormous power imbalances in international cooperation. Efforts for PSEAH need to be linked with a clear organizational commitment against GBV and for gender-equality. With a forum theater on SEAH and discussions among men in barber shops and at the International Men's day, reflections on gender norms have started. Targeted messaging by senior leadership have supported these efforts. However, culture change is a long process and requires continuous engagement at all levels of the organization.

Plans for 2021: In 2021, the FP will focus mainly on:

- Strengthening coherence within FDFA
- Rolling out implementation to the field level
- Continuing efforts for culture change within SDC

The FP will actively engage in the PSEAH Policy development process and in the preparation of the whistleblowing platform and will contribute to the further development and harmonization of a PSEAH training concept and toolbox for FDFA. A major effort will focus on making representations fit for PSEAH and to support their pro-active dialogue on PSEAH with partner organizations. For the SHA Unit, the FP will contribute to the building of a solid response mechanism with an emphasis on a survivor-centered approach. The survivor-centered approach and the development of good practice for trustworthy reporting mechanism in communities will be supported in selected representations and communicated broadly. Finally, continued efforts for male engagement for PSEAH and strong messaging on leadership level will allow next steps of culture change within SDC.

For 2021, the aim is to secure 1 full FTE for the PSEAH Focal Point. The contribution by the Gender/GBV Focal Point will be 40% while 60% will be covered by the SHA secondment.

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