LESSONS IN MULTILATERAL EFFECTIVENESS

Progress on PSEAH? From Words to Deeds

REPORT

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Progress on PSEAH? From Words to Deeds

Lessons from MOPAN's 2020-22 assessments on protection from sexual exploitation, abuse, and harassment

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The Multilateral Organisation Performance Assessment Network (MOPAN) comprises 22 members[1] sharing a common interest in improving the effectiveness of the multilateral system. MOPAN commissioned this analytical study to build upon its well-established performance assessments, adding value by offering a contribution to system-level learning about Sexual Exploitation Abuse and Harassment (SEAH). This study is part of the series, "Lessons in Multilateral Performance" being conducted by MOPAN on a range of salient topics related to the multilateral system.

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1   MOPAN members as of 01 January 2023: Australia, Belgium, Canada, Denmark, Finland, France, Germany, Ireland, Italy, Japan, Korea, Luxembourg, the Netherlands, Norway, Qatar, Spain, Sweden, Switzerland, the United Kingdom, and the United States. MOPAN works closely in collaboration with the European Union and the Republic of Türkiye as an observer.

ACKNOWLEDGEMENTS

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ABBREVIATIONS & ACRONYMS

CBCM	Community-based Complaints Mechanism
CEB	Chief Executives Board (United Nations)
CSO	Civil Society Organisation
GA	General Assembly (United Nations)
GBV	Gender-based Violence
GHRP	Global Humanitarian Response Plan
HQ	Headquarters
IASC	Inter-Agency Standing Committee
ILO	International Labour Organisation
ILOITC	ILO International Training Centre
MDB	Multilateral Development Bank
MI	Micro-indicator
MOPAN	Multilateral Organisation Performance Assessment Network
NGO	Non-governmental Organisation
OCHA	United Nations Office for the Coordination of Humanitarian Affairs
OIOS	UN Office for Internal Oversight Services
PSEAH	Protection from Sexual Exploitation, Abuse, and Harassment
QA	Quality Assurance
SEA	Sexual Exploitation and Abuse
SEAH	Sexual exploitation, Abuse, and Harassment
SH	Sexual Harassment
SG	United Nations Secretary-General
SOP	Standard Operating Procedures
UN	United Nations
UNCT	United Nations Country Team
UNDP	United Nations Development Programme
UNEP	United Nations Environment Programme
UNICEF	United Nations Children's Fund
UNOPS	United Nations Office for Project Services

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EXECUTIVE SUMMARY

In 2020, the Multilateral Organisation Performance Assessment Network (MOPAN) introduced a new component to its methodology for measuring organisational performance by adding requirements related to Protection from Sexual Exploitation, Abuse and Harassment (PSEAH). MOPAN's work in this area contributes to international efforts to monitor progress on the commitment to do no harm and to protect the vulnerable in development and humanitarian work. By introducing explicit indicators of performance, MOPAN helps bring about consistency and transparency in these efforts.

About this study

This synthesis study provides an overview of findings so far from the first assessments of UN agencies that MOPAN undertook using the PSEAH benchmarks in 2020-21. It aims to summarise how far these organisations have come in tackling PSEAH, to understand their challenges, and to identify good practice. The six UN agencies are the: International Labour Organization (ILO), Office for the Co-ordination of Humanitarian Affairs (OCHA), United Nations Development Programme (UNDP), United Nations Environment Programme (UNEP), United Nations Children's Fund (UNICEF), and the United Nations Office for Project Services (UNOPS).

Key findings on PSEAH in MOPAN assessments

Although the study is based on only six organisations and its findings cannot be generalised, it did reveal several noteworthy patterns of performance on protection from SEAH. These are grouped into three categories of those common to both areas, and those specific to SEA or to SH (Figure 1).

Figure 1: Issues and common patterns for protection from sexual exploitation, abuse and harassment

SEA-specific issues

Agencies do well in reporting cases

Due diligence regarding implementing partners is uneven

Interagency coordination needs to expand from HQ to the field

Poor performance tracking progress on implementing SEA policy, action plans, and risk management

Need for tangible action in taking a victim-centred approach

Common patterns

Organisational policies, action plans, codes of conduct in place

PSEAH training is mandatory and completion rates are good

Having dedicated structures for PSEAH remains a challenge

SH-specific issues

SH complaints not always addressed in a timely manner

SH cases and follow-up measures not yet transparently reported, including to personnel and inter-agency mechanisms

Many organisations lack multiple structures for receiving and responding to SH complaints that are adapted to victims' varying needs

Poor performance tracking progress on implementing SH policy

Note: Summary of findings

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Emerging PSEAH performance patterns

- ⊘ The six assessed organisations all have **organisational policies, action plans or codes of conduct regarding PSEAH in place.**

- ⊘ All have **mandatory training** in place as a measure to prevent SEA and SH and good evidence of completion rates.

- ⚠ Having **dedicated resources and structures** for PSEAH, especially at field level, is a difficulty for SEA and SH. Only two of the six agencies had some dedicated resources at both headquarters (HQ) and field levels.

- ⚠ A major weakness across all assessed organisations is **tracking SEA and SH policy implementation**. While all track the number of allegations and the nature of responses to them, they do little to monitor actual progress against organisational policies and action plans.

Patterns specific to sexual exploitation and abuse

- ⊘ The **reviewed UN agencies** do well in **reporting allegations transparently** every year, thanks to the common system instituted by the UN Secretary-General's annual reporting on special measures to tackle SEA.

- ⚠ There are great differences in the degree to which organisations carry out **due diligence in vetting implementing partners** and building their capacity to protect from SEA, but some good practice is emerging.

- ⚠ **Co-ordination among agencies** on SEA needs strengthening. In practice, involvement in such initiatives is linked to organisational mandates and obligations. There is more engagement at HQ than at field level. However, such inter-agency cooperation and synergies are crucial given the nature of SEA and of resource constraints.

- ⊘ A weakness across all assessed organisations is the **implementation of risk management** strategies relating to SEA.

- ⚠ Adopting a **victim-centred approach** is still a challenge. Beyond commitments, most organisations were unable to demonstrate tangible action. This dovetails with the findings of the Inter-Agency Standing Committee (IASC) evaluation (2021).

Patterns specific to sexual harassment

- ⚠ Ensuring that SH complaints are **handled in a timely manner** is an area of attention; only one or two organisations lead the way. The ability to better respond to misconduct requires significant investment.

- ⚠ While **public reporting** on SEA is advanced in the UN system, it is poorly co-ordinated on SH and organisations fare differently. Some take it upon themselves to report publicly whereas others choose to keep matters internal.

- ⚠ Many organisations lack the **t** to SH concerns. Offering a choice of mechanisms is important to cover the varying needs of victims, which can range from simply seeking advice to getting assistance or lodging a formal complaint.

What are MOPAN's good practice benchmarks on PSEAH?

MOPAN's PSEAH benchmarks draw on international norms and good practices, including the Inter-Agency Standing Committee's (IASC) Six Core Principles and Minimum Operating Standards and the OECD Development Assistance Committee's (DAC) Recommendation on Ending Sexual Exploitation, Abuse, and Harassment in Development Co-operation and Humanitarian Assistance. MOPAN's benchmarks on the prevention of and response to SEAH focus on the presence and application of policy rather than on results.

As a follow-up to this study, MOPAN will continue to explore how PSEAH is being addressed by multilateral development banks, vertical funds and financing mechanisms, considering the specific business models of these types of institutions. Once concluded, this work will help to further fine-tune MOPAN's PSEAH benchmarks and will also make it possible to adapt benchmarks to organisations' different business models.

MOPAN's benchmarks on the prevention of and response to SEAH focus on the presence and application of policy rather than on results. Specifically, MOPAN's good practice benchmarks for PSEAH are contained in its performance area related to organisational systems enabling transparency and accountability. Specific micro-indicators have been dedicated to measure performance on SEA (micro-indicators 4.7 and partly 5.4), and SH (micro-indicator 4.8). In line with the use of terminology in the UN system, the MOPAN indicator on SEA (micro-indicator 4.7) refers to sexual misconduct by agency personnel directed towards community members while the MOPAN indicator on SH (micro-indicator 4.8) refers to sexual misconduct directed towards personnel within the organisation itself. See Table 1, below.

Table 1: MOPAN indicator coverage for preventing sexual exploitation, abuse and harassment

Coverage on sexual exploitation and abuse	Coverage on sexual harassment
⊙ Policy statement (policy, strategy, action, plan, code of conduct) ⊙ Mechanisms to track implementation ⊙ Dedicated resources and structures (capacity) ⊙ Awareness raising/training (culture) ⊙ Implementing partners have clear standards/due diligence ⊙ Contribution to inter-agency efforts ⊙ Action and transparent reporting on SEA allegations ⊙ Victim-centred approach and victim support ⊙ Intervention design and analyses of SEA risk	⊙ Policy statement (action plan is good practice, code of conduct) ⊙ Tracking implementation, e.g. reporting to board ⊙ Clearly identifiable roles, structure, and resources ⊙ Multiple mechanisms for victims/survivors to report/seek advice ⊙ Timely and effective response ⊙ Transparent reporting to boards and interagency

Note: Adapted from MOPAN methodology, Micro-indicators 4.7, 4.8 and element 5.4.5.
Source: MOPAN Metholodogy 3.1

How was the study conducted and how will MOPAN use it?

The study was carried out through an in-depth documentary analysis of the assessment reports of the six UN bodiesconcerned and a review of MOPAN guidance and other materials. The synthesis report provides findings about substantive progress on PSEAH across agencies as well as observations on process and methodology. These aspects and the technical-level findings will be considered further in MOPAN's methodological work that will eventually lead to an updated methodology, MOPAN 4.0.

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INTRODUCTION

1.1 Background

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The Multilateral Organisation Performance Assessment Network (MOPAN) is a network of 22 members and observers with a secretariat in Paris. Its members have a common interest in improving the effectiveness of the multilateral system. MOPAN carries out joint assessments of multilateral organisations and analytical studies from a thematic perspective. Members use MOPAN's assessments to meet domestic accountability requirements and to shape their policies as bilateral donors and for learning purposes.

The integration of PSEAH into MOPAN's framework

MOPAN examines organisational effectiveness through four areas of organisational performance: **(i) strategic management; (ii) operational management; (iii) relationship management, and (iv) performance management.** It also assesses the achievement of **(v) results** through document review. The approach and methodology are detailed in the MOPAN 3.1 Methodology. Since 2020, the methodology features a new component that measures organisational performance in protecting from sexual exploitation, abuse and harassment (SEAH). This was a significant change in MOPAN's methodology, undertaken at the request of member states.

This new component of the MOPAN framework was developed through wide consultation with MOPAN members, selected multilateral organisations (United Nations Refugee Agency (UNHCR), World Food Programme (WFP), World Health Organization (WHO) and the World Bank) and 40 international experts and practitioners on PSEAH. MOPAN indicators were designed to align with the six pillars of the DAC recommendation and are in accordance with the IASC Core Standards. The process resulted in MOPAN's Note for Practitioners and a Brief for policy makers (MOPAN, 2021) which in addition to the rationale for these benchmarks, also presents a MOPAN+ toolkit of more granular indicators for use by organisations seeking greater depth in their own assessments.

MOPAN's benchmarks on the prevention of and response to SEAH focus on the presence and application of policy rather than on results/effectiveness. Specifically, MOPAN's good practice benchmarks for PSEAH are contained in its performance area related to organisational systems enabling transparency and accountability, including risk. These benchmarks are summarised in Table 2, on page 17. The full wording of the indicators is located in Annex 1, which provides an in-depth analysis of the performance of assessed agencies. This report refers to the benchmarks in summary form by performance area rather than by indicator number for ease of readability.

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Table 2: MOPAN benchmarks related to sexual exploitation, abuse and harassment

Sexual Exploitation and Abuse	Sexual Harassment
⊙ Policy Framework ⊙ Tracking policy implementation ⊙ Resources and structures for policy implementation ⊙ Training and raising awareness ⊙ Ensuring implementing partners' accountability ⊙ Inter-agency efforts HQ and field ⊙ Action in response to allegations ⊙ Victim-centred approaches ⊙ Risk analysis informs intervention design	⊙ Policy Framework ⊙ Tracking policy implementation ⊙ Resources and structures for policy implementation ⊙ Training and raising awareness ⊙ Multiple mechanisms for advice / reporting ⊙ Action in response to allegations ⊙ Transparent reporting (board, staff, inter-agency)

Source: MOPAN's Note for Practitioners

The first application of MOPAN's PSEAH benchmarks

Over 2020-22, MOPAN assessed the performance and effectiveness of six UN agencies – International Labour Organization (ILO), Office for the Co-ordination of Humanitarian Affairs (OCHA), United Nations Development Programme (UNDP), United Nations Environment Programme (UNEP), United Nations Children's Fund (UNICEF), and the United Nations Office for Project Services (UNOPS). This was first time that an organisation's performance tackling SEAH was an integral part of MOPAN's assessment. Since this component has attracted considerable interest and will be closely scrutinised, MOPAN initiated the exercise to ensure that it learns substantively and methodologically from this first rollout for future assessments.

The six UN organisations and the context of their PSEAH policy standards

Three of the organisations MOPAN assessed, namely OCHA, UNDP and UNICEF, are long-standing members of the Inter-Agency Standing Committee (IASC) where protecting from **Sexual Exploitation and Abuse** has been a recognised responsibility for multilateral organisations since at least 2002, when the when the IASC first issued Six Core Principles Relating to PSEA in response to allegations of widespread sexual exploitation of refugee children by aid workers in West Africa. The UN Secretary-General's Bulletin on Special Measures for Protection from SEA (2003) marked the beginning of a series of guidelines, policies, and protocols, including against retaliation for reporting misconduct (2017), the Victims' Assistance Strategy (2008), the Victims' Assistance Protocol (2019), and the UN Protocol on Allegations of SEA involving Implementing Partners (2018) to name but a few. Despite the IASC's long-term commitment to PSEA, its External Review on the Prevention of Sexual Exploitation, Abuse, and Harassment concluded that while the IASC had consistently made PSEA a priority during the last decade, the pace of progress had not been steady. It found that the IASC had not clearly articulated the changes desired, set measurable targets, or monitored the effectiveness of activities.

The six organisations on which this study focuses have different roles and risk profiles regarding SEA. As long-standing members of the IASC, OCHA, UNDP, and UNICEF began their PSEA and related co-ordination activities earlier than UNOPS, ILO, and UNEP. Although no in-depth analysis was made of these organisations' risk profiles, organisations with a larger interface and more direct interaction between personnel and vulnerable populations are clearly at higher risk of SEA. It is notable, however, that all organisations in the sample -- whether their main activity was humanitarian, development, or normative -- recognised that SEA posed a risk to them.

As the organisations have been measured on a common benchmark, considerations on risk exposure have not changed MOPAN's approach. The differences in the maturity of PSEA are, however, visible.

Sexual harassment as an issue affecting staff within UN organisations gained prominence in the 2010s. A prohibition of SH in the UN Secretariat was issued in 2008.[2] In the UN, it resulted in the establishment of a Chief Executives Board for Co-ordination (CEB) and a CEB Task Force on addressing SH within the UN system in 2017. The 2018 UN General Assembly Resolution and the 2018 UN System Model Policy on SH containing a uniform definition of SH approved by the CEB, were significant milestones. Further, the UN Secretary-General's bulletin on addressing discrimination, harassment, including SH, and the abuse of authority came into force in 2019. It is binding on UN Secretariat entities and includes the Model Policy on SH. The IASC also made commitments on SH, but the IASC review indicated that for most of those consulted it was unclear how those commitments were to be realised.

The six organisations assessed in this sample are thus all part of the CEB and the GA resolution. However, we have not distinguished among the various types of UN bodies (secretariat, programmes, funds, and agencies) in synthesizing the results of the MOPAN assessments.

Member States' and MOPAN's commitment to monitoring progress in PSEAH

Following high profile SEA cases in Haiti in early 2018, several governments initiated or strengthened their work on SEAH. In the autumn of the same year, the UK hosted a summit on tackling SEAH in the international aid sector. Member states that participated in the summit represented 90% of Official Development Assistance (ODA). They made 22 commitments grouped under four strategic focus areas. These commitments included driving the assessment of PSEAH in MOPAN forward and formulating a DAC policy instrument for PSEAH:

- ⊙ **Commitment 13:** Those members of the donor group who participate in the Multilateral Organisation Performance Assessment Network (MOPAN) will support and advance the discussion on enhancing assessment in relation to sexual exploitation and abuse and sexual harassment to help the improved effectiveness of multilateral organisations.

- ⊙ **Commitment 17:** Support the OECD Development Assistance Committee (DAC) to formulate a new DAC instrument that in 2019 will set standards on preventing and managing the risks of sexual exploitation and abuse in development cooperation, and drive donor accountability in meeting them.

Source: Commitments made by donors to tackle sexual exploitation and abuse and sexual harassment in the international aid sector, London, UK, 18 October 2018

In 2018, MOPAN started working towards its PSEAH benchmarks. In July 2019, the OECD DAC Recommendation on Ending Sexual Exploitation, Abuse, and Harassment in Development Co-operation and Humanitarian Assistance was adopted by all DAC members. This recommendation set out a new – and first – set of international standards for member states to apply when working with national aid agencies, civil society, and multilateral organisations, that

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2   ST/SGB/2008/5, Secretary-General's bulletin: Prohibition of discrimination, harassment, including sexual harassment, and abuse of authority,

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is coherent with the IASC Core Principles and refers to existing standards on PSEA (5b and Preamble), namely the IASC Minimum Operating Standards and the Core Humanitarian Standard on Quality and Accountability, requiring signatories to include these in their policy response to PSEAH.

Several other initiatives followed. In September 2020, USAID and The Netherlands launched a virtual Community of Practice on SEAH and employment accountability. The Employment Accountability Roadmap that resulted focuses on five key areas or common challenges. It recommended improved practices in i) capacity building, ii) human resources, iii) investigations, iv) legal affairs, and v) risk management. The initiative is now integrated and continued through the DAC and the implementation of the DAC Recommendation and Action Plan. In addition, in 2021, a number of donors developed "harmonized language" that reflects principles and practices with regard to PSEAH that they expect organisations to respect, which is attached to each contribution agreement concerning what they ask from the UN on PSEAH. The UK government is currently working on a global framework for PSEAH, which is intended to bring together all existing commitments and guidance (including MOPAN assessments) under a single framework that is more broadly applicable than the DAC Recommendation and Action Plan.

In this larger context of PSEAH, MOPAN is well positioned to play a role in monitoring and supporting progress on performance of multilateral organisations in safeguarding against SEAH through its organisational performance benchmarks and assessments.

1.2 Objectives and approach

This synthesis study was undertaken as the first in a series designed to capture lessons from MOPAN's assessments of organisations' PSEAH efforts over 2020-24.

This study seeks to draw lessons from this first roll-out of the MOPAN SEA/SH component to allow MOPAN to feed learning into subsequent assessments. This is essentially a synthesis and meta-analysis of these six assessments. It identifies common trends, patterns, and challenges in tackling SEA/SH and involved documentary analysis using both qualitative and quantitative data.

The study focuses on six UN organisations assessed by MOPAN in 2020-22 and covers ILO, OCHA, UNDP, UNEP, UNICEF, and UNOPS. A second set of lessons will be drawn from the rounds of assessments of multilateral development banks and vertical funds that are currently still underway.

The objective of this study is to take stock of how the six organisations have been implementing the PSEAH agenda and identify areas where performance has been generally satisfactory and where the assessments found challenges.

Following this analysis, MOPAN will explore ways to present its PSEAH-related performance data in a user-friendly way. This will entail determining how qualitative information and indicator scores can best be visualised and represented on MOPAN's Performance Portal, which is currently under development.

Finally, this exercise supports MOPAN's work towards a revised methodology, MOPAN 4.0. The lessons from the application of MOPAN's PSEAH indicators will help identify gaps and any necessary updates to ensure that the indicators are current and represent the best ways to measure performance.

In terms of approach, the study analyses the SEA/SH content of the six assessments of UN agencies carried out over 2020-22. As this was the first time that SEA/SH formed part of the assessment, the MOPAN Secretariat provided considerable guidance to the assessment teams.

1.3 Limitations

The six assessments under review are the first for which MOPAN's PSEAH benchmarks were applied. Therefore, the following caveats are to be kept in mind.

- ⊙ **Period covered:** The assessments were conducted over 2020-22 and thus represent a snapshot of the organisation between those years. They cover the period since the previous assessment, which is generally 4-5 years. The synthesis does not capture subsequent progress made by organisations.

- ⊙ **Lack of baselines:** For this first round of assessments against the PSEAH benchmarks, MOPAN had no baselines from which to work. Guidance was made available by the MOPAN Secretariat but was not always followed with equal thoroughness by assessment teams.

- ⊙ **Capacity constraints:** The observations highlight that the assessment of the SEA/SH component is very complex and time-consuming and that if it is to further the progress of performance in this area, it requires specialist understanding, an expert review of the evidence, and sufficient resources.

- ⊙ **Consistency:** MOPAN was not in a position to extensively quality-assure the PSEAH component. Not all assessment teams had the specialised capacity to do this assessment. Consequently, there are limitations to this analysis regarding the reliability of comparisons among agencies, the adequacy of assessment methods, of scoring, of the sufficiency of data for triangulation, assessment teams' adherence to MOPAN guidance, and definitional issues. Also, given that the assessments were simultaneous and overlapped, it was not possible to calibrate among them during the process.

- ⊙ **Varying SEA risk profiles:** The organisations assessed have different exposure to SEA and are at different stages of maturity on PSEAH, but this does not enter into consideration.

- ⊙ **Type of UN body:** Although the study includes UN Secretariat entities (OCHA), agencies, funds and programmes (UNDP, UNEP, UNICEF), specialised agencies (ILO) and other entities (UNOPS), no distinction, or disaggregated analysis, is made among them. This could be an area of further research.

MOPAN is working to resolve some of these limitations over time, strengthening the quality and reliability of its assessments. This study is part of that effort. Despite these limitations, MOPAN finds the learning from this pilot phase to be useful and is sharing it more widely to assist learning across the sector. MOPAN welcomes feedback on this work and proposals for further improvement.

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OVERVIEW OF PERFORMANCE

In this chapter we provide an overview of the performance trends that we found when looking across the six UN agencies that were assessed against MOPAN's PSEAH benchmarks in 2020-21: ILO, OCHA, UNEP, UNDP, UNICEF, and UNOPS. As noted in section 1.3 on limitations, we base this analysis entirely on the assessments, which reflect the situation at the time they were done. We could not include any subsequent developments.

The third chapter delves deeper into the findings and provides a more granular analysis of performance against specific MOPAN benchmarks, examples of good practice, and areas of challenge.

2.1. Protection from sexual exploitation, abuse and harassment

Common patterns to combatting sexual exploitation, abuse and harassment

- ⊘ All six assessed organisations meet the criterion of having organisational policies, action plans and/or codes of conduct in place on PSEAH.

  - ⊙ **SEA**: All organisations meet the basic requirement to have an organisation-specific dedicated policy, action plan, or code of conduct in place. Some have more developed action plans (UNICEF, OCHA and UNOPS) for field-testing and require action plans from country offices. Whether they are in line with MOPAN's requirement to align with international standards and apply to all categories of personnel is not clearly stated in all assessment reports. But the 2003 UN Secretary-General's Bulletin: Special Measures for Protection on Sexual Exploitation and Sexual Abuse is likely to be applied as the overarching UN policy on SEA since it applies to all UN entities.

  - ⊙ **SH:** All agencies have organisation-specific dedicated policies or codes, although in the case of the ILO, these needed updating at the time of the assessment. Most organisations referred to the 2018 UN Model Policy as the main international standard applicable. The assessments do not always state whether their policies apply to all categories of personnel, nor do they contain much information on how the SH policy is implemented.

- ⊘ All have mandatory training in place for both SEA and SH preventive measures and good evidence of completion rates.

  - ⊙ **SEA**: The available data shows good rates of completion across agencies. ILO was the only organisation that lagged in this respect. However, these completion rates cannot be compared given variables such as the number of personnel and the dates at which completion rates are calculated for the MOPAN assessment. However, at the time of the assessments, all organisations barring ILO demonstrated good rates of completion, and all confirmed that training was mandatory for all categories of personnel.

  - ⊙ **SH:** For most agencies (UNICEF, UNEP, OCHA, UNDP) staff training on SH was mandatory. UNDP, UNEP and UNOPS particularly emphasised training for managers. The UNICEF, UNEP and UNDP reports also include data on training completion rates. ILO has yet to roll out a global training programme to prevent SH.

- ⓘ The lack of **dedicated resources and structures**, especially at field level, is a difficulty for tackling both SEA and SH. Only two of the agencies had some dedicated resources at both HQ and field levels.

  - ⊙ **SEA**: Organisations are at different stages of setting up dedicated structures and resources. UNDP and UNICEF appear to have made the most progress at HQ and country level in this regard. The lack of sufficient resources is a major challenge that the OCHA report emphasises given its inter-agency role globally and in-country. The remaining organisations (UNEP, UNOPS, ILO) are reported to have higher-level structures. In UNEP and ILO, PSEA is integrated into wider frameworks for dealing with behaviour issues. The UNOPS assessment noted its emerging system of field-level focal points. Community-based complaints mechanisms (CBCMs) are also an important inter-agency structure applicable to all agencies working in specific humanitarian operations as highlighted in the OCHA assessment.

▶ **SH:** All organisations had structures at HQ level for implementing SH policies. The UNICEF, OCHA, UNDP, and UNOPS reports specified that a coordinating body had overall responsibility for implementing them. However, there was very little information about country level structures to deal with SH; this was mentioned only in the UNICEF assessment. ILO and UNEP emerged as having the fewest mechanisms and least co-ordination around SH both at HQ and in the field. Only the UNOPS assessment addressed the question of dedicated financial resources, which were found to be lacking. Overall, for different reasons, four agencies did better – UNICEF, OCHA, UNDP, UNOPS – and two – ILO and UNEP – were found to be weaker.

⊘ A major weakness across all assessed organisations is **tracking the implementation of SEA and SH policies.** While all track the number of and response to allegations, they do little to monitor actual progress against organisational policies and action plans.

▶ **SEA**: Although some mechanisms are in place to track the implementation of SEA policy, there is little evidence that they are active. Moreover, those mechanisms that do exist are primarily at HQ level and not in the field. Overall, none of the agencies had any significant achievements to show in this respect. OCHA's case was noteworthy, and the assessment describes systems in place at HQ and at field level to track policy implementation.

▶ **SH:** Some of the agencies (UNDP, UNICEF, UNOPS, ILO) are reported to have mechanisms for tracking the implementation of their SH policy at HQ level. The assessments contain very little information on field level mechanisms. As such, these organisations have not achieved this benchmark.

Patterns specific to sexual exploitation and abuse

⊘ Agencies do well in **transparently reporting** allegations every year. This is not surprising, given that the UN Secretary-General's annual reporting on special measures to tackle SEA has made regular reporting mandatory.

▶ All meet the requirement of public reporting as they feed into the standardised system in line with the UN SG annual reporting on special measures to tackle SEA. Some assessments also list other ways in which agencies publicly report information about allegations and actions taken. However, when it comes to the timeliness of actions, only UNICEF and UNDP demonstrate concrete efforts to improve the speed of their responses.

▶ There are large differences in the degree to which organisations apply **due diligence** when vetting implementing partners. Different organisations take different approaches to building their skills for protecting against SEA, but some good practice is emerging. Standards for carrying out due diligence on partners were established by the 2018 UN Protocol on Allegations of Sexual Exploitation and Abuse Involving Implementing Partners. Some agencies have gone further to reference the obligations of implementing partners in their strategies. All are developing due diligence measures. UNICEF is the most advanced and its assessment provides data substantiating how these standards are being applied. Although not expressly mentioned in the benchmark, some organisations, particularly UNICEF and UNDP, also carry out partner capacity building alongside due diligence. Beyond this, the UNDP assessment specifically highlights the differences and challenges in applying these standards to governmental partners.

⊘ **Agency co-ordination** on SEA needs strengthening. In practice, involvement in such initiatives is linked to organisation mandates and obligations. There is more engagement at HQ than at field level. Yet given the nature of SEA and the resource constraints, such inter-agency co-operation and synergies are crucial.

▶ All organisations participate in inter-agency efforts to some degree. This depends in part on their role in the UN family of organisations where OCHA takes a particular lead on co-ordination. UNICEF has also been very pro-active in engaging with inter-agency efforts. The majority of agencies, with the exceptions of ILO and UNEP, are good at engaging with HQ level initiatives such as UN ClearCheck. Engagement at field level is weaker, including for participating in joint mechanisms such as the CBCMs. Only UNICEF and OCHA provided evidence of inter-agency efforts in the field.

⚠ A weakness across all assessed organisations is the **implementation of risk management relating to SEA.**

▶ Most agencies have considered risk management in relation to SEA but generally have no advanced risk strategies or practices in this regard. UNICEF may be the most advanced among the six. The assessment confirmed that risk assessment in relation to SEA is happening in practice.

⚠ Adopting a **victim-centred approach** remains a challenge. Beyond commitments, most organisations cannot demonstrate any tangible action. This dovetails with the findings of the IASC evaluation (2021).

Patterns specific to sexual harassment

⚠ When it comes to ensuring that complaints of SH are handled in a **timely** manner, only one or two organisations of the six are leading the way. A better response to misconduct will require significant investment in this area.

▶ All agencies commit to timeliness, but only the UNDP and UNICEF assessments provide data to show how they handle complaints in a timely manner. ILO and UNOPS affirm their policy commitments to timeliness but the substantiating information is inadequate: their policies are not comprehensive (e.g., ILO has deadlines for some stages but not for others; UNOPS does not stipulate any deadlines) and in neither case are there data showing how long complaints take. OCHA and UNEP are relying on OIOS to investigate on their behalf and therefore do not control the timeline.

⚠ While public reporting on SEA is advanced in the UN system, **reporting on SH cases is not always transparent or public. Reports are often kept internal and there is little co-ordination** among organisations.

▶ Most assessments describe a reporting process: UNICEF, UNDP, and UNOPS meet the requirement better than the others. These three assessments make it clear that reporting occurs annually. Transparency varies among agencies and seems defined differently by different organisations. The UNICEF, UNDP, and UNOPS assessments explicitly refer to a high degree of transparency in the public reporting of SH cases. By contrast, the ILO assessment report says that the information is kept internal; the OCHA report does not address this point, and the UNEP report concludes that there is transparent reporting without providing further detail. All agencies participate in ClearCheck, a system-wide tool that aims to prevent re-hiring perpetrators (of SEA or SH).

⚠ **Organisations are not yet living up to the expectation** of having multiple structures for counselling or guidance to victims, and for r**eceiving and responding to SH complaints.**

▶ All agencies have formal and informal mechanisms for seeking support or for reporting SH allegations but the range of available mechanisms varies. UNDP, UNICEF, OCHA, and UNOPS appear to have more channels available, whereas references to such mechanisms are more limited in the UNEP and ILO assessments.

How did the six agencies score against MOPAN's PSEAH benchmarks?

Figures 2 and 3 sum up progress across all agencies on MOPAN benchmarks. The graphic is based on a numerical score given by the assessment teams to each agency's fulfilment of each benchmark. We have taken the average of these scores, which range from highly satisfactory to highly unsatisfactory. As the graphics show, none of the benchmarks achieve the top score. This means that even in areas where agencies are doing well, such as policy framework or training and awareness-raising, more needs to be done to improve performance across all organisations.

Figure 2: Average performance rating for the prevention of and response to sexual exploitation and abuse

1. Organisation-specific dedicated policy statement(s), action plan and/or code of conduct that address SEA are available, aligned to international standards, and applicable to all categories of personnel

2. Mechanisms are in place to regularly track the status of implementation of the SEA policy at HQ and at field levels

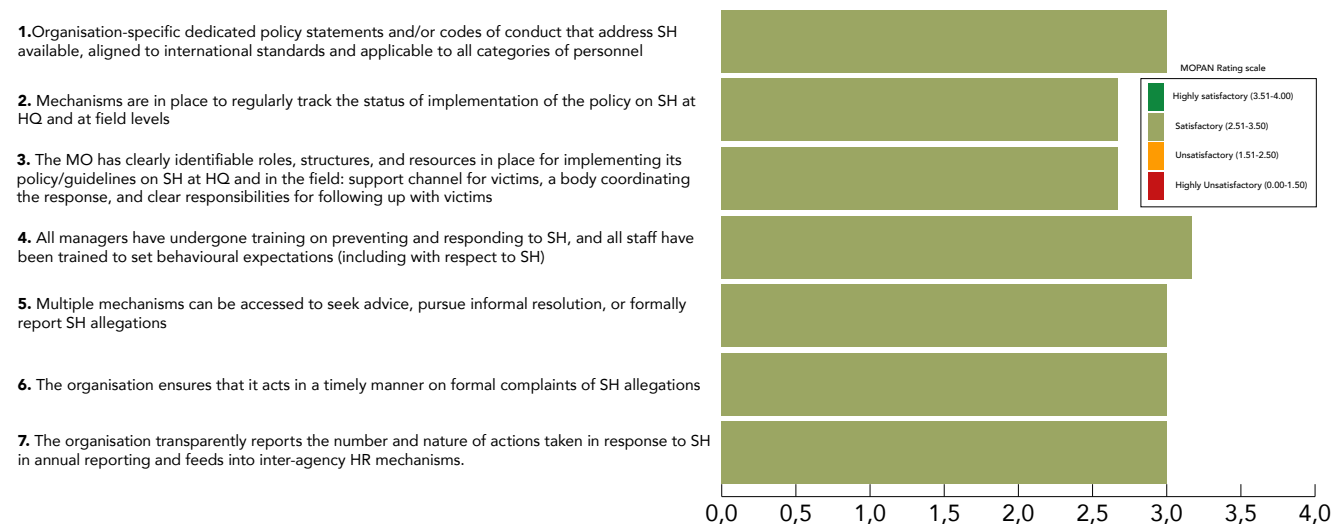**3.** Dedicated resources and structures are in place to support implementation of policy and/or action plan at HQ and in programmes (covering safe reporting channels, and procedures for access to sexual and gender-based violence services)

4. Quality training of personnel / awareness-raising on SEA policies is conducted with adequate frequency

5. The organisation has clear standards and due diligence processes in place to ensure that implementing partners prevent and respond to SEA

6. The organisation can demonstrate its contribution to interagency efforts to prevent and respond to SEA at field level, and SEA policy/best practice coordination fora at HQ

7. Actions taken on SEA allegations are timely and their number related to basic information and actions taken / reported publicly

8. The MO adopts a victim-centred approach to SEA and has a victim support function in place (stand-alone or part of existing structures) in line with its exposure/risk of SEA

9. Intervention design is based on contextual analysis including of potential risks of sexual abuse and other misconduct with respect to host populations. (element 5.4.5)

MOPAN Rating scale

- Highly satisfactory (3.51-4.00)
- Satisfactory (2.51-3.50)
- Unsatisfactory (1.51-2.50)
- Highly Unsatisfactory (0.00-1.50)

Note: As noted in the section 1.3 on Limitations, all scores must be read bearing several caveats in mind. As these were the first six assessments with the PSEAH component, MOPAN's benchmarks were not applied entirely consistently
Source: MOPAN 2021 Assessments

Figure 3: Average performance rating for the prevention of and response to sexual harassment

1. Organisation-specific dedicated policy statements and/or codes of conduct that address SH available, aligned to international standards and applicable to all categories of personnel

2. Mechanisms are in place to regularly track the status of implementation of the policy on SH at HQ and at field levels

3. The MO has clearly identifiable roles, structures, and resources in place for implementing its policy/guidelines on SH at HQ and in the field: support channel for victims, a body coordinating the response, and clear responsibilities for following up with victims

4. All managers have undergone training on preventing and responding to SH, and all staff have been trained to set behavioural expectations (including with respect to SH)

5. Multiple mechanisms can be accessed to seek advice, pursue informal resolution, or formally report SH allegations

6. The organisation ensures that it acts in a timely manner on formal complaints of SH allegations

7. The organisation transparently reports the number and nature of actions taken in response to SH in annual reporting and feeds into inter-agency HR mechanisms.

MOPAN Rating scale

- Highly satisfactory (3.51-4.00)
- Satisfactory (2.51-3.50)
- Unsatisfactory (1.51-2.50)
- Highly Unsatisfactory (0.00-1.50)

Note: As noted in the section 1.3 on Limitations, all scores must be read bearing several caveats in mind. As these were the first six assessments with the PSEAH component, MOPAN's benchmarks were not applied entirely consistently.
Source: MOPAN 2021 Assessments

2.2. Early insights into system-wide implications

This first round of pilot assessments offers some early insights into how the MOPAN benchmarks for PSEAH can work for different types of organisations with different structures and mandates. The points are drawn from the few assessment reports that explicitly address these issues when discussing how organisations can meet the MOPAN criteria and initial observations from reviewing assessments across this round.

The degree of exposure to risk of SEA may depend on various factors having to do with organisational structure, including the following:

- ◉ **Organisational activities:** Given that most of its work is normative, the ILO has only recently begun to consider SEA as a potential risk. This tardy recognition may explain why ILO's PSEAH systems are less mature and why its scores are relatively low compared to those of other organisations. The assessment notes, however, that ILO recognizes that the changing nature of its work, such as its programmes with migrants, increase its exposure to such risks. It does not provide further information on whether ILO's judgment of its exposure to risk is justified, or whether its understanding of SEA is limited to its prevalence in humanitarian programmes. ILO has many country and regional offices worldwide that are involved in implementing development programmes involving beneficiaries posing a risk of SEA. In addition, even in programmes without beneficiaries, there is a risk of SEA in interactions between staff and the community and population at large.

- ◉ **Organisational structure:** The UNEP assessment also notes that UNEP considers its exposure to SEA to be low because it has no country presence. The assessment report does not expand on this point. It would have been useful to explore this further, for instance by asking to what extent UNEP implements through partners, what oversight of their activities is carried out, or the extent to which UNEP staff travel and what risks this creates.

- ◉ **Delivery model:** Remoteness from the point of delivery is also an issue for UN entities, although a lesser issue than for development banks and donor governments. UN agencies do not usually implement directly but rather through layers of partnerships. The assessment reports do not address this point explicitly. It is accepted that working through partners poses a risk of SEA that is harder to control than direct delivery by organisational personnel who can be more easily regulated. The due diligence benchmark was included for this reason, to ensure that PSEA requirements were included in contractual agreements with downstream partners. Most assessed organisations had begun to build requirements into contractual relationships with partners but few had gone beyond that to verify compliance and to enforce standards. Progress in UNICEF and UNDP appeared most advanced in this area, possibly because the risk is enhanced since their delivery models involve working through partners (although this is not expressly stated in the reports). In addition, both organisations were building partner capacity. This is not a requirement under MOPAN benchmarks currently, but it is a good practice for ensuring compliance down the chain. In addition, regular monitoring of partner organisations and their operations is key to PSEA. This is not a requirement under MOPAN benchmarks, but it is important for ensuring that systems for prevention and response to SEA are functioning and for recognising red flags.

- ◉ **Type of partners:** The UNDP report makes the point that UNDP finds it challenging to apply SEA standards as most of its partners are governments rather than non-governmental organisation (NGO)s, and that governments operate in different country contexts and have different legal standards. This highlights the point that the nature of a partnership may have implications for the degree to which UN agencies can enforce SEA requirements. It could allow for greater scope in controlling delivery through smaller NGOs and for lesser scope with large governmental partners where other political factors may come into play. Nonetheless, it remains important to recognize that SEA and SH standards are embedded in the international aid structure, particularly through the DAC Recommendation, which creates obligations for all those engaging with the system.

⊙ **Defining SEA and SH:** SEA and SH definitions also arise as an issue in some of the assessment reports and require further discussion. While definitional clarification is a wider debate in the sector, the key issue for these assessments is whether the assessed UN entities understand and use UN definitions. The MOPAN assessment process adopts UN definitions of SEA and SH that have existed for some 20 years (since 2003 UN Secretary-General bulletin) and are likely framed this way for legal reasons. The UNDP assessment in particular notes that the distinction between SEA and SH is poorly understood and that the two phenomena tend to be conflated, which poses risk in particular in monitoring actions and progress. The ILO reports also makes this point, but the other assessment reports do not raise the issue. There would be merit in further studying what benefit the clear distinction between the two forms of misconduct has brought to organisations, such as UNICEF, which has a longer history of engagement with the issue, and how this distinction facilitates clarity of procedures and monitoring.

The difference in agency performance is also interesting to explore. It may be due to the level of exposure to risk or to the characteristics of a particular organisation. UNICEF and UNDP emerge as strong performers. The reports do not explore why. Internal leadership and commitment to the issue may be stronger, or both organisations may have been directly affected by or closely associated with the agencies embroiled in high level scandals that could have fostered change.[3]

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3   UNDP [Senior UN official loses his appeal against sexual misconduct sacking | Global development | The Guardian] ;
    [UNICEF deputy resigns after harassment allegations – DW – 02/22/2018]

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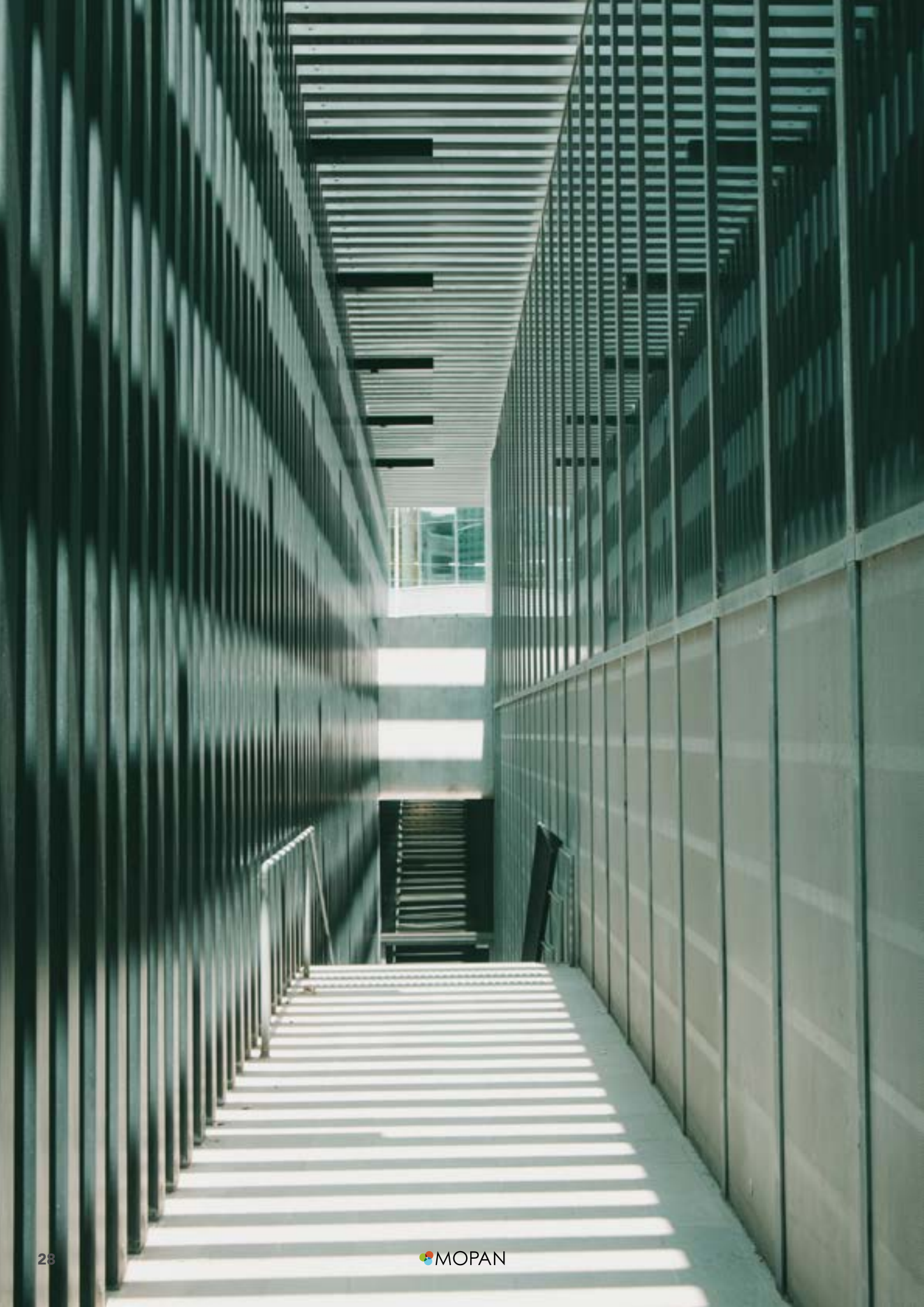
CONCLUSIONS

3.1. From words to deeds

Fighting impunity in cases of sexual exploitation, abuse and harassment by aid workers remains a challenge in organisations and requires the concrete support of the international community. Over the last years, organisations, donors, and other stakeholders have made many commitments. It is not the policies that have been lacking. The major challenge remains translating the words into deeds.

This main finding of MOPAN's most recent analysis comes out clearly from its first round of monitoring of six UN organisations. All agencies in the sample now **have organisation-specific policies or strategies on both SEA and SH.** All but one meet MOPAN's requirements for **training and awareness-raising** and have good evidence of completion rates. All **report** the number of SEA allegations transparently, thanks mainly to the mandatory reporting system established by the UN Secretary-General.

Not all organisations are equally advanced in their responses to PSEAH. Across agencies the lack of resources for PSEAH was observed and is at the root of their struggles in several cases. As such, most had yet to **dedicate resources and structures** to protecting from sexual misconduct. Only UNDP and UNICEF were able to demonstrate dedicated structures at HQ and field level at the time of the assessments. The degree to which organisations held their **implementing partners** to account varied. All were in the process of strengthening their due diligence mechanisms for PSEAH; UNICEF and UNDP showed some progress in vetting implementing partners and building their capacity. **Inter-agency co-ordination** was another uneven are of performance. OCHA, which has a co-ordinating role in the humanitarian sector, plays a driving role; UNICEF, too, has taken on additional responsibilities. But most agencies assessed engage with other agencies mainly at HQ level and far less at country level. Again, this was often a question of resources.

In protecting from SEA, four areas appeared weak and require significant investment. Mechanisms to **track the implementation of policies** to protect from sexual misconduct were generally weak. Where mechanisms for monitoring were in place, they were not active. All organisations have committed to **victim-centred approaches** on paper, but only UNICEF and UNDP could demonstrate some tangible action in this regard. Finally, most agencies had considered **risk management** in relation to SEA, but only the UNICEF assessment confirmed that SEA risks were actually being assessed.

The differences in the maturity of agencies was also clear In protecting from sexual harassment. Most have some **structures and resources** in place at HQ, but less so in the field. UNDP and UNOPS were best able to demonstrate **victim-related functions.** UNDP had the greatest variety of mechanisms for resolving issues. Organisations do not always respond to complaints of sexual harassment in a timely manner, and only UNDP and UNICEF were clearly tracking the rapidity with which complaints were handled. **Public reporting** on sexual harassment cases is often not transparent as it is in SEA. Some organisations take it upon themselves to report publicly. UNICEF, UNDP and UNOPS report allegations of sexual harassment transparently in annual reports while others choose to keep matters internal.

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3.2. Where next from here?

This synthesis report is a stepping stone for MOPAN. It is expected to be the first lesson-learning study in a series.

Going forward, as the coverage of its assessments continues to expand, the next synthesis study will review the performance of several multilateral development banks and vertical funds that MOPAN has reviewed over 2022-23. It will ask how their PSEAH approaches differ from those in UN organisations and will therefore allow for a more system-wide perspective on collective progress. Analysing common trends and good practices is central to inform learning across organisations and between organisations and their stakeholders.

MOPAN's commitment to raise the level of performance of multilateral organisations in safeguarding against SEAH underlies this endeavour. Well-functioning safeguards, notably those against SEAH, are essential for trust in the multilateral system. MOPAN plays a crucial role in contributing to accountability and learning on these issues. Therefore, MOPAN will also continue to develop and refine its benchmarks for the protection from SEA and SH that organisations and member states recognise as crucial for progress.

Access to, and use of performance information is central to inform accountability and learning on PSEAH. Therefore, more efforts will be invested in making MOPAN's performance information more readily available for member states and organisations to inform dialogue.

Lastly, MOPAN will be investing further in the quality of its PSEAH assessments over the coming years to strengthen its role monitoring the progress in multilateral organisations in protecting from sexual exploitation, abuse and harassment. The experience from the six first assessments has highlighted that assessing the SEA/SH component is a complex, time-consuming endeavour that requires expertise and sufficient resources if it is to help improve performance in this area. Solidifying its assessments and PSEAH benchmarks over the coming years will therefore be a priority.

MOPAN will continue its reflections and dialogue with its members and organisations on how it can best serve them and the larger international community with its PSEAH products.
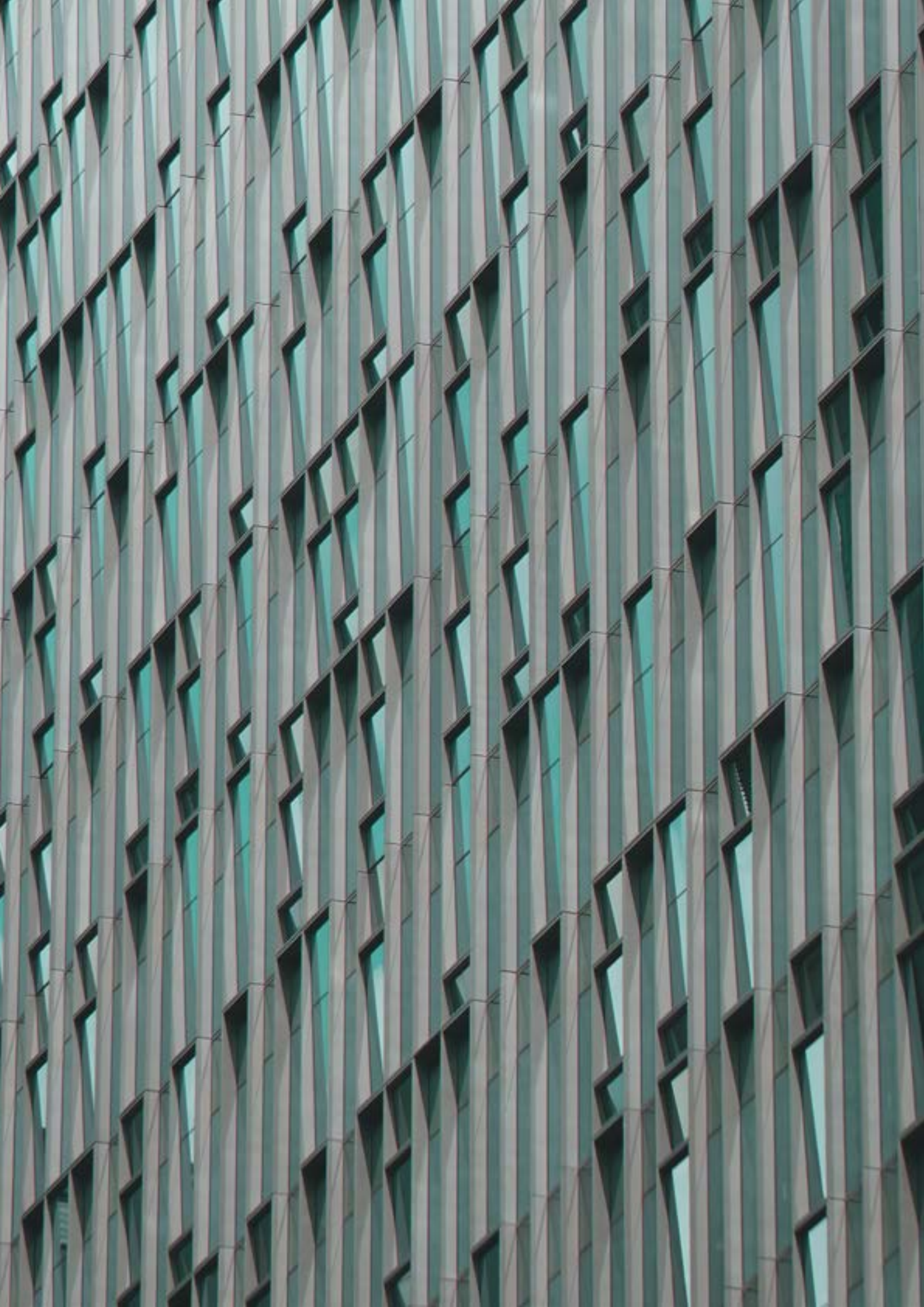
ANNEXES

Annex 1: Detailed synthesis of performance

Performance against SEA benchmarks

This section looks more closely at the assessment content for each SEA benchmark in the MOPAN 3.1 methodology. It sets out key findings by benchmark, as stated in Tables 1 and 2, alongside a fuller analysis, located in section 1.2 on Objectives and Approach (page 19). The analysis shows that agencies vary in their ability to meet the different benchmarks and that some prove more challenging than others. The analysis also shows that some agencies are better able to meet the requirements than others.

Summary of collective performance by benchmark

Table 3: Summary of agency performance against MI 4.7 on sexual exploitation and abuse

MOPAN Micro-indicator 4.7: Prevention of and response to sexual exploitation and abuse	
Element 1	**Organisation-specific dedicated policy statement(s), action plan and/or code of conduct that address SEA are available, aligned to international standards, and applicable to all categories of personnel.** All organisations meet the basic requirement of having an organisation-specific dedicated policy, action plan or code of conduct. Some have more developed action plans (UNICEF, OCHA and UNOPS) that have been field tested, and require action plans from country offices. Not all assessments state clearly whether these policies align with international standards and apply to all categories of personnel, but this is likely to be the case as these requirements are stated in overarching UN policies on SEA that apply to all UN entities.
Element 2	**Mechanisms are in place to track the status of implementation of the SEA policy regularly at HQ and at field levels.** While mechanisms are in place to track the implementation of policy there is little evidence that they are active. Moreover, the mechanisms that do exist are primarily at HQ level and not in the field. Overall, none of the agencies fulfil this element well. OCHA does slightly better based on more comprehensive descriptions in the assessment of systems in place at HQ and field level to track policy implementation.
Element 3	**Dedicated resources and structures are in place to support policy implementation and/or action plan at HQ and in programmes (covering safe reporting channels and procedures for access to sexual and gender-based violence services).** Organisations are at different stages of setting up dedicated structures and resources. UNDP and UNICEF appear to have made the most progress at HQ and country level in setting up structures and applying dedicated resources to them. The lack of sufficient resources is major challenge that is particularly highlighted in the OCHA report given its inter-agency role globally and in country. The remaining organisations (UNEP, UNOPS, ILO) have higher-level structures. For UNEP and ILO, the issue of SEA is integrated into wider frameworks for dealing with behaviour issues. In UNOPS, a system of field-level focal points is emerging. Community-based Complaints Mechanisms (CBCM) are also noted as important inter-agency structures, especially for organisations working in humanitarian operations, as highlighted in the OCHA assessment.

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Element 4	**Quality training of personnel/awareness-raising on SEA policies is conducted with adequate frequency.** Five of six agencies were able to meet this benchmark and have programmes for SEA training and awareness raising. The available data show good rates of completion across agencies but these cannot be compared given different organisational sizes and number of personnel, and varying dates at which completion rates are calculated for the MOPAN assessment, etc. All except ILO demonstrate good rates of completion and confirm that the training is mandatory for all personnel.
Element 5	**The organisation has clear standards and due diligence processes in place to ensure that implementing partners prevent and respond to SEA.** The applicable standards are established by the 2018 United Nations Protocol on Allegations of Sexual Exploitation and Abuse Involving Implementing Partners and some agencies have gone further to refer to the obligations of implementing partners in their own strategies. All are in the process of developing due diligence measures. UNICEF is the most advanced; data provided in the assessment report substantiates how these due diligence standards are being applied. Although not expressly mentioned in the element, some organisations, particularly UNICEF and UNDP, build partner capacity alongside due diligence. The difference and challenge in applying these standards to governmental partners as opposed to non-governmental partners are also highlighted in the UNDP assessment.
Element 6	**The organisation can demonstrate its contribution to inter-agency efforts to prevent and respond to SEA at field level, and SEA policy/best practice co-ordination fora at HQ.** All organisations participate in inter-agency efforts to some degree at HQ level, partly depending on their role in the UN family of organisations, with OCHA taking the lead in co-ordination. UNICEF has also been very pro-active in engaging with inter-agency efforts. The majority of agencies are good at engaging with HQ level initiatives, but engagement is weaker at field level. Only UNICEF and OCHA provide evidence of efforts at inter-agency engagement.
Element 7	**Actions taken on SEA allegations are timely and their number related to basic information and actions taken are reported publicly.** All meet the requirement of public reporting as they are part of a standardised system in line with the UN SG annual reporting on special measures to tackle SEA. Some assessments also demonstrate other ways in which agencies publicly report information about allegations and actions taken. However, when it comes to timely actions, only UNICEF and UNDP demonstrate concrete efforts to make their responses timelier.
Element 8	**The organisation adopts a victim-centred approach to SEA and has a victim support function in place (stand-alone or part of existing structures) in line with its SEA exposure/risk.** This element is generally not well-met by assessed agencies. Some organisations recognise the need for a victim-centred approach that should be included in most strategies (UNDP, UNICEF, UNOPS and OCHA). Evidence of victim-support functions and practical assistance is very limited. UNDP and UNICEF are the only organisations that can demonstrate efforts in this regard. Except in UNDP's assessment, reference is limited to CBCM, an important inter-agency vehicle for handling complaints and providing support to victims.

Source: MOPAN Metholodogy 3.1

Table 4: Summary of agency performance against MI 4.8 on sexual harassment

MOPAN Micro-indicator 4.8: Prevention of and response to sexual harassment	
Element 1	**Organisation-specific dedicated policy statements and/or codes of conduct that address SH are available, aligned with international standards, and applicable to all categories of personnel.** All agencies have organisation-specific dedicated policies or codes, although for ILO, these need updating. Most refer to the main international standard applicable, the 2018 UN Model Policy. Only two reports make clear that the policies are applicable to all personnel categories, but this may reflect a lack of information in the other assessment reports. None of the assessments include much information on implementation.
Element 2	**Mechanisms are in place to regularly track the status of SH policy implementation at HQ and at field levels.** Some agencies (UNDP, UNICEF, UNOPS, ILO) are reported to have mechanisms for tracking policy implementation at HQ level. The assessments contain very little information on field level mechanisms and, as such, the element is not substantially achieved overall.
Element 3	**The organisation has clearly identifiable roles, structures, and resources in place for implementing its policy/guidelines on SH at HQ and in the field: a support channel for victims, a body co-ordinating the response, and clear responsibilities for following up with victims.** All organisations have structures at HQ level for implementing SH policies. The UNICEF, OCHA, UNDP, and UNOPS reports specify a coordinating body with overall responsibility in line with the element. UNDP and UNOPS also mention practical initiatives for providing support to victims. There is very little information on country-level structures except for UNICEF. ILO and UNEP emerge as having the fewest mechanisms and least co-ordination around this issue at HQ and in the field. Only one report (UNOPS) addresses the question of dedicated financial resources and admits that they are lacking. Overall, for different reasons, four agencies do better – UNICEF, OCHA, UNDP, UNOPS – while two are weaker – ILO and UNEP.
Element 4	**All managers have received training on preventing and responding to SH, and all staff have been trained to set behavioural expectations (including with respect to SH).** Most agencies (UNICEF, UNEP, OCHA, UNDP) refer to mandatory staff training; UNDP/UNEP/UNOPS particularly emphasise training for managers. The UNICEF, UNEP, and UNDP reports also include data on training completion rates. ILO has yet to roll out a global training programme.
Element 5	**Multiple mechanisms can be accessed to seek advice, pursue informal resolution, or formally report SH allegations.** All agencies have formal and informal mechanisms for seeking support or for reporting SH allegations. However, the range of mechanisms available differs. UNDP (in particular) and UNICEF, OCHA, and UNOPS as well have more channels available. Descriptions in the UNEP and ILO assessments are more limited.

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Element 6	**The organisation ensures that it acts in a timely manner on formal complaints of SH allegations. All agencies commit to handling complaints in a timely fashion, but only the UNDP and UNICEF assessments provide data to show how they are doing so.** ILO and UNOPS affirm their policy commitments to timeliness but there is insufficient substantiating information: their policies are not comprehensive (e.g., ILO has deadlines for some stages but not others while UNOPS does not stipulate any deadlines). In any case, there is no data showing how long complaints take. OCHA and UNEP rely on another UN entity UN Office for Internal Oversight Services (OIOS) to investigate on their behalf and therefore do not control the timeline.
Element 7	**The organisation transparently reports the number and nature of actions taken in response to SH in annual reporting and feeds into inter-agency HR mechanisms.** Most assessments describe a process for reporting the number of SH cases and the actions taken; UNICEF, UNDP and UNOPS meet the requirement better than the others. These three assessments make it clear that reporting occurs annually. The level of transparency varies and seems defined differently by different organisations. The three agencies in question make explicit reference to a high level of transparency in public reporting. By contrast, the ILO report says that the information is kept internal; the OCHA report does not address this point, and the UNEP report concludes that there is transparent reporting without providing further details. All agencies participate in ClearChecks, an inter-agency human resources mechanism aimed at preventing rehiring perpetrators.

Source: MOPAN Metholodogy 3.1

Detailed performance of the six UN organisations against MOPAN's benchmarks

Policy framework

Element 4.7.1

"Organisation-specific dedicated policy statement(s), action plan and/or code of conduct that address SEA are available, aligned to international standards, and applicable to all categories of personnel."

Key findings: All organisations meet the basic requirement of having an organisation-specific dedicated policy, action plan, or code of conduct. Some have more developed action plans (UNICEF, OCHA and UNOPS) that have been field-tested, and require action plans from country offices. Not all assessments state clearly whether these policies align with international standards and apply to all categories of personnel, but this is likely to be the case as these requirements are stated in overarching UN policies on SEA that apply to all UN entities.

All organisations have an **organisation-specific document** on SEA, whether it is a policy statement, an action plan, a strategy, or a code of conduct. Only ILO has a policy: the ILO Directive on the Prevention and Response to Sexual Exploitation and Abuse (hereafter referred to as the ILO Directive) issued on 9 July 2020. UN entities ought to follow the policies of the UN Secretariat, namely the 2003 UN Secretary-General's Bulletin (ST/SGB/2003/13) (hereafter referred to as the 2003 UN SG Bulletin) as well as more recent protocols i.e. the 2019 UN Protocol on the Provision of Assistance to Victims of Sexual Exploitation and Abuse (hereafter referred to as the 2019 UN SEA Victims Protocol) and the 2018 UN Protocol on Allegations of Sexual Exploitation and Abuse involving Implementing Partners (hereafter referred to as the 2018 UN SEA Implementing Partners Protocol). As such, individual entities often have no separate policy, and if they do, as in the case of ILO, it would be important to know if, how, and why it deviates from the UN Secretariat policy. The UNEP assessment expressly states that UNEP does not have an organisation-specific policy as it follows the core UN Secretariat policy. The UNDP report also refers to a code of ethics setting out expected behaviour, culture, and standards. The same points apply as with a policy obliging UN entities to adopt common codes of conduct applicable to international civil servants and partner organisations and as such any organisation-specific code should explain deviations.

More relevant is whether there are **organisation-specific implementation documents,** called by different agencies variously strategies or action plans. The distinction is not always made clear but it is presumed that action plans are a more detailed level of operational commitment. All agencies assessed have such a document.

- ⊙ **UNICEF** adopted a Strategy to Prevent and Respond to Sexual Exploitation and Abuse and Sexual Harassment (hereafter referred to as UNICEF strategy) in 2019. It sets out UNICEF's vision and goals as well as concrete strategies and interventions and locates accountability at the level of the individual, leadership, and the organisation. The assessment report notes that country offices are required to develop PSEA action plans/ work plans that are enforced internally and with implementing partners. However, the UNICEF strategy itself recognizes a need for more operational guidance: a coherent, complementary set of policies and procedures; an accountability framework that sets out roles and responsibilities at every level; a monitoring and evaluation framework with tangible benchmarks for measuring progress on strategy implementation, and a resourcing and capacity building strategy.

- ⊙ **OCHA** has a 2020 SEA Action Plan (hereafter referred to as OCHA Action Plan) and a Standard Operating Procedure on Sexual Misconduct (hereafter referred to as OCHA SOP) that has been field-tested, as well as Critical Incident Guidelines. Work to refine the SOP was said to be ongoing at the time of the assessment.

- ⊙ **UNOPS** has a Prevention of Sexual Harassment and Sexual Exploitation and Abuse Strategy (hereafter referred to as the UNOPS strategy) comprising guiding principles and key intervention areas. It is reported to have a

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plan but the assessment team did not see it, although it did find ad hoc evidence that country offices (e.g., South Sudan and Myanmar) use a standardised template to develop their own country action plans on a discretionary basis.

- ⊙ The **ILO** policy is said to be supported by a 2020 "Prevention of Sexual Exploitation and Abuse (PSEA) Action Plan" (hereafter referred to as ILO Action Plan) but the assessment report mentions in passing that interviewees identified a need for an overall comprehensive strategy to operationalise prevention and awareness-raising about SEA.

- ⊙ **UNDP** has submitted a Strategy and Action Plan to the SG that covers SEA and SH at the same time. (referred to as the UNDP Strategy and/or UNDP Action Plan)

- ⊙ **UNEP** also developed an action plan for SEA prevention in 2020 (referred to as UNEP Action Plan), but there is little more detail in the assessment report.

The organisation-specific policies should be **aligned to international standards,** namely the 2003 UN SG Bulletin. Only two reports (OCHA and UNDP) explicitly mention this. (This is not to say that the other organisations do not align their policies with international standards, but it may simply be that the assessment reports did not mention this detail). UNICEF has also signed up to an additional international standard, the DAC Recommendation on Ending Sexual Exploitation, Abuse, and Harassment in Development Co-operation and Humanitarian Assistance: Key Pillars of Prevention and Response. This is seen as a positive, though the assessment does not reflect on the practical and strategic implications for an agency of having signed up to both the DAC Recommendation and the 2003 UN SG bulletin, the principle policy document applicable to the UN.

This element requires that SEA provisions **apply to all categories of personnel**. The OCHA and UNOPS assessments affirm that the SEA policy applies to all personnel; the OCHA report further explains that there are differing responsibilities and separate sets of SEA-related instructions for heads of departments, offices, and missions. The ILO and UNDP reports refer to the application of the policy to personnel categories used across the UN System that includes staff, consultants, individual contractors, service contractors, and interns. The ILO policy further specifies that it applies to the director-general as well as to UN volunteers, external collaborators, grantees, implementing partners, vendors, as well as any of their employees or subcontractors. The UNICEF assessment does not expressly address this point. (Given information elsewhere in the assessment about the expectation of UNICEF implementing partners, it can be assumed that to whom the policy applies is defined broadly). The UNEP report refers to the application of the policy to staff, which may be construed as narrower, or it may simply be that the assessment report did not elaborate on this point.

There appears to be contradictory information in the assessment reports about how UN common codes of conduct and ethics incorporate SEA. The ILO report states that ILO contracts require ILO officials to sign a declaration when they are recruited that they have read and understood the 2013 International Civil Service Commission Standards of Conduct (ICSC). It goes on to say that the ICSC does not specifically mention SEA, that this was due to be updated by the end of 2020 but had been delayed. It also notes that the performance appraisals for senior managers do not currently include SEA prevention, although this was in ILO's action plan. The UNDP report says that all staff are responsible for "abiding by the UN Staff Rules and Regulations". It further states that the SEA section of UNDP's Code of Ethics specifically cites the UN Staff Rules and Regulations and the Regulations Governing the Status, Basic Rights and Duties of Officials other than Secretariat Officials and Experts on Mission (which applies to all non-staff, volunteers, contractors, consultants etc.)

It is positive that three of the assessed organisations -- UNICEF, UNDP and UNOPS -- had undertaken an independent review prior to developing a strategy/action plan. The 2019 Independent Panel Review of the UNICEF Response to PSEA found that the policy and guidance on PSEA lacked coherence, that there was an information overload and strategic deficit on PSEA, and that support was needed on operational implementation. UNDP and UNOPS (alongside UNFPA, which was not part of this round of MOPAN assessments) also underwent a joint external independent review of their SEA and SH policies in 2019.

The UNDP assessment identifies a challenge in that UNDP's approach appears to conflate SEA and SH in a way that makes it difficult to track progress on tackling PSEA. The assessment report states that the expected results and related action plan indicators do not consistently differentiate SEA from SH issues and cites documents on SH or gender-based violence (GBV) that also include definitions of SEA rather than keeping it distinct. The 2018 UN Policy on Harassment, Sexual Harassment, Discrimination and Abuse of Authority, for example, includes a definition of SEA, and the 2019 revisions to UNDP's Social and Environmental Standards now include SEA and GBV risks. It is difficult for this analysis to draw any conclusions based solely on the content of the assessment report. However, it can be observed that other organisations, as noted above, have overarching strategies that refer to both SEA and SH but that lower-level action plans differentiate the two and recognise that separate measures are needed to tackle each one.

The assessments contain further information relevant to other benchmarks. For instance,

- ⦿ **ILO - Confirmation of reporting and handling SEA cases.** The letter/checklist of representation that ILO field and HQ managers sign annually as part of the ILO accountability framework contains a question (since 2020) asking whether situations involving SEA have been promptly and accurately reported.

- ⦿ **UNICEF - Investment and leadership.** UNICEF interviews indicate that UNICEF has invested in addressing PSEA and plays a leadership role among UN agencies in this area, while recognising that much work remains to be done (given the scale and nature of the problem).

Tracking policy implementation

Element 4.7.2

Mechanisms are in place to regularly track the implementation status of the SEA policy at HQ and at field levels.

Key findings: Mechanisms are in place to track policy implementation but there is little evidence that they are active. Moreover, those mechanisms that do exist are primarily at HQ level and not in the field. Overall, none of the agencies fulfil this element well. OCHA does slightly better based on more comprehensive descriptions in assessing systems at HQ and field level to track policy implementation.

Mechanisms to track the implementation of SEA and SH policies either exist on paper but are not active, or do not exist at all. OCHA's assessment is the most detailed in citing the range of tracking mechanisms. It states that the IASC Senior Coordinator for PSEA and SH serves as the global focal point for PSEA monitoring compliance and implementation of organisational commitments and chairs a cross-functional task force on PSEA. OCHA documents cite mechanisms to track the implementation of its own approach to SEA: field-level humanitarian coordinators are responsible for monitoring and reporting to the Under-Secretary-General; the responsibilities of the country-based pooled funds oversight and compliance unit, the humanitarian coordinator's annual retreat, the central emergency response fund annual results report, as well as OCHA's corporate risk register. However, the assessment did not obtain any documentary evidence that they were active. The only monitoring activity in 2019 appeared to be an ad hoc survey particularly about field testing the OCHA Standard Operating Procedures.

The most concrete evidence of tracking policy implementation was in the UNOPS assessment, which finds that the 2020 annual report of the executive director includes an update on activities for the prevention of PSEA. In UNOPS, tracking implementation status is a responsibility of the task force, comprising the Directors of Internal Audit and Investigations Group, Legal Group, People and Change Group, and the Ethics Office. The report notes the existence of mechanisms at HQ to track the status of the strategy's implementation, the responsibilities of the task force, and the composition of the body.

The UNDP assessment says that the SEA/SH task force is responsible for tracking progress and for reporting to the administrator's executive group. The 2019-20 action plan has expected results and activity level indicators, but the assessment team saw no reports showing that progress was being tracked. The assessment report reiterates the

point (as in the previous benchmark) that dealing with SEA and SH issues together does not help track progress specifically on SEA.

The ILO assessment says that SEA prevention and response policy is tracked through the 2020 action plan but provides few other details. The UNEP assessment has no information on tracking policy. The UNICEF assessment does not state what mechanisms exist but concludes that this criterion is not substantially achieved due to chronic under-reporting, gaps in accountability and prevention, as well as a lack of PSEA indicators linked to the (organisational) 2018-21 strategic plan.

Mechanisms, where they exist, are mainly at **HQ level rather than in the field.** OCHA (as above) and UNOPS describe mechanisms that span HQ and the field (e.g., UNOPS has generic templates for the field) but the assessments could find no evidence that these were being applied. The UNDP assessment report says there are early efforts by country offices to highlight their work on SEA through the Results-Oriented Annual Reporting but does not provide details of the extent of this activity. The ILO report recognises that further efforts are needed to establish field level mechanisms.

The assessments contain information on the **tracking complaints** rather than policy. Complaints tracking appears to be more systematic across organisations, which may be due to stronger co-ordination within the UN system on tracking them as compared to tracking policy. The focus on tracking complaints in the assessment reports is narrower than the benchmark requirements, which refer to tracking the organisation's overall policy response. ILO typically states that formal complaints are tracked in a database managed by the Office of the Internal Auditor and Oversight (hereafter referred to as ILO Office of the Internal Auditor). The UN Secretariat has an annual management certification process instituted by the UN SG that requires annual reporting of allegations and compliance with SEA and SH requirements. As such the entities assessed e.g., ILO, UNDP, and UNEP, expressly state that their leadership has submitted such certifications to their respective governing bodies and to the UN SG. However, this only deals with reported complaints and does not show the degree to which complaints mechanisms are accessible, particularly to affected populations. The UNOPS report states that there was ad hoc evidence that the Internal Audit and Investigation Group (hereafter referred to as UNOPS Internal Audit Group) included PSEA in its audits.

Resources and structures for policy implementation

Element 4.7.3

Dedicated resources and structures are in place to support the implementation of policy and/or action plan at HQ and in programmes (covering safe reporting channels, and procedures for access to sexual and gender-based violence services).

Key findings: Organisations are at different stages in having dedicated structures and resources. UNDP and UNICEF appear to have made the most progress at HQ and country level in setting up structures and applying dedicated resources to them. The lack of sufficient resource is major challenge and is particularly highlighted in the OCHA report, given its inter-agency role globally and in country. The remaining organisations (UNEP, UNOPS and ILO) have higher-level structures, and in the case of UNEP and ILO, the issue of SEA is integrated into wider frameworks for dealing with behaviour issues. In UNOPS, a system of field level focal points is emerging. CBCMs are also cited as important inter-agency structures especially for organisations working in humanitarian operations, as highlighted in the OCHA assessment.

The degree to which organisations have dedicated structures focused on SEA at HQ/global level varies. Some, like UNDP and UNICEF, have comprehensive systems. UNOPS has a task force team (but little detail is given) and OCHA has a senior post. UNEP and ILO appear to deal with the issue through overall frameworks for dealing with behaviour and discipline.

- ⊙ **UNDP** has a task force comprised of HQ and country staff that meets monthly and is dedicated to implementing the SH and SEA strategy and action plan. Its TOR includes responsibilities in line with this benchmark, including strengthening reporting mechanisms and support to victims (and this is the only assessment to bring out these aspects). The taskforce was created by the administrator in 2018 to address SH and expanded in 2019 to include SEA. Other structures include UNDP's internal justice system, especially the Office of Audit and Evaluations and Ethics (hereafter referred to as UNDP's Office of Audit) through reporting, training, and advice; the Clear Check Committee that reviews cases of SH and SEA for non-staff personnel, and relevant policy teams, including UNDP's Gender Team and the Effectiveness Team (responsible for compliance/accountability/risks).

- ⊙ In 2019, **UNICEF** created a position focusing on PSEA and SH in the Office of the Executive Director, to support UNICEF with an enhanced and accelerated response, including direct support to country and regional offices and to staff.

- ⊙ **UNOPS** has an internal task force team to oversee the delivery of the strategy but had no full time PSEA officer at the time of the assessment.

- ⊙ The only full-time staff post in **OCHA** is the Senior Coordinator for PSEA and Sexual Harassment, which has considerable internal and inter-agency responsibilities and is seen as significantly under-resourced. As a non-implementing agency, OCHA does not operate its own case reporting mechanisms or support services, which are provided by other agencies.

- ⊙ **UNEP** has a system of focal points, but these are not specific to SEA. Its 2020 action plan states that a new mechanism comprised of four conduct and discipline focal points was created to "foster a better work culture in UNEP" and to provide information to individuals affected by conduct issues in the workplace. As these focal points handle all aspects of conduct and discipline, they are not responsible for implementing only the PSEA Action Plan. A new email address was also set up for reporting complaints about the UNEP Executive Director, which did not preclude reporting directly to the UN Office of Internal Oversight Services.

- ⊙ The **ILO** appears to have no dedicated full-time or part-time staff working on SEA. Responsibilities are assigned to existing structures and recognised as in need of reinforcement according to the assessment. There is an internal informal working group comprised of the human resources department, the ethics office and the office of the legal adviser that oversees the implementation of the directive. The chief internal auditor is the focal point for dealing with SEA (among other responsibilities) allegations and investigation response. No other structures appear to exist for internal co-ordination or focal points, or other activities related to policy implementation other than the recognition (not yet acted on) that SEA should be a formalised responsibility in job descriptions and performance appraisals for those tasked with preventing and responding to it, including senior managers.

Some organisations (UNDP, UNICEF, OCHA) have made progress in establishing structures at country level:

- ⊙ **UNDP** has structures at country level with designated PSEA focal points in the majority of its country offices. In a task force survey from 2019, 95% of country offices that responded (98 of 130 country offices) confirmed they had a PSEA Focal Point who was in place and active. In specific country contexts, UNDP country offices recruit a designated PSEA coordinator.

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- The **UNICEF** assessment reported that since 2018, 54 country offices had scaled up their systems to address PSEA by training staff and partners and rolling out reporting and response procedures across operations. However, the assessment also noted that this benchmark was not fully achieved as it would be challenging to maintain current investments at HQ level and more than half the country offices appeared not to have scaled up their PSEA systems.

- **OCHA** has the role of inter-agency co-ordination, often through national PSEA networks. In 2019-20, 12 of 28 humanitarian operations (43%) had full-time, inter-agency PSEA co-ordinators supporting and facilitating the network and in-country PSEA implementation. The remaining operations were either in the process of recruiting a PSEA co-ordinator or were using existing staff to fill the role. The assessment indicates that the PSEA focal points in-country are not necessarily specialists nor are these dedicated posts and as such need technical support from the senior coordinator.

- The **UNOPS** assessment found that SEA focal points were beginning to be established across the organisation in 2020. PSEA focal points had been designated in five duty stations.

The main issue facing implementation is **dedicated resources.** *Most of the assessments indicate that resources are inadequate despite greater investment in some agencies.*

- The **UNDP** Action Plan provides for at least one full-time PSEA co-ordinator (budget for the co-ordinator(s) is provided by regional bureaus); one additional lawyer recruited in 2019, and two additional SH/SEA investigators who were being recruited at the time of the assessment. According to the SEA/SH Strategy and Action Plan, all activities are attached to staff time apart from USD 135 000, which is budgeted for piloting the Respectful Workplace Facilitator in country offices; USD 15 000 for ClearCheck staff vetting, and USD 25 000 for a helpline. Overall, the structures and positions are in place and there appears to be funding for four new roles and other activities. However, it is generally unclear from the assessment report how many staff roles are specifically designated or the extent to which these functions are subsumed under existing roles.

- **UNICEF** reports that it has strengthened its internal investigative function, bringing staffing in the investigations section to 17, and the appointment of a case co-ordinator for all allegations involving SH, harassment and abuse of authority, to which around half the efforts of the Office of Internal Audit and Investigations (hereafter referred to as UNICEF's Office of Internal Audit) are dedicated, according to interviews. (It is not clear if this is the totality of UNICEF resources since the assessment does not report on anything else).

- The **OCHA** assessment found insufficient resources to support full implementation. The only full-time staff post is the senior coordinator for PSEA and SH, which has considerable internal and inter-agency responsibilities and is seen as significantly under-resourced. As a non-implementing agency, OCHA does not operate its own case reporting mechanisms or support services, which are provided by other agencies

- The **UNOPS** focal points appear to be assigned rather than voluntary and have ToRs associated with them although it is not clear how they translate into an individual's work plan or how much dedicated resources or time are spent on PSEA. The UNOPS report also found no evidence of dedicated financial resources available for supporting SEA policy and action plan implementation and that the expectation was that the management budget would be used.

Some humanitarian operations also have structures known as **inter-agency CBCMs** for handling SEA complaints by humanitarian workers. Although not limited to OCHA, these are reported on in the OCHA assessment, which states that in 2019-20, 12 of 28 operations (43%) reported having such a mechanism. The UNOPS assessment also notes that there was no evidence that UNOPS field offices are part of these mechanisms or of PSEA local networks despite encouragement from HQ to do so.

Training and awareness-raising

Element 4.7.4

Quality training of personnel/awareness-raising on SEA policies is conducted with adequate frequency.

Key findings: Five of six agencies were able to meet this benchmark and have programmes for SEA training and awareness raising. The available data show good rates of completion across agencies. However, these rates cannot be compared given that the size of organisations and the numbers of personnel vary as do the dates at which completion rates are calculated for the purpose of the MOPAN assessment, etc. All organisations except ILO demonstrate good rates of completion and confirm that the training is mandatory for all personnel.

All organisations have carried out some form of **personnel training/awareness-raising** *on SEA policies:*

- ⊙ **UNICEF:** training applicable to all personnel (including staff, individual contractors/consultants, standby personnel, interns, UNVs, etc.) and completed by 96% of personnel (14 652) as of 12 February 2020. The assessment reports that UNICEF had faced major challenges in adapting its innovative and interactive learning package on PSEA to make it available to regional and country office focal points for regular training and awareness-raising sessions, but that the issue appeared to be resolved by July 2021 when it was widely available through UNICEF's Agora platform.

- ⊙ **UNDP:** training reached 91% of staff and 87% of service contract holders (i.e., other types of personnel) in 2019. UNDP also established several awareness-raising processes and channels at HQ and country level including by ethics offices at the country office level, and by local PSEA focal points. The assessment notes, as under the previous benchmark, that the distinction between SH and SEA warrants further distinction in UNDP.

- ⊙ **OCHA:** a training course was completed by 77% of OCHA full- and part-time permanent staff as of December 2020. The course is integrated into OCHA's foundation training for all professional staff at P3 level and above, and for national officers. Awareness-raising was also found to take place with adequate regularity.

- ⊙ **UNOPS:** training had been completed by just under 75% as of March 2020 with further numbers having completed since then and some offices demonstrating 100% completion although the assessment report does not give up-to-date data at the time of finalisation of the assessment. Awareness-raising sessions had also been held across the organisation.

- ⊙ **UNEP:** as of May 2020, 70.5% of UNEP staff had completed the PSEA course, and this rose to 86% by 2 June 2021. Awareness-raising among staff and affiliated personnel was also being carried out.

- ⊙ **ILO:** the assessment said that ILO had started to introduce SEA training for staff but no data were available on completion rates.

The assessment reports do not explicitly state whether this has been done with **adequate frequency** but this can be inferred from the data showing high completion rates in all agencies except ILO. The ILO assessment found that SEA training was not being delivered frequently or consistently and that further work was needed, particularly at field level. There were plans for mandatory and online staff training. Awareness-raising was limited to a human resources department briefing in 2020 to senior management and an all staff working session. The regularity of training is also key. OCHA is planning to make its mandatory training an annual requirement for all categories of personnel to align itself with the UN-wide requirement for annual recertification. The UNDP assessment notes that it had no plans for follow-up courses at the time of the assessment.

None of the assessments address the requirement of "quality" training or what it means. They highlight other aspects of good practice but do not specifically mention the wording of the benchmark:

- ◉ Availability of access to policies, guidance and good practices to staff and partners, for instance through an intranet at OCHA and the external website at UNDP.

- ◉ Availability of materials in multiple languages is also key to accessibility. UNICEF states that its training was available in Arabic, English, French, and Spanish. UNOPS said it was distributing awareness-raising posters to field offices in French, Spanish, and Arabic.

- ◉ Adaptation of SEA training to local contexts for optimum effectiveness was emphasised in OCHA's strategy.

- ◉ Specialised training is not mentioned much save for the UNOPS report that mentions that some but not all PSEA focal points have had the chance to complete PSEA training. Whether this was more in-depth specialised training for the role or simply regular training was not clarified.

- ◉ Some agencies have taken the initiative to extend training to external actors.

  - ◉ UNICEF was particularly advanced in extending its training to implementing partners, including by making spot checks in some places to ensure that systems are in place. OCHA had plans to incorporate PSEA into external training programmes in tandem with its development of standards and due diligence processes and reporting requirements for implementing partners. UNDP had shared IOM's specialised training on working with implementing partners with all staff, although data on its dissemination and uptake had not been reported at the time of the assessment.

  - ◉ UNEP is the only one to mention awareness-raising among beneficiaries of assistance.

- ◉ There was also mention of multi-agency involvement, for instance, UNDP's participation in an inter-agency video messaging campaign and webinars on SEA prevention and response during COVID-19. ILO said it had been involved in piloting a multi-agency virtual reality SEA training course and participated in an online SEA prevention and response community of practice supported by the United States Agency for International Development (USAID) and the Ministry of Foreign Affairs of the Netherlands (as did other agencies not mentioned in MOPAN assessments).

- ◉ Under this benchmark, the ILO assessment also raised the issue of conflating SEA/SH and the need to ensure that staff are trained to understand the distinction as assessment interviews indicate that ILO staff used terms interchangeably. ILO has also been working on developing a global standard, the ILO Violence and Harassment Convention (No. 190). It claims that iy covers SEA and SH although the assessment notes that the term SEA does not appear in it.

Ensuring implementing partner accountability

Element 4.7.5

The organisation has clear standards and due diligence processes in place to ensure that implementing partners prevent and respond to SEA.

Key findings: The standards applicable are established by the 2018 United Nations Protocol on Allegations of Sexual Exploitation and Abuse Involving Implementing Partners. Some agencies have gone further to refer in their own strategies to the obligations of implementing partners. All are in the process of developing due diligence measures. UNICEF is the most advanced. Data provided in the assessment report substantiates how these standards are being applied. And although not expressly mentioned in the benchmark, some organisations, particularly UNICEF and UNDP, carry out partner capacity building alongside due diligence. The difference and challenge in applying these standards to governmental partners as opposed to non-governmental partner is highlighted in the UNDP assessment.

In terms of **standards**, the 2018 United Nations Protocol on Allegations of Sexual Exploitation and Abuse Involving Implementing Partners is the overriding policy document and applies to UN entity partners. The UNEP assessment report makes the point that, in common with other UN agencies, some donor partner agreements also have specific wording on PSEA. According to the UNEP report, they require grantees such as UNEP and its implementing partners to "take all reasonable and adequate steps to prevent sexual exploitation, abuse and harassment (SEAH) of any person linked to the delivery of the Donor Agreement by both its employees and any implementing partner, and to respond appropriately when reports of SEAH arise." Some agencies have made further organisation-specific commitments in their own strategy documents. For example, UNICEF's strategy makes it clear that its SEA strategy provisions are also binding on implementing partners and ILO's 2020 Directive is also applicable to all partners.

Most organisations have also developed **due diligence processes** *to apply these standards. MOPAN describes these as follows:*

- ⦿ **UNICEF**'s Procedure for Managing Risks of Sexual Exploitation and Abuse in Implementing Partnerships (2020) makes the assessment of a partner's PSEA organisational capacities a requirement for entering into a partnership. UNICEF has provided staff guidance on conducting PSEA assessments and a PSEA Assessment and PSEA Toolkit for CSO partners to help them strengthen their organisational capacity to address SEA. Country-level interviews highlighted the resource implications of PSEA compliance and that extra requirements inevitably require extra resources as offices otherwise have only limited ability to deal with concerns about system and partner weaknesses.

- ⦿ **OCHA**'s Grant Agreement Template with NGO implementing partners reflects SEA requirements, including the obligation to notify OCHA immediately of any SEA allegations, with the option of terminating the grant agreement if allegations are proven. OCHA has also developed SOPs for community-based pooled-fund implementing partners on responding to SEA cases, supported by training. Interviews suggest that pooled-fund grant agreements need to be further strengthened.

- ⦿ **UNEP**, in accordance with its 2020 PSEA Action Plan, is updating its legal agreement templates. The templates for projects with the Green Climate Fund have been revised and are in use and there are other templates for agreements for project cooperation and small-scale funding. Agreements for project agreements beyond the Green Climate Fund are still being revised. UNEP's internal grievance redress system under the revised safeguard framework, known as the Environmental and Social Sustainability Framework, is expected to make it easier to verify whether partners comply with these standards.

- ⦿ **UNDP** has a partner capacity assessment tool, and its legal office is currently updating relevant corporate contracts and agreements. It has included SEA prohibition in its standard administrative arrangements and has expanded its project document template to make the obligations of all implementing partners explicit.

- ⦿ **UNOPS** made it a key priority in 2020-21 to apply PSEA measures to implementing partners. The action plan template required field offices to adopt adequate safeguards, including screening, cooperative arrangements, monitoring, and termination arrangements.

- ⦿ **ILO** contracts for external providers (available in English, French and Spanish) were revised in 2020 to ensure compliance with the ILO SEA Directive and modifications are underway for other types of agreements: implementation agreements, long-term agreements, and non-standard and consultant agreements. These were due to be completed by March 2021 according to the 2020 Action Plan. SEA prevention and response in ILO still needs to be integrated further into partner programming tools such as checklists, guidelines, and templates.

The **UNICEF** assessment stands out for providing data on the **application of these standards**. UNICEF has systematically applied partner capacity assessment/screening to determine a partner's SEA risk and has implications for the ability and scope for country offices to partner with organisations that do not have full PSEA organisational capacities, including risk-mitigation measures. As of 1 September 2021, of 4 065 partners who were assessed, 21%

were found to be high risk, 45% to be moderate risk, and 33% to be low risk. Other assessments report that due diligence is taking place routinely but do not provide data (e.g., UNDP, OCHA) or cite *ad hoc* examples without making it clear whether the approach is applied systematically (e.g., UNOPS).

The partner surveys carried out for the MOPAN assessments give some insight into how far these measures are being implemented:

- The **UNICEF** partner survey shows that the large majority of those surveyed (86%) agree that UNICEF requires its partners to apply clear standards for preventing and responding to sexual misconduct in relation to host populations.
- The **UNEP** survey showed that some 54% of respondents agreed that UNEP required clear standards but that one-third (35%) did not know that this was a UNEP requirement.
- The **ILO** assessment says that the majority of partner respondents agreed that the ILO applied clear standards.

Building the capacity of partners

Some agencies recognise that building partner capacity is needed alongside requirements:

- **UNICEF** makes its PSEA training available to implementing partners in English, French, Spanish and Arabic through the online system Agora. As of the MOPAN assessment, almost 9 000 non-UNICEF individuals had taken the course, many of whom were working for implementing partners. The course was being upgraded and being made available in additional languages (Russian and Portuguese).
- **OCHA** makes training, awareness-raising material, and resources available to implementing partners.
- **UNDP** emphasises "capacity building" alongside its due diligence. It was rolling out specialised training developed by IOM on working with implementing partners and initiated a series of webinars on SEA (and SH), which are currently available through the Enterprise Risk Management website with implementing partners and responsible parties (e.g., private sector). The UNDP assessment report makes the important point that nearly 80% of UNDP's implementing partners are either national or sub-national governments (and the UN Protocol on implementing partners includes "government institutions") that typically have different legal norms and treat SEA differently, as the Independent Review carried out by UNDP/UNFPA pointed out. In response to this, the SEA/SH task force developed a template communication to implementing partners. According to UNDP stakeholders consulted, UNDP does not see its role as obligating its government partners to adopt UNDP's definition, response, or investigation process for preventing and responding to SEA, but as helping to build capacity to prevent and respond to SEA over time. The assessment report concludes that it will be important to track the implementation of the protocol, particularly with regards to governmental partners. It notes that there is scope for tensions and risks: UNDP's Office of Audit can investigate SEA allegations involving implementing partners where UNDP personnel are the subject but cannot investigate SEA/SH claims against its implementing partner staff and must rely fully on their investigative capacity in those cases.

Inter-agency efforts

Element 4.7.6

The organisation can demonstrate its contribution to inter-agency efforts to prevent and respond to SEA at field level, and SEA policy/best practice co-ordination fora at HQ.

Key findings: All organisations participate in inter-agency efforts to some degree at HQ level depending on their role in the UN family of organisations, with OCHA taking a particular lead in co-ordination. UNICEF has also been very pro-active in engaging with inter-agency efforts. The majority of agencies are good at engaging with HQ level initiatives but field level engagement is weaker. Only UNICEF and OCHA provide evidence that they are making efforts to engage among agencies.

At **HQ level,** OCHA's Under-Secretary-General, as chair of the Inter-Agency Standing Committee, works to raise the profile of PSEA across the humanitarian system. After IASC principals agreed in June 2018 a chair's statement outlined IASC's collective commitments to tackling SEA, including sector-wide action especially in referencing and strengthening investigations capacity, for which inter-agency task forces have been established. In 2018, OCHA created the SEA/SH Investigations Fund to provide rapid grants to IASC organisations and affiliated partners to help ensure the appropriate investigation of SEA/SH allegations. OCHA also chaired the IASC Technical Experts Group on PSEA, participated in the advisory board of the Inter-Agency Misconduct Disclosure Scheme, and contributed to other global inter-agency work on SEA policy and on best practices such as information on SEA in the 2019 Global Humanitarian Overview and a technical note, Protection from Sexual Exploitation and Abuse, during the COVID-19 response.

UNICEF has been the most proactive on PSEA inter-agency work by championing this agenda in the IASC in 2019 and by engaging in different work streams. As of 2021, UNICEF had been involved in several key initiatives since 2016, including a high-level UN system steering group on PSEA, developing a harmonised tool for assessing partner capacity, certifying that allegations were reported and that training was offered, contributing to an inter-agency training package, and developing common humanitarian PSEA priorities in the COVID-19 response.

Other agencies participate as members of inter-agency initiatives:

- ⊙ **UNDP** is a member of the UN High-level Steering Group on SEA, the System-wide UN SEA Working Group, and the Inter-Agency Steering Committee Priority 2 Results Group on Accountability and Inclusion, the joint Chief Executives Board Task Force/IASC (system-wide efforts to strengthen investigative capacity), and the UN ClearCheck system (database to prevent re-hiring SEA/SH perpetrators). With the UN Development System Reform, UNDP's SEA focal points have been working in the inter-agency UN Country Team SEA working groups alongside other agencies under the guidance of resident coordinators. In 2019, UNDP also participated in a joint independent review of its SEA/SH policies with UNFPA and UNOPS.

- ⊙ **UNOPS** is a member of the UN Representatives of Investigative Services who collaborate on PSEA/SH issues and participate in UN ClearCheck. The assessment also mentions that UNOPS PSEA focal points participated in the UNFPA-led PSEA workshop in October 2019 and are members and participated in bi-weekly meetings of the UN PSEA Task Force led by the office of the special coordinator.

UNEP and ILO give least evidence of participating in inter-agency efforts. The UNEP assessment says that it makes some contribution to inter-agency efforts, but gives few examples aside from participating in the UN SG's twitter campaign on eradicating SEA in UN operations, and having UNEP SEA focal points at monthly UN Secretariat working group meetings. The ILO assessment cites annual management certifications being submitted to the UN SG since 2018 and participation in UN ClearCheck.

At **field level**, the OCHA report states that OCHA has worked with UNICEF and other IASC members to develop an IASC PSEA Country-Level Framework template with results-based indicators for adoption at country level. It has integrated PSEA into the Humanitarian Programme Cycle by including specific questions on PSEA in multi-sector needs assessments. At the country level, the inter-agency Protection Standby Capacity Project and Gender Standby Capacity Protect advisers contribute to promoting PSEA as part of wider agendas on protection and gender equality. They promote its inclusion as a standing agenda item in humanitarian country team meetings, providing technical expertise to other agencies and partners, supporting PSEA networks and community-based complaint mechanisms, and hosting skills- and awareness-raising workshops. OCHA field offices work to raise awareness about the rights of affected populations. Whereas these mechanisms are in place, many of OCHA's partner organisations who responded to MOPAN's survey said that they were unaware of OCHA's work on field-level inter-agency efforts to tackle SEA.

The UNICEF assessment cites various examples of inter-agency engagement at field level:

- ⊙ Active support to the inter-agency PSEA network in Haiti.

- ⊙ UNICEF's IASC Championship 2018-19 focused the agenda on strengthening country-level systems for SEA prevention and response and put forward an IASC Strategy on PSEA/SH in November 2018 that led to the December 2018 IASC Plan for Accelerating PSEA in Humanitarian Response at Country Level.

- ⊙ UNICEF and UNHCR co-chair the IASC Results Group 2 on Accountability and Inclusion, which includes a Technical Expert Group on PSEA comprised of UN agencies and international NGOs.

- ⊙ UNICEF seconded a staff member to co-ordinate the team deployed to the Democratic Republic of the Congo in response to allegations. The team provides ongoing support to 50+ inter-agency PSEA co-ordinators and co-chairs.

- ⊙ To track progress, UNICEF developed and launched an IASC PSEA website and global dashboard that has been used by more than 30 000 users across six regions.

- ⊙ UNICEF is described as the first agency to integrate PSEA into its COVID-19 response from the outset, which led to the development of the IASC PSEA and COVID-19 Interim Guidance Note; UNICEF, the IASC Secretariat, and UNFPA developed interim guidance for integrating PSEA in the Global Humanitarian Response Plan and led webinars for PSEA Coordinators in 30+ countries to roll it out.

- ⊙ In country offices, UNICEF committed USD 21.6 million in 2018-19 to six regional offices and 32 priority countries facing humanitarian emergencies to accelerate work on PSEA. It integrated the IASC Acceleration Plan into its internal PSEA results monitoring to track progress and used the funds to strengthen inter-agency capacity to deliver on the IASC priority outcomes.

- ⊙ The survey carried out by MOPAN points to partners at country level tending to agree (76%) that UNICEF participates in joint/inter-agency efforts to prevent, investigate, and report on any sexual misconduct by personnel in relation to the host population.

The remaining assessments provide little evidence of field level inter-agency engagement. UNOPS guides field offices to join local PSEA networks and participate in CBCM where they exist but the assessment provides little evidence of how this is taking place aside from ad hoc country-specific examples. ILO efforts at field level are less developed according to the assessment: there is no formal network for addressing SEA and only general guidance in the ILO Directive that offices may use inter-agency CBCMs where they exist. The survey responses appear to contradict this as the assessment states that ILO partner survey participants agreed that the ILO participates in joint/inter-agency efforts to prevent, investigate, and report on any sexual misconduct by personnel towards host populations. Because UNEP's country presence is limited, inter-agency efforts at that level are constrained. The partner survey finds that the largest share of responses (59%) about any knowledge of UNEP's inter-agency efforts in tackling SEA was "don't know".

Action in response to allegations

Element 4.7.7

Actions taken on SEA allegations are timely and their number related to basic information and actions taken/ reported publicly.

Key findings: All meet the requirement of public reporting as they are part of a standardised system in line with the UN SG annual reporting on special measures to tackle SEA. Some assessments also demonstrate other ways in which agencies publicly report information about allegations and action taken. However, when it comes to timely actions, only two agencies - UNICEF and UNDP - demonstrate concrete efforts to make their responses timelier.

All the assessed agencies, alongside other UN entities, **publicly report** allegations annually as part of the UN Secretary-General's Special Measures for Protection from Sexual Exploitation and Sexual Abuse report to the UN General Assembly. The OCHA report describes this as the UN's centralised PSEA reporting system that maintains a publicly accessible summary database of allegations, the status, and process timelines for each allegation, and the action taken once the process has been finalised. As participating members of this reporting system, UNOPS, OCHA, and UNDP reports refer to the use of the iReport SEA Tracker to report to the SG in real time saying that 25 UN entities are part of this system.

Some assessment reports cite additional ways in which the information is publicly reported:

⊙ **ILO** reports allegations and actions taken on SEA through the annual report of the office of the internal auditor, which is also presented to the governing body.

⊙ The **UNOPS** Executive Director reports allegations in the UNOPS Annual Report.

⊙ The **UNDP** Administrator annually reports all disciplinary measures and actions taken in cases of misconduct, including on SH and SEA, in the UNDP Annual Report of the Administrator on Disciplinary Measures and other Actions Taken in Response to Fraud, Corruption and other Wrongdoing.

The assessments contain the following information about reports of SEA per agency, although it is difficult to draw any conclusions from the data given the piecemeal nature of the information and the lack of comparability of timeframes, agency size and scale, and the strength of the complaints mechanisms and reporting systems:

⊙ **ILO:** No allegations were reported of SEA involving ILO staff in the first three years of reporting (2018, 2019, 2020); one allegation was reported against a third party (implementing partner) in 2019. The mandate of the internal auditor to address SEA only started on 11 November 2019.

⊙ **OCHA:** Reported five cases as of the date of the MOPAN assessment. Those were investigated by the UN Office for Internal Oversight Services (as OCHA has no internal investigative capacity).

⊙ **UNDP:** From 2018-20, UNDP submitted 15 allegations of SEA through the system-wide reporting mechanism. The 2019 Annual Office of Audit and Investigations report states that complaints related to sexual misconduct (including both SH and SEA) comprised 8.4% of the cases that the office received in 2019, down 2.5% from the 10.9% in 2018. Of these, 3% (11 cases) related to SEA, of which two were substantiated.

⊙ **UNEP:** Two UNEP staff members were separated from the organisation because of SEA during 2020-21.

⊙ The **UNICEF** assessment notes that of 364 cases investigated in 2019 by its Office of Audit, 29 were for SEA allegations.

⊙ **UNOPS:** no data presented in the MOPAN assessment.

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Regarding **timeliness,** *some agencies are reported to have set specific benchmarks for investigations.*

- ◉ The **UNDP** assessment says that the organisation reports allegations in a timely manner in line with the inter-agency agreement within the UN to report cases to the UN Secretariat. The office of audit has taken steps to strengthen and accelerate investigation processes by adding capacity to UNDP's investigation function to meet the benchmarks for finalising investigations of misconduct within six months. Between 1 January 2019 and 16 December 2020, it reported an average timeline for investigating SEA cases of between 5.2 to 6.3 months. UNDP has developed guidance for personnel to report allegations of SEA to the office of audit within 36 hours.

- ◉ **UNICEF**'s strategy includes provisions to ensure that investigations of and sanctions for SEA allegations are swift and credible. It reported that as of September 2021, it had spent an average of 6.3 months on each case it closed and that 89% of SEA cases were closed within 9 months.

- ◉ **UNOPS** action plan includes a key indicator stating that investigations should start within three months and information about the outcome should be shared with the complainant.

- ◉ **ILO**'s directive says that allegations should be dealt with "promptly" but sets no targets for the timeliness of responses.

- ◉ Both the **OCHA** and **UNEP** assessment reports state that the timeliness of the response is beyond the control of these agencies as the investigations are undertaken by the UN Office for Internal Oversight Services. Delays were also caused by the COVID-19 pandemic. The OCHA report concludes that actions taken are "timely (though a few cases have dragged on for years)" citing cases that took from under two months to over four years.

Other features highlighted that are not part of this benchmark include:

- ◉ Failure to act also constitutes grounds for investigation and disciplinary action. The UNDP assessment says that cases of SEA are reported along with cases where senior staff "were negligent in sharing allegations of SEA with the subject of the allegations".

- ◉ Referral to criminal authorities where appropriate. UNDP also commits to promptly reporting to the UN Office of Legal Affairs all credible allegations of SEA for referral to national authorities for possible criminal accountability. In 2020, this led to criminal charges against a former staff member by national authorities.

- ◉ Public sanctioning of implementing partners. The UNOPS Internal Audit Group has referred suppliers/implementing partners to the vendor review committee for SEA violations (i.e., where the organisation has failed to properly report, investigate or handle PSEA violations). The list of sanctioned vendors is publicly available. The 2019 annual report of the internal audit and investigations office lists substantiated investigations cases in 2019 that include the summary of one SEA case.

Victim-centred approaches

Element 4.7.8

The organisation adopts a victim-centred approach to SEA and has a victim support function (stand-alone or part of existing structures) in line with its SEA exposure/risk.

Key findings: The assessed agencies do not generally meet this element well. The need to adopt a victim-centred approach and include it in most organisational strategies is recognized (UNDP, UNICEF, UNOPS and OCHA) but there is very little evidence of victim-support functions or practical assistance; only UNDP and UNICEF can demonstrate such efforts. References to CBCM , an important inter-agency vehicle for handling complaints and providing support to victims, are limited, except in UNDP's assessment.

Agencies are just starting to adopt **a victim-centred approach.** The key UN policy on a victim-centred approach is the 2020 UN Protocol on the Provision of Assistance to Victims of SEA, but few of the agencies are reported to be making explicit reference to it or to a victim-centred approach in general:

- ◎ **UNDP**'s action plan commits to the principles of the UN Victim Assistance Protocol and to coordinating as relevant with the UN Victims' Rights Advocate. The assessment refers to the draft strategy and refers to the need for its response to SEA to be victim/survivor centred, to providing multiple channels for reporting and ensuring confidentiality, and to providing services to those who have experienced GBV. UNDP's policies require the organisation to update victims/survivors at relevant points throughout the investigation process. The office of legal services informs victims/survivors at the end of their legal review when the perpetrator is a staff member. A model information sharing protocol is being developed to govern how information on SEA allegations is shared at the country level.

- ◎ **UNICEF**'s strategy refers to the UN Victims' Assistance Protocol and contains provisions for implementing a victim-centred approach requiring access to quality, survivor-centred assistance, and support.

- ◎ **UNOPS**' strategy references a victim-centred approach. There is written guidance and a "Manage Protection of Victims" process in the UNOPS internal policy tool, the Process and Quality Management System. Established in February 2019 it includes the provision of victim assistance (including families, for example, children born as a result of SEA.) The assessment found further intent to strengthen country-level capacity to report complaints and support victims by expanding the internal PSEA community. The UNOPS Internal Audit Group has provided direction on how to adopt a victim-centred approach by prioritising these cases, establishing shorter deadlines for opening and completing investigations, and ensuring regular contact with the victim.

- ◎ **OCHA**'s SOP has started to operationalise the principle that the safety and dignity of the victim is and always remains a priority. It thus requires OCHA PSEA focal points to be aware of General Assembly Resolution 62/214 on support to victims of SEA and to give due consideration to victim assistance, with special consideration for cases involving children (including consultation with UNICEF).

- ◎ **ILO** had not yet subscribed to the inter-agency 2020 UN Protocol on the Provision of Assistance to Victims of SEA at the time of the assessment, but according to the 2020 PSEA Action Plan, it was considering participation. Nor did the assessment find any evidence of any specific victim/survivor-centred approach to investigations, information-sharing or other processes connected to SEA.

On victim support functions, the overall picture across agencies shows limited practical support to victims.

◉ The **UNICEF** assessment says that in 2019, its office of internal audit reviewed its internal procedures to adopt a victim-centred approach to reporting PSEA/SH and to further expand the function once additional staff were on board, noting that investigators were being trained. The report cites an example of one country where a comprehensive system was in place (call centres for complaints, processing, and referrals to the office of audit and investigation, and third-party monitoring). The assessment concludes that while it was costly to put this in place, it was essential for accountability, especially in fragile and conflict-affected countries where quality survivor services are often lacking, and that such systems needed to be built and services made available even at the reporting stage.

◉ **UNDP**'s strategy and action plan commits to mapping available local/national SEA victim/survivor support services. However, it does not explicitly indicate what counselling services are available for them (UNDP personnel are served by UNDP's in-house counselling service). The assessment cites a recent country office survey (to which 98 countries responded), in which 71% of the respondents confirm that local victim/survivor support service providers (national or local GBV centres) have been identified to assist SEA victims/survivors. While this reflects significant gains, it also shows that there is much to be done (in nearly 30% of country offices). The UNDP assessment also reported that its specialist SEA investigators made a particular effort to keep the alleged victims/survivors informed during the investigation stage and that confidentiality was strictly maintained in accordance with due process.

◉ **OCHA**'s assessment says that in most of the countries where it works, there is a functioning PSEA network that maintains a PSEA victim assistance/referral protocol. However, the quality of PSEA referral services tends to depend on the quality of the country's wider GBV services. The assessment did not find evidence of active support to victims but rather a continuing prioritisation of the potential adverse effects on OCHA on public relations and media relations.

◉ **ILO** has no specific support function for SEA victims, nor does it have a partnership with a relevant service provider for this. It informed the assessment that it would seek support from existing services and programmes for victims in the UN system.

As for taking measures commensurate with the **level of SEA risk**, none of the assessments explicitly address this. However, the UNEP assessment says that its lack of country presence means that it must rely on other UN entities to provide direct support and services. The UNOPS assessment found no current victim support mechanism in place at the field level, which was attributed to the nature of how UNOPS' works with partners, and that "PSEA focal points work with partner agencies rather to understand their own mechanisms".

CBCMs are an important UN inter-agency effort to facilitate complaints from and support to victims/survivors but the assessment reports make little reference to them.

◉ The **UNDP** report is the only one to describe these in detail saying that they are used in multiple settings and that support to victims/survivors is provided through partnerships with other UN agencies and NGOs at country level. Specific guidance was issued to all UNDP country offices on the importance of CBCMs for SEA victims. The assessment report contains some data showing a few cases assisted through this mechanism but a 2019 independent review of UNDP's system indicates that there is no consistent well-embedded system-level response for victim/survivor support. UNDP operates on a case-by-case basis depending on the availability of CBRM and counselling practitioners, but had found that early pilots of the mechanisms were unsustainable for lack of funding.

◉ The **UNOPS** assessment refers in passing to a poorly understood and implemented CBCM in one country location.

Risk management

Element 5.4.5

Detailed risk (strategic, political, reputational, operational) management strategies ensure the identification, mitigation, monitoring, and reporting of risks

Key findings: Most agencies have considered risk management in relation to SEA but are generally not advanced in developing their strategies or implementation. UNICEF may be the most mature of the six agencies in this regard; the assessment confirmed that SEA risk assessment is taking place in practice.

All five agencies report having or developing a strategy *for assessing SEA risks:*

- ⊙ The **UNICEF** assessment finds this benchmark to be substantially achieved because PSEA is a core element of the Enterprise Risk Management framework that all country offices must apply and that UNICEF has also developed procedures for managing SEA risks in implementing partnerships.

- ⊙ **UNDP**'s Enterprise Risk Management Framework was revised in 2019 to include SEA as a risk sub-category. The UNDP assessment says that, based on its business model, the organisation primarily interacts with government counterparts and rarely with host populations. Intervention designs are required to consider the impact on local populations in line with project quality standards set out in various guidance documents that were revised in 2019 to cover SEA and GBV risks. In 2019, UNDP, UNFPA, and UNOPS jointly underwent an external independent review of their SEA and SH policies and procedures.

- ⊙ The **OCHA** assessment mentions that SEA is one of seven headline risks in OCHA's overall risk register and that the risks of other misconduct towards host populations are not covered, but it does not specify the framework through which they are assessed.

- ⊙ For **UNOPS**, the issue is a work in progress. The report says that the architecture of identifying and managing PSEA risks is being developed.

- ⊙ **ILO** considers itself less exposed to this type of risk compared to other UN agencies, given the nature of its normative work and limited direct contact with end beneficiaries. However, the potential is growing as ILO projects that it will serve vulnerable populations increasingly. The ILO assessment says that the potential risk of sexual abuse and other misconduct has become a higher priority within the ILO with the introduction of the Directive on the Prevention and Response to Sexual Exploitation and Abuse and the action plan. The senior risk officer advises on SEA-related risks during the development phase of major projects and many donors include clauses about SEA as a standard component of agreements. ILO is therefore working to include the assessment of these risks in its standard contracts, but the assessment has not yet found this to be a priority or an integral part of contextual analyses in country risk registers, project risk registers, and decent work country programmes risk analyses.

Regarding **implementation**, only the UNICEF assessment draws a definitive conclusion that the risk assessment process is working. Interviewees indicated that country offices monitor PSEA risks very closely. There is otherwise little to no information on implementation. The OCHA assessment says that the risk register is not actively used. The UNDP report refers to a zero-tolerance policy for SEA involving UNDP personnel, and personnel of the UNDP implementing partner and responsible parties but does not detail how this is implemented.

Performance against SH benchmarks

This section looks more closely at the content of the assessments on the benchmarks for the protection from sexual harassment to see what this says about performance by agency and across agencies. The report sets out key findings by benchmark alongside a fuller analysis showing how the requirements are or are not met. The analysis shows that agencies vary in their ability to meet the various requirements, some of which are more challenging than others. It also shows that some agencies are better able to meet the requirements than others.

Policy framework

Element 4.8.1

Organisation-specific dedicated policy statements and/or codes of conduct that address SH are available, aligned to international standards and applicable to all categories of personnel.

Key findings: All agencies have organisation-specific dedicated policies or codes pertaining to sexual harassment. In the case of ILO, however, these needed to be updated at the time of the assessment. Most organisations reference the 2018 UN Model Policy, the main international standard applicable. Only two reports make it clear that the policies are applicable to all categories of personnel, but this may be due to a lack of information in the other assessment reports. None of the assessments provide much information on implementation.

The main relevant **international standard** is the 2018 UN Model Policy developed by the inter-agency working group under the High-Level Committee for Management of the UN Chief Executives Board and UN Staff Rules and Regulations. Known as the United Nations System Code of Conduct to prevent harassment including SH at UN system events it includes a Model Code of Conduct that is explicitly referred to by some agencies in their own policies.

Most organisations have **dedicated policies/strategies/codes** and refer explicitly to the applicable international standard as well:

- ⊙ **OCHA** has a dedicated policy statement and 2020 standard operating procedures on sexual misconduct that addresses SH and references the 2018 UN System Model Policy. Its people strategy makes SH prevention an overarching priority and also refers to the 1992 UN Secretariat policy on the equal treatment of men and women in the secretariat and the prevention of SH in the workplace.

- ⊙ The **UNDP** Policy on Harassment, Sexual Harassment, Discrimination and Abuse of Authority, updated in 2018, is aligned with the UN Model Policy. UNDP also has a code of ethics that bans SH of all types. The policy provides a comprehensive definition of the conduct that constitutes SH, making it clear that SH applies to misconduct in the workplace, and delineates the expected conduct of UNDP personnel.

- ⊙ The **UNOPS** Prevention of Sexual Harassment and Sexual Exploitation and Abuse Strategy integrates the UN Model Code of Conduct in the July 2019 Programme Quality Management System process, Manage Workplace Environment. The strategy also refers to the Charter of the United Nations, to the Standards of Conduct for the International Civil Service, and the United Nations Staff Regulations and Rules.

- ⊙ **UNICEF** has a 2018 strategy to prevent and respond to SEA and SH that was updated in 2020 on prohibited conduct that includes PSEA/SH (to include anonymous reporting and remove the statute of limitations). In addition, it developed a values charter articulating UNICEF's core values and behaviours for all personnel, including specific statements against discrimination and harassment. The assessment does not explicitly mention adherence to international standards, but the assessment may have missed this detail. The 2019

report of the independent task force found a UNICEF workplace culture of "results at any cost" that enabled gender-based discrimination, SH, harassment and the abuse of authority.

- ⊙ **UNEP** has no specific dedicated policy statement or code of conduct. In 2020 it circulated the UN Model Code of Conduct and a memo from the executive director reminding staff of their obligations. The assessment also says that UNEP applies the UN Secretariat's policies and directives on SH.

- ⊙ **ILO** policies appeared outdated to the assessment. ILO issued a SH policy and procedures circular in 2004 that sets out the SH policy and procedures and applies to all categories of personnel. SH was addressed in the 2009 staff principles of conduct that was updated by a 2014 collective agreement between the ILO and its staff union on resolution timeframes. The assessment found that the current policies needed to be improved in several respects: to allow for anonymous allegations; more flexible time limits for lodging a complaint (the limit currently is six months); giving non-staff, such as interns, the same opportunity as staff to appeal decisions to the ILO Administrative Tribunal; greater protection from retaliation, and the ability to lodge a second complaint and to request an independent external opinion. The ILO has also established and championed new global standards (Convention No. 190) aimed at ending violence and harassment in the work world, applicable to all workplaces globally (including the ILO). Interviews suggested that the ILO considers the 2018 UN Model Policy does not go as far as ILO Convention 190, which better articulates the spectrum of unacceptable behaviours and the intersectionality of different forms of discrimination. In any case, ILO documents did not refer to the ILO Convention 190, or the UN Model Policy at the time of the assessment. The assessment found that more collaboration on the subject was needed in the UN system.

The assessments mostly do not say whether policies apply to **all personnel.** The UNDP report specifically states that the policy covers all personnel, including staff members, independent and service contractors, UN volunteers, and interns. The policy outlines the "special obligations" of managers and supervisors. The UNICEF assessment also states that the core values and behaviours apply to all personnel.

Regarding **implementation**, *the assessments provide little information about progress:*

- ⊙ **UNOPS** has an organisational action plan for SH prevention that has been distributed to offices identified as high-risk duty stations to assisting them in creating local action plans. The assessment heard that some offices had developed such country plans but did not see these documents.

- ⊙ **UNDP** assessment highlights that personnel and managers are not always empowered to address complaints about behaviour, which may also include complaints of SH. As they do not necessarily see ethics and conduct issues as part of their duties, they delegate them to the ombudsman's or ethics offices. The assessment reports that the 2018 UNDP Global Staff Survey indicates that 62% of UNDP staff think their management team effectively manages conflicts and grievances in their office, while more are neutral.

Tracking policy implementation

Element 4.8.2

Mechanisms are in place to regularly track the status of SH policy implementation at HQ and at field levels.

Key findings: Some of the agencies (UNDP, UNICEF, UNOPS, ILO) are reported to have mechanisms for tracking policy implementation of at HQ level. The assessments contain very little information on field-level mechanisms. Therefore, the benchmark is not substantially achieved overall.

Four assessments (UNDP, UNICEF, UNOPS, ILO) provide some information on **mechanisms to track HQ policy implementation:**

◉ The **UNDP** report gives the most detail. It says that a task force of specialised units in the organisation will track the impact of the action plan for the number of reported SH cases, of retaliation cases related to SH, and for the time taken to investigate and act on a case. This includes increasing awareness, building capacity, integrating SH safeguards, preventing SH perpetrators from joining the UNDP workforce, continuing to revise the SH policy, improving reporting and investigation of SH allegations, and enhancing the response to victims. It further states that progress is tracked and reported through different mechanisms. There is progress both at the local and corporate level, with accountability for action clearly vested in the heads of offices/bureau directors and the administrator, who reports to the executive board. The assessment concludes that while the action plan sets out accountability indicators for managers and resident representatives, thus serving to embed the SH policy, many of the indicators are stand-alone or binary and will need to have mechanisms to improve them over time, to be embedded in UNDP's broader organisational effectiveness scorecard, and to be resourced to be meaningfully tracked. There is further information on reporting mechanisms under the next benchmark (see below).

◉ The **UNICEF** report also identifies some tracking mechanisms. UNICEF established a D1 level post for a principal advisor on organisational culture to implement the recommendations of the 2018-19 independent task force and monitor and report to the executive board and to the public.

◉ The **UNOPS** report states it has mechanisms to track the implementation of the SEA strategy but does not specifically reference SH. A task force is to meet regularly to oversee strategy implementation and agree on key implementation milestones. The strategy commits to monitoring performance and the 2020 annual report includes an update on activities for PSEAH. In 2019 an independent review on SH and PSEA was conducted by Deloitte with UNDP and UNFPA and actions were taken to implement recommendations.

◉ The **ILO** assessment says that the overall implementation of the policy addressing SH at the HQ and field levels is monitored by the joint negotiating committee (formed by the staff union and the ILO) according to the collective agreement.

There is no information in the assessments on how implementation is tracked at **field level** except for a passing reference in the UNDP assessment saying that UNDP Resident Representatives are accountable for reporting on country-specific action plans to bureau directors who in turn report to the administrator.

Even where mechanisms are referenced, there is little information on **implementation:**

▷ The **UNICEF** assessment finds this benchmark to have been substantially achieved in terms of implementation as it identified a progress update on UNICEF's work to improve its organisational culture and actions taken to implement its strategy to prevent and respond to SEA and SH. It did not elaborate on them, however.

▷ The **OCHA** assessment did not find evidence of reporting on the implementation of its SH policies to the executive board. Following a negative evaluation in 2018, OCHA revised its SH-related structures and processes, but the assessment has not yet found evidence about whether OCHA has addressed cultural issues or restored staff confidence in the grievance mechanisms. The report mentions that OCHA tracks compliance for mandatory training, including on SH, and attendance at mandatory training is assessed as part of staff appraisals.

▷ Likewise for **ILO**, the assessment could not find documents showing how monitoring was being carried out aside from regular briefs to the senior management team on the measures taken to implement the SH policy.

In the UNEP assessment, **tracking allegations** is conflated with tracking policy. The UNEP assessment reports only on allegations tracking and refers to UNEP's investigation on the number of allegations between January 2019 and April 2020 and how they were resolved or were being investigated by the UN Office for Internal Oversight Services.

Resources and structures for policy implementation

Element 4.8.3

The organisation has clearly identifiable roles, structures, and resources in place to implement its SH policy/ guidelines at HQ and in the field: a support channel for victims, a body co-ordinating the response, and clear responsibilities for following up with victims.

Key findings: All organisations have structures at HQ level for implementing SH policies. UNICEF, OCHA, UNDP, and UNOPS reports all specify a coordinating body with overall responsibility in line with this benchmark. UNDP and UNOPS also mention practical initiatives for providing support to victims. There is very little information of country level structures except for UNICEF. ILO and UNEP emerge as having the fewest mechanisms and least co-ordination on this issue at HQ and in the field. Only one report (UNOPS) addresses the question of dedicated financial resources and admits that they are lacking. Overall, four agencies – UNICEF, OCHA, UNDP, UNOPS – do better for different reasons, and two – ILO and UNEP – are weaker.

The assessments find that all organisations have some structures and roles responsible for tackling SH at **HQ level:**

- ⊙ The **UNICEF** assessment reports that this benchmark is substantially achieved. It justifies this by the 2019 creation of a position focused on SH at HQ/office of the executive director. It further reports UNICEF that interviewees indicate that a senior culture change advisor was appointed for two years to implement the internal task force recommendations (the first full-time position focused on organisational culture in the UN system) by working with the division of human resources, other divisions, regional offices, and the staff association.

- ⊙ **OCHA**'s SOP sets up identifiable roles, structures, and resources for the implementation of its policy on SH at HQ and in the field under the overall responsibility of the Under-SG. In addition, OCHA has adopted the UN Secretariat's undated Guide for Managers: Prevention of, and Response to, Sexual Harassment in the Workplace stipulating that managers are responsible for the care of personnel under their management and are required to respond promptly to allegations of SH. The human resource section plays an advisory role, and two dedicated focal points have been appointed for this purpose. The people strategy management committee has overall responsibility for care, including SH, and meets twice a year to review policies and critical incidents. The sexual misconduct SOPs also cover responsibilities for following up with victims. Some of these improvements occurred after a 2018 evaluation that found weaknesses in OCHA's structures and processes for responding to SH, especially in the field. OCHA updated its SOP and expanded its staff training on both PSEA and SH but has not yet conducted new research to assess to what extent staff confidence in the mechanisms has improved.

- ⊙ **UNDP** has a multidisciplinary SEA/SH task force SH and SEA prevention in place, with representation from country offices and HQ. Launched by the administrator in February 2018, it meets monthly, and regularly reports to the administrator. In addition, the ethics office, the ombudsman's office and the legal office have designated roles for responding to SH. Support for specialist counselling services is provided through the Rome Institute for UNDP personnel-victims/survivors of SH in the workplace, plus four additional in-house counsellors. The UNDP Office of Audit has dedicated investigators for SH cases. The UNDP Office for Human Resources of the Bureau for Management Services has a focal point on SH. The UNDP provides information on reporting channels:

  - ▸ Executive Group of Assistant SGs and the Organisational Performance Group of Deputy Directors (11 discussions between 2018-20).
  - ▸ Assistant SGs/Bureau Directors and Heads of Independent Offices report to the administrator/associate administrator on SH and SEA-related indicators in their annual performance compacts.

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- ⊙ Regular reporting to the executive board.
- ⊙ Annual submission of SH and SEA Action Plans by all offices across the organisation.
- ⊙ Annual management letters to the UNDP Executive Board and the UN SG outlining UNDP's response to SEA/SH.
- ⊙ Reporting to the executive board on the 2020 survey of 130 UNDP country offices on their response to SH and SEA.
- ⊙ Assistance and guidance to victims provided through multiple channels: the ethics office, the ombudsman's office, the office of human resources, an external helpline, peers and staff council, supervisors, staff counsellors, counselling through UN Critical Incident Stress Management counsellors who provide support globally, respectful workplace facilitators, and the Rome Institute, which delivers telehealth counselling services for SH victims/survivors.

⊙ **UNOPS** has an internal task force team at HQ that oversees the delivery of the SH/SEA strategy. Although SH cases are investigated by professional investigators, a dispute resolution and fact-finding mechanism known as the network of peers also exist as per Deloitte's s recommendation of it as a best practice in its review of UNOPS. This aims to address internal grievances related to harassment, abuse of authority, and discrimination and facilitates the support of peers who serve as an additional source of support to victims; personnel are elected and trained on the basis of their competencies and leadership capabilities. The assessment was unclear about whether there are dedicated SH focal points in the organisation, unlike for SEA, where there are more formal focal points. However, UNOPS has established SH practices such as offering psychological support and coaching.

⊙ **UNEP** reports clearly defined roles, structures, and resources as of May 2019. They involved appointing an interim focal point for SH (a senior legal officer) to be complemented by the chief of human resources and designating the acting chief of staff as UNEP's focal point for whistle-blower protection and the director of corporate services as the interim focal point for protection against retaliation.

⊙ The **ILO** assessment finds that roles and structures are set out in the policies, although how they co-ordinate and work together is not always clearly defined. The main responsibility lies with the human resources department. The ILO Mediator and the ILO Staff Union have a potential role in providing staff assistance for support for a SH allegation and informal resolution, but their roles are not defined further. There is a structure in place for formal resolution (appointment of a qualified independent external investigator) and the legal advisor also plays a role. There is a mechanism to protect SH whistle blowers from retaliation that involves the ethics officer and the office of the internal auditor. Several recent improvements include the investigation unit taking on cases even in the absence of a formal complaint.

A few reports give limited information on how these structures apply at **country level.** The OCHA mechanisms relate to the implementation of the SH policy at HQ and in the field. The UNICEF report gives the clearest information saying that at country level, as of 2020, new structures were established to implement SH requirements including action plans, and culture committees to improve the workplace environment. UNDP's mechanisms span the field: the multi-disciplinary SEA/SH task force has representation from country offices and HQ and the reporting mechanism for the executive board includes the 2020 survey of 130 UNDP country offices on their response to SH and SEA.

Regarding the specific requirements iterated in this benchmark, most organisations have a **coordinating body** (UNICEF, OCHA, UNDP, UNOPS) and some mention **channels of support to victims:** UNDP and UNOPS refer to counselling services and a network of peers respectively and OCHA set out responsibilities for supporting victims.

The key issue is the amount of **dedicated financial resources** allocated to this issue. Only one assessment addresses this question directly. The UNOPS assessment says that there is no documentary evidence of any dedicated financial resources available for supporting implementation of the SH policy and action plans and interviews at HQ confirmed that there is no dedicated budget, but that the management budget is being used for this.

Training and awareness-raising

Element 4.8.4

All managers have received training on preventing and responding to SH and all staff have been trained to set behavioural expectations (including with respect to SH).

Key findings: Most agencies (UNICEF; UNEP; OCHA; UNDP) refer to mandatory training for staff and UNDP, UNEP, and UNOPS emphasize managers. The UNICEF, UNEP, and UNDP reports also include data on training completion rates. ILO has yet to roll out a global training programme.

*The assessments refer to SH training and awareness-raising for **all staff** and often refer to mandatory training:*

- ⊙ **UNICEF** assessment specifically mentions updated guidelines to include mandatory training, a clear reporting protocol, and the integration of values into UNICEF's competency framework. It also has an internal communications strategy to raise staff awareness of the importance of addressing SH in the workplace, updates and townhall meetings and dedicated intranet webpages with technical resources and tools.

- ⊙ **UNEP** reports that all personnel must complete mandatory training – Working harmoniously – on the prevention of SH and abuse by United Nations personnel.

- ⊙ **OCHA** staff must be trained on SH prevention. OCHA refers to its intranet with curated policies, guidance, and good practice, communication to share information on reporting mechanisms and support available options, coverage in meetings and retreats and leadership training to promote more consultative and collaborative approaches to reduce SH risks.

- ⊙ **UNDP** says that training on SH is mandatory for all staff. It also carries out awareness-raising activities such as outreach to personnel and regular townhall meetings by the administrator and senior personnel as well as reference materials on the SH/SEA website.

- ⊙ **UNOPS** refers to workshops on SH (and SEA) for management that focus on basic principles, case scenarios, and various initiatives to enable reporting such as the confidential online 'Speak Up!' hotline and an email address for reporting grievances.

- ⊙ **ILO**'s assessment says that there have been office-wide campaigns and it claims that the culture has changed as a result without providing evidence. It also notes that training on preventing and responding to SH is not yet available globally for all staff, although ILO staff can participate in the ILO International Training Centre (ITCILO) course on the subject, which is based on Convention 190. ILO acknowledges these gaps and is developing an online training course.

Regarding **training for managers** as specifically highlighted by this benchmark, three reports refer to this. UNEP reports that in 2019, the UN Secretariat-based entities (UNON, UNEP, UN-Habitat) organised harassment awareness training for managers. UNOPS refers to workshops on SEA and SH to specifically support management. The assessment says it is unclear whether these involved all personnel or managers only and did not give the number of attendees. The strategy emphasises the responsibility of managers to have authentic conversations about SEA and SH, but no further insight was obtained about this or about how managers or others have provided advice or have helped resolve issues.

The UNDP assessment says that training on SH is mandatory for all staff, and focuses especially on managers and their role in responding to SH. One particularly positive practice is including the issue in   annual performance appraisal of managers: the performance of managers, supervisors, and directors is assessed against whether they have helped create a safe and inclusive environment that extends to the prevention of and response to SH (through a specific performance indicator). Directors are required to submit a certificate indicating that they have taken all appropriate actions about their specific responsibilities for preventing and responding to SH.

Some assessment reports provide data on **number of staff trained:**

⊙ **UNDP:** around 2 000 UNDP personnel participated in presentations and training in 2019 and 92% of staff and 85% of service contract holders passed the mandatory course on the prevention of SH, harassment and the abuse of authority. These courses are currently a single, mandatory module.

⊙ **UNEP:** as of 2 June 2021, 89% of UNEP staff had completed the mandatory training, and 3% had yet to complete it, while the balance were not enrolled.

⊙ **UNICEF:** as of 12 February 2020, 94% (14 409) of staff had taken the mandatory online training on PSEA/HA (available in the six official UN languages).

Reporting mechanisms

Element 4.8.5

Multiple mechanisms can be accessed to seek advice, pursue informal resolution, or formally report SH allegations.

Key findings: All agencies have formal and informal mechanisms for seeking support or for reporting SH allegations. However, the range of mechanisms available vary. Some such as UNDP (in particular) and UNICEF, OCHA, and UNOPS having more channels available. The descriptions in the UNEP and ILO assessments are more limited.

All organisations have mechanisms to **report SH allegations informally or formally.** *The range of mechanisms varies and some give more options than others:*

⊙ The **UNDP** assessment notes a range of formal and informal mechanisms:

  ▷ Advice and resolution to SH allegations formally through the UNDP Office of Audit, or informally through the ombudsman's office, the ethics office and through counselling services.

  ▷ The Respectful Workplace Facilitators Programme, through which UNDP personnel trained in conflict management skills offer a confidential resource for anyone experiencing harassment, the abuse of authority, discrimination, or conflict in the workplace. As the pilot programme moves into its second year, 48 respectful workplace facilitators are active in 24 country offices.

  ▷ UNDP personnel experiencing abuse can also access resources or redress through an externally-managed independent helpline (Expolink/Navex Global), which handles all forms of harassment and other workplace misconduct.

  ▷ Team of counsellors in the bureau for management services office of human resources, co-ordinated by a focal point provides support to victims.

  ▷ The UNDP Office of Audit is mandated to investigate sexual misconduct and has set up a designated sexual misconduct team with three trained investigators. The team is led by the focal point from the office of audit of sexual misconduct who is also a permanent member of the UNDP Task Force.

  ▷ To support increased reporting on SH, UNDP has extended protection from retaliation to all SH victims/survivors and whistle-blowers in the workplace through its policy for protection against retaliation.

⊙ The **UNICEF** assessment finds that staff have access to information in easily understood formats on reporting, investigation, behavioural standards, ethics, and human resources.

  ▷ This includes mediators in the Office of the Ombudsman for United Nations Funds and Programmes to help resolve interpersonal conflicts.

  ▷ Organisational culture is being embedded into UNICEF tools and systems (such as the UNICEF Strategic Plan, 2018–21 and office scorecards) and initiatives (management training and the new innovation strategy).

- ▶ The policy on prohibited conduct was updated in March 2020 to state explicitly that reporting can be anonymous and to lift the statute of limitations on complaints. This led to a major increase in reports to the UNICEF Office of Internal Audit.
- ▶ The assessment found less evidence that to address SH, SH victims/survivors have a range of informal and/or anonymous mechanisms from seeking advice, counselling, medical care, managerial intervention, and informal resolution to formal complaint mechanisms.

- ⊙ **OCHA** staff, according to the assessment, can access confidential guidance or advice, through consultation with the UN Secretariat Office of the Ombudsman or the Office of the Staff Counsellor. Within OCHA, OCHA Human Resources provides guidance. The SOPs on sexual misconduct set out voluntary informal resolution processes. OCHA's Office of the Ombudsman and Mediation Service, Staff Counsellor, the Speak-up Hotline, and Human Resources Section can assist and advise staff wishing to pursue informal resolution A written complaint may be submitted by email to the Under-SG/OCHA, with a copy to the UN Office for Internal Oversight Services (OIOS) or to OIOS directly. There is 24-hour helpline for UN personnel to speak confidentially with an impartial and trained individual for information on protection, support, and reporting mechanisms. The helpline can be reached by phone or email.

- ⊙ **UNEP** provides guidance to all UNEP personnel on how to submit SH complaints and access the UN Secretariat 24/7 Helpline. UNEP offers the option of informal resolution or formal complaint to OIOS using the web-based hotline or a written complaint to the UNEP Executive Director for forwarding to the UN Office for Internal Oversight Services. Focal points are designated to give confidential guidance.

- ⊙ The **ILO** has multiple mechanisms in place to report allegations of SH including informal resolution (third party assistance, facilitation, and mediation) and formal resolution (grievance procedures). However, the roles of the different parties, notably in informal resolutions, are not clearly specified in the policy.

- ⊙ The **MOPAN methodology** does not require assessments to record the number of allegations/complaints filed but does ask assessment teams to show whether mechanisms exist. Data on complaints can be adduced to show such that mechanisms are in place and functioning to some degree, although without specifying how well they are working. Two reports provide data on complaints:

- ⊙ **UNDP.** The 2019 Annual UNDP Office of Audit report found that complaints related to sexual misconduct (including both SH and SEA) constituted 8.4% of the cases it received in 2019, a 2.5% decrease compared to the 10.9% in 2018. Of these, 4.3% related to SH (16 cases), of which five cases were substantiated.

- ⊙ **UNICEF.** The assessment cites UNICEF data showing a 120% increase in the number of all new reports to the Office of Internal Audit in 2019 compared to 2018, which shows growing trust in the system.

Timely action in response to allegations

Element 4.8.6

The organisation ensures that it acts in a timely manner on formal complaints of SH allegations.

Key findings: All agencies commit to handling complaints in a timely fashion, but only the UNDP and UNICEF assessments provide data to show how they are doing so. ILO and UNOPS affirm their policy commitments to timeliness, but there is insufficient information to substantiate the claim: their policies are not comprehensive (e.g., ILO has deadlines for some stages and not others; UNOPS does not stipulate any deadlines); and there is no data showing how long complaints take. OCHA and UNEP depend on the UNOIOS to investigate on their behalf and therefore do not control the timeline.

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All organisations commit to timeliness but the degree to which they can show that they are timely varies. UNDP and UNICEF assessments both include data showing the duration of investigations:

⊙ **UNDP** aims to act in a timely manner on formal complaints of SH allegations according to its strategy and action plan. It aims to finalise investigations of SH within six months. Where there is sufficient information, allegations are reported publicly in the i-Report tracker (managed by the UN Secretariat Office of the Special Coordinator on a "near real time" basis, with case information updated regularly by the UNDP Office of Audit). These cases are also reported publicly on an annual basis in the UNDP Annual Report of the Administrator on Disciplinary Measures and other Actions Taken in Response to Fraud, Corruption, and other Wrongdoing. Drawing on data from the UNDP Office of Audit, the SEA/SH task force reports that SH investigations of SH between 1 January 2019 and 16 December 2020 averaged between 5.7 and 6.6 months.

⊙ The **UNICEF** Strategy includes provisions to ensure that investigations and sanctions for "SEA" (sic) allegations are swift and credible, and it revised it internal procedures in 2020 to simplify complaints of SH allegations. The UNICEF Office of Internal Audit is closing cases more quickly. It achieved a 209% increase in the rate of closure in 2019 compared to 2018. Sexual misconduct investigations have, on average, taken 99 days to complete. In 2019, the UNICEF Office of Internal Audit instituted a target of 90 days for all investigations into sexual misconduct. The assessment found that a very robust process exists and that PSEA/SH cases typically go to the front of the investigation line despite limited resources. The assessment noted however, that timeliness benchmarks are unclear and that the work remains challenging and effort-intensive.

The policies of some agencies have time limits but no data to show whether they are respected:

⊙ The **ILO** assessment finds time limits for each step of the formal complaints mechanism in the 2004 policy, updated in the 2014 Collective Agreement. There is evidence that SH incidents are processed rapidly (for example, for participants in ITCILO courses, those involved in SH were expelled within 24 hours). All receivable allegations of SH must be referred for investigation within a maximum of 20 working days from receipt of the complaint. However, an office-wide system is needed to monitor and – if required – improve the implementation speed of the process.

⊙ The **UNOPS** strategy commits to timely responses, but the assessment found no evidence for the timeliness of responses to allegations. UNOPS annual reports include lists of substantiated allegations that, in 2019, comprised one SH case and the action taken. Such allegations feed into interagency human resources mechanisms since UNOPS is involved in Clear Check, where findings are recorded, and is also a member of the UN High-Level Committee on Management and the Chief Executive Boards Human Resources network where these topics are regularly discussed, and joint initiatives are agreed.

Some agencies depend on other UN entities for investigation and therefore do not control the timeline:

⊙ **OCHA**'s SOPs defined a response process for formal SH complaints without including a timeline. When an official complaint is received, the under-SG should refer the matter to the UN OIOS to assess the complaint and determine whether to launch an investigation. If there are sufficient grounds, OIOS will initiate an investigation. The timeline is not under OCHA's control as OIOS is external to OCHA and some investigations can be protracted. Internally, the executive office informs the OCHA Senior Management Team of PSEA and SH allegations and cases monthly. Externally, OCHA's PSEA/SH SOP stipulates that OCHA reports to the SG.

⊙ **UNEP** aims to respond quickly to SH allegations, but relies on OIOS for case resolution. The assessment notes that processing of some cases by OIOS was delayed in 2020 by the COVID-19 pandemic.

Annual reporting of actions taken

Element 4.8.7

The organisation transparently reports the number and nature of actions taken in response to SH in annual reporting and feeds into inter-agency HR mechanisms.

Key findings: Most assessments describe a process for reporting the number of SH cases and actions taken. UNICEF, UNDP, and UNOPS appear to meet this requirement better than the other organisations. These three assessments make it clear that such reporting takes place annually. The level of transparency varies and seems defined differently by different organisations. The three agencies in question explicitly refer to a high level of transparency in public reporting. By contrast, the ILO report says the information is kept internal; the OCHA report does not address this point, and the UNEP report concludes that there is transparent reporting without providing further details. All agencies participate in ClearCheck, an inter-agency human resources mechanism aiming at preventing re-hiring perpetrators.

Most organisations meet this requirement insofar as they describe reporting processes but the degree of **transparency** varies and depends on how it is defined. Several organisations specify the organisational annual reports in which such data appears but only UNDP and UNOPS expressly state that this data is published: UNDP published the OAI report 2019 on its website which includes dismissals for proven SH allegations and the UNOPS report says that this data is published in the executive director's annual report. The UNICEF assessment also finds this benchmark to be fully achieved as the data is contained in annual reports of its Office of Internal Audit and Investigation although it does not say whether this report is available to the public or simply to governing bodies.

The UNEP assessment says the organisation transparently reports but the process is not described and very few cases have been reported so far. The ILO report finds that reporting remains internal and is not transparent. The number and nature of actions taken in response to SH are collated by the human resources department and presented to the chairperson of the governing body but are not available publicly or shared within the UN system. On the other hand, the assessment says that all fraud and misconduct cases where disciplinary measures were taken are reported biennially in an information note to all staff. Furthermore, the assessment has collected some data on SH cases. There was no specific information in the OCHA assessment on how it reports and whether it does so transparently.

It is worth noting that the inter-agency process for annual reporting as part of the UN SG's annual report on special measures to tackle SEA only applies to SEA and not to SH. While this system does not apply there may be other UN mechanisms, for example, the UNDP assessment refers to reporting data through the SG's compendium on disciplinary measures and that organisations are expected to share this information with all personnel.

On providing such reporting **annually,** the UNICEF and UNOPS reports say that the data is provided every year: at UNICEF, this is done through the annual reports of the office of investigation and audit. The UNDP, UNEP, ILO, and OCHA reports provide no further information.

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*In terms of **numbers reported**, MOPAN does not ask for numbers. The availability of case numbers in the report indicates that the system is working although does not necessarily indicate how well it is working. Lower numbers do not necessarily mean better performance tackling SH and may reflect weaker reporting systems that do not capture cases. The assessments do provide the following information:*

- ⊙ **UNICEF:** Of 364 cases investigated in 2019, 36 were for SH. The report provides information on disciplinary action for all cases of misconduct, although specific actions for SH cases alone are not detailed.

- ⊙ **UNDP:** In 2020, the UNDP Office of Audit received 11 reports of sexual misconduct, a notable decrease compared to 32 reports in 2018 and 31 in 2019, likely due to the COVID-19 pandemic.

- ⊙ **UNEP:** Between 1 January 2019 and 30 April 2020, of three cases that were reported, the UN OIOS was conducting a preliminary assessment rather than an investigation into once case. Investigations for the other two cases had been completed and the alleged offender's/staff members' contracts were terminated.

- ⊙ **ILO:** From 2014 to 2017, one case of sexual harassment was reported where an ILO official was given a warning. The 2018-19 information note is yet to be published. According to the ILO, it will contain one formal complaint of SH and an investigation initiated by the DG under the gross misconduct provisions.

- ⊙ **UNOPS:** there is some information from the benchmark about training and awareness-raising on SH indicating that at the time of interview in late November 2020, two SH cases were being discussed and disciplinary action was being taken.

In terms of **feeding into inter-agency mechanisms,** the agencies report participating in UN ClearCheck, a system-wide centralised screening database to ensure that former UN staff members or UN-related personnel against whom allegations of SEA or SH were substantiated, or who resigned during a pending SEA investigation, are not re-employed in the UN system. This was confirmed by OCHA, UNDP, UNICEF, and ILO but probably applies to all assessed agencies. OCHA further commits to providing information about ongoing investigations and/or disciplinary processes concerning a staff member of a non-UN system entity or prospective employer, upon request, provided that the staff member has given written consent to the disclosure of such information by the entity or prospective employer and that a copy of the consent is provided to OCHA. Regarding hiring, UNICEF says that since 2018, it has systematically 1) requested all external candidates to disclose such a history (upon penalty of termination for inaccuracy); 2) checked three references from former employers, including a verbal reference from the last employer, and 3) for senior staff recruits, examined the "workplace left behind".

Annex 2: Bibliography

1. Global Safeguarding Summit, 2018, Commitments made by donors to tackle sexual exploitation and abuse and sexual harassment in the international aid sector available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/902420/donor-commitments2.pdf

2. Inter-Agency Standing Committee, Six Core Principles, 2019 available at: https://psea.interagency-standingcommittee.org/resources/iasc-six-core-principles-relating-sexual-exploitation-and-abuse

3. Inter-Agency Standing Committee, External Review of PSEA/SH, 2021 available at: https://psea.interagencystandingcommittee.org/resources/iasc-six-core-principles-relating-sexual-exploitation-and-abuse

4. MOPAN How to assess the performance of Multilateral Organisations in safeguarding against sexual exploitation, abuse and harassment? Case Study available at: https://www.mopanonline.org/ourwork/newdevelopments/Draft_Deliverables_forERG_20190717.pdf

5. MOPAN (2020) SEAH Note for practitioners: Measuring multilateral performance available at: https://www.mopanonline.org/analysis/items/seahnoteforpractitionersmeasuringmultilateralperformance.htm

6. MOPAN_3.1_Methodology available at: https://www.mopanonline.org/ourwork/themopanapproach/Methodology_3.1_FinalUnformatted.pdf

7. OECD DAC Recommendation on Ending Sexual Exploitation, Abuse, and Harassment in Development Co-operation and Humanitarian Assistance available at: https://www.oecd.org/dac/gender-development/dac-recommendation-on-ending-sexual-exploitation-abuse-and-harassment.htm

8. UK Parliament, Sexual violence and exploitation: the experience of refugee children in Liberia, Guinea and Sierra Leone – report of assessment mission carried out for UNHCR and Save the Children – UK, 2002 available at: https://www.parliament.uk/globalassets/documents/commons-committees/international-development/2002-Report-of-sexual-exploitation-and-abuse-Save-the-Children.pdf

9. UNICEF, Partnership cooperation agreement, available at: https://www.corecommitments.unicef.org/ccc-3-5

10. UN, United Nations Protocol on Allegations of Sexual Exploitation and Abuse Involving Implementing Partners, available at: http://www.un.org/en/pdfs/UN%20Protocol%20on%20SEA%20Allegations%20involving%20Implementing%20Partners%20-%20English_Final.pdf

11. WHO, Final Harmonized Language SEAH, July 2021 available at: https://cdn.who.int/media/docs/default-source/documents/harmonized-seah-clause-july-2021-english-.pdf?sfvrsn=d4d44a31_9

ILO

12. ILO 2020 MOPAN Assessment available at: https://www.mopanonline.org/assessments/ilo2020/MOPAN%20Assessment%20ILO%20[for%20download].pdf

13. ILO 2020 Assessment Brief available at: https://www.mopanonline.org/assessments/ilo2020/ILO%20Assessment%20Brief.pdf

14. ILO 2020 Management Response available at: https://www.mopanonline.org/assessments/ilo2020/ILO%20Mgmt%20Response%20and%20Letters%20to%20DK%20and%20SWE%20-%2024Nov21.pdf

MOPAN

OCHA

15. OCHA 2020 MOPAN Assessment available at: https://www.mopanonline.org/assessments/ocha2020/MOPAN%20Assessment%20OCHA%20web%20[for%20download].pdf

16. OCHA 2020 Assessment Brief available at: https://www.mopanonline.org/assessments/ocha2020/MOPAN%20Brief%20OCHA%20web.pdf

17. OCHA 2020 Management Response available at: https://www.mopanonline.org/assessments/ocha2020/MOPAN_OCHA_Management%20Response.pdf

UNDP

18. UNDP 2020 MOPAN Assessment available at: https://www.mopanonline.org/assessments/undp2020/MOPAN%20Assessment%20UNDP%20report%20web%20[for%20download].pdf

19. UNDP 2020 Assessment Brief available at: https://www.mopanonline.org/assessments/undp2020/MOPAN%202020%20Assessment%20Brief%20UNDP.pdf

20. UNDP 2020 Management Response available at: https://www.mopanonline.org/assessments/undp2020/UNDP%202020%20Management%20Response.pdf

UNEP

21. UNEP 2020 MOPAN Assessment available at: https://www.mopanonline.org/assessments/unep2020/MOPAN%20Assessment%20UNEP%20web%20[for%20download].pdf

22. UNEP 2020 Assessment Brief available at: https://www.mopanonline.org/assessments/unep2020/UNEP%20Assessment%20Brief%20[web].pdf

23. UNEP 2020 Management Response available at: https://www.mopanonline.org/assessments/unep2020/UNEP%20Management%20response%20to%20MOPAN%20Report.pdf

UNICEF

24. MOPAN 2020 Assessment UNICEF available at: https://www.mopanonline.org/assessments/unicef2020/MOPAN%20Assessment%20UNICEF%20web%20[for%20download].pdf

25. UNICEF 2020 Assessment Brief available at: https://www.mopanonline.org/assessments/unicef2020/UNICEF%20Assessment%20Brief%20[web].pdf

26. UNICEF 2020 Management Response available at: https://www.mopanonline.org/assessments/unicef2020/MOPAN%20Management%20Response%202020%20Assessment%20of%20UNICEF.pdf

UNOPS

27. MOPAN 2020 UNOPS report available at: https://www.mopanonline.org/assessments/unops2020/MOPAN%202020%20UNOPS%20report%20[web-1].pdf

28. UNOPS 2020 Brief available at: https://www.mopanonline.org/assessments/unops2020/UNOPS%20Brief%20[web].pdf

29. UNOPS 2020 Management Response available at: https://www.mopanonline.org/assessments/unops2020/MOPAN_2020_UNOPS_Management%20Response.pdf

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