



External Evaluation of IOM's Approach to Protection Against Sexual Exploitation and Abuse and Sexual Harassment

FINAL REPORT

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List of Acronyms

AAP	Accountability to Affected Populations
CO	Country Office
CBCM	Community-based Complaints Mechanism
CEB	United Nations Chief Executive Board
CFM	Complaints and Feedback Mechanism
CoM	Chief of Mission
CXB	Cox's Bazar
DG	Director General
DDG	Deputy Director General
DOE	Department of Operations and Emergencies
DHR	Department of Human Resource Management
ECO	Ethics and Conduct Office
GBV	Gender-based Violence
GHAP	Global Health Assessment Programme
GBViC IFW	Gender-based Violence in Crisis Institutional Framework
GSAC	Global Staff Association
HC	Resident Coordinator
HQ	Headquarters
IASC	Inter-Agency Standing Committee
IDP	Internally Displaced Populations
IN	Instruction
IGF	Internal Governance Framework
ILO	International Labour Organization
IOM	International Organization for Migration – UN Migration
IP	Implementing Partner
IQ	Institutional Questionnaire
IRF	Incident Reporting Form
LEG	Department of Legal Affairs
L3	Level 3 Emergency
MIRAC	Migration Resource Allocation Committee
MOPAN	Multilateral Organizational Performance Assessment Network
MOU	Memorandum of Understanding
OECD/DAC	Organization for Economic Co-operation and Development's Development Assistance Committee
OIG	Office of the Inspector General
PSEAH	Protection from Sexual Exploitation and Abuse
RC	Resident Coordinator
RO	Regional Office
REV	Revision
RWE	Respectful Work Environment
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SOGIESC	Sexual orientation, gender identity, gender expression and sex characteristics.
SOPs	Standard Operating Procedures
SRF	Strategic Result Framework
TORs	Terms of Reference
TPC	Third-Party Contractor
UN	United Nations
UNV	United Nations Volunteers
UNFPA	United Nations Population Fund
USRAP	United States Refugee Admissions Programme
VA	Victim Assistance
VCA	Victim-centered Approach
WAAI	We Are All In
WB	World Bank
WFP	United Nations World Food Program

Executive Summary

BACKGROUND & SCOPE

The objective of the evaluation is to assess the relevance, performance and impact of IOM's approach to PSEAH¹, as well as coherence and sustainability in its implementation as per MOPAN and OECD/DAC evaluation criteria.

The findings and recommendations of the evaluation are meant to be used to strengthen IOM's risk management approach to PSEAH, inform the ongoing revisions of IOM's current PSEA policy and contribute to IOM's PSEAH culture and responsibilities as a learning organization.

METHODOLOGY OVERVIEW

The External Evaluation relied primarily on a qualitative approach. Individual and group interviews, using tailored, semi-structured questionnaires, were conducted with a total of 90 key informants across 12 stakeholder groups, including individuals internal and external to IOM². The External Evaluation also drew on desk review of approximately 100 document sources and, in order to ensure inclusivity and representation of different contexts, also relied on data extracted from existing UN system-wide and IOM surveys.

ANALYSIS & FINDINGS

RELEVANCE

PSEAH approach

Recently, there has been a positive evolution in the way the organization approaches PSEAH with the focus moving from a liability, reputational-centered perspective towards a more robust, structured approach that promotes clearer accountability.

Important steps that stem from this evolution have been the appointment of a Senior Coordinator on

PSEAH in 2020 and the establishment of a dedicated PSEAH Unit at HQ-level in 2022, the development of "IOM's Strategic Approach Toward the Prevention of and Response to Sexual Exploitation and Abuse (SEA) and Sexual Harassment", underpinned by five core pillars, the roll out of the PSEAH Toolkit and Checklist in September 2022, among other developments. At the highest level, there is strong leadership commitment for PSEAH within the IOM Executive Office, which is evidenced by deliberate advocacy efforts by the DG and both DDGs to institutionalize PSEAH widely within the Organization, including investments to increase the number of PSEA-dedicated human resources, which will reach 52.5 staff across 40+ countries by the end of 2022.

On the one hand, IOM's PSEAH approach offers advantages: it is malleable, the Organization's projectized funding structure can be pivoted to PSEA when there is commitment to integrate PSEA into programmes and projects, and IOM's emphasis in direct implementation modalities allows the Organization to test PSEA solutions locally that are fit to meet the unique risks of each setting.

On the other hand, the size and composition of PSEAH teams in HQ, and PSEAH resources at regional and country levels supporting delivery of the approach are clearly not adequate to cope with the needs of an organization of over 21,000 staff and related personnel and 7,500 third party contracted staff, with such diverse areas of programming and a massive geographic footprint.

Moreover, the development and consistent implementation of a risk-informed approach would help ensure greater alignment between IOM's PSEAH approach and its operational delivery, by improving predictability and prepositioning of

¹ For purposes of this evaluation, "PSEA approach" is understood as IOM's key PSEAH Policies, strategic framework and operational delivery, including staffing structure, organizational organigram/positioning of core IOM PSEAH-relevant units/departments, as well as structure and functioning of IOM's internal justice system.

² It has not been possible to speak directly with communities or victims, given the scope of the evaluation methodology and the sensitivities associated with the topic at hand – including the need to abide by highest standards of safety and confidentiality. Victim's perspectives were captured through secondary accounts, notably, IOM staff engaged in community-level work at field-level and staff interacting directly with SEA and sexual harassment victims.

PSEAH capacities and resources within missions and programmes³.

Overall PSEAH accountabilities across the IOM workforce – broadly understood as comprising all workers supporting IOM operations, be it IOM staff, consultants and interns, as well as implementing partners (IP), third parted contractors (TPC) staff, and service providers – is uneven. Different types of workers are covered by different prevention requirements, investigation processes and afforded different protection and guarantees depending on their contractual status. There are also limitations associated with the inconsistent implementation of PSEA capacity assessments, which are mandatory within other UN entities but not yet made mandatory within IOM.

PSEAH Policies

Recognizing the need for the Organization to address some gaps in its approach to PSEAH, whilst considering progresses and changes that have taken place in IOM in the past six years (2016-2022) as well as recent developments within the UN and the IASC on PSEAH, IOM has undertaken several policy revision processes over the past years.

The current ongoing revision of IN/234 (IOM PSEA Policy, 2016) provides opportunities for the Organization to strengthen its PSEA approach by addressing well-known gaps through a consultative and collaborative process. The Organization is leveraging this revision to reach consensus around specific contentious issues to enhance internal and external coherence.

In addition to ongoing work, the External Evaluation identified additional considerations that, if reflected in the IN/234 PSEA policy revision process, would contribute to further strengthening IOM's PSEA approach, such as, the introduction of IOM vision, guiding principles and operationalization of a victim-centered approach, adoption of a broader statement prohibiting sexual relationships with beneficiaries, among others.

Opportunities for enhancing IN/90 Rev.1, which was recently finalized and launched in October 2022 were

³ *Building on the IOM PSEAH Toolkit and Checklist, the SEA Risk Analysis Framework that will be submitted as a second deliverable of this External Evaluation will support IOM in consistently moving*

also identified -- notably: highlight the differential nature of sexual harassment vis-à-vis other types of abusive or inappropriate behaviour in the workplace; introduce IOM's vision, guiding principles and operationalization of IOM's victim-centered approach to prevention and response to sexual harassment, among others.

Beneficiaries' needs and priorities

Analysis of secondary documentation and indirect accounts shared by key informants have led to the identification of a set of shortfalls related to SEAH complaints handling process, from the point of reporting to investigation and victim assistance, up to case closure. Strengthened efforts are needed to ensure the PSEAH approach is able to more fully reflect and meet the needs and priorities of beneficiaries and affected individuals, in particular, SEAH victims and populations on the move. Such efforts should concentrate in ensuring a victim-centered approach is institutionally prioritized. This includes ensuring that reporting channels are fit for communities to report SEA and safely link with WAAI, that complaints handling processes are guided by survivor-centered considerations, that current approaches are expanded to consider the needs of children and people with diverse SOGIESC, etc.

INTERNAL COHERENCE

The development of IOM's PSEAH Strategy (2021), the IOM PSEAH Toolkit and Checklist (2022), the revitalization of the IOM HQ PSEAH Task Force (2021), among other important developments have set the foundation for a more coherent approach to PSEAH.

Building on these efforts, the integration of PSEAH within the objectives and components of the Internal Governance Framework (IGF) should be strengthened, insofar it would help to reinforce a victim-centered approach to IOM's internal justice systems.

Current levels of coordination between the various PSEAH-relevant departments at HQ-level is insufficient to ensure the coherent delivery of the

forward with the implementation of risk-informed approach to PSEA within programmes and operations.

PSEAH approach. A large number of field-level informants manifested the perception that they are not speaking with the same voice on PSEAH issues.

While noting undeniable, remarkable progress towards a more robust and comprehensive PSEAH framework that will set the foundations to strengthening IOM's PSEAH approach globally; until recently, there appears to have been more institutional efforts committed to strengthening IOM's reporting and investigations functions than to developing and operationalizing a comprehensive victim-centered approach for the Organization.

At the operational level, the External Evaluation identified culture imbalances between IOM programmes and operations in humanitarian and development settings. These include differences in investment in GBV/Protection/PSEA-dedicated expertise, dissemination of guidance and tools to support PSEA mainstreaming across sectors, and synergies with the Protection and GBV/Child Protection sectors. Uneven practices and differences in investments and availability of specialized human, technical and financial resources also lead to inconsistent PSEAH approaches at regional and country levels within IOM. For example, the SEAH reporting and complaints handling process, including referral of victims for assistance, is structured differently in each mission, leading to varying results in terms of quality and effectiveness.

Further coherence is needed on aspects related to IOM's engagement with service providers, IPs and TPCs. But there is a strong indication that their implementation is not systematically or sufficiently monitored by IOM at the operational level. The uncertainty around TPC's and IP's capacity to deliver victim-centered investigations and safely refer victims to services is another gap that affects the implementation of a coherent and comprehensive approach to PSEAH.

EXTERNAL COHERENCE

IOM is widely recognized for its commitment to system strengthening on PSEAH; it understands that results can be best achieved and maximized if the whole system performs in an optimal manner. There is, however, a visible disconnect between the prominent role played by IOM in driving system wide PSEA efforts forward and under-investment in its

own internal PSEAH resources, systems and structures, which, until recently, were not on par with the international standards IOM so keenly promoted.

Efforts to progressively align with UN standards have been slow due to a lack of dedicated PSEAH capacity at HQ-level, but recently accelerated with establishment of the IOM PSEAH Unit in 2021, insofar there is now a small, dedicated team at the highest level of the Organization tasked with moving institutional PSEAH efforts forward. The revision of systems and practices has been slower and should entail a proper exploration of advantages and disadvantages of subscribing to international policies and standards that differ from systems and procedures currently in place within IOM, especially by considering specific areas in which IOM's policies are affording more protection to beneficiaries and victims than those promoted by UN/international standards.

Momentum is ripe for IOM; a Management Reform is underway and key policy documents are being updated. Hence, milestones and timelines be set for resolving IOM's position on the adoption of UN/international norms standards, and moving forward with any associated institutional reforms, at the risk of compromising legitimacy, accountability and effectiveness if these are not expedited.

IOM's strong technical capacity in GBV and successful track-record experience embedding GBV risk mitigation approaches into the work of wider sectors provide the Organization with a wealth of institutional knowledge that can be easily transferred to the PSEA field to align IOM with current PSEA best practices, particularly on victim assistance and in ensuring a victim-centered approach.

EFFECTIVENESS

There has been critical progress and important milestones achieved within IOM's wider PSEAH efforts in the recent years, as demonstrated by, for example the establishment of the IOM PSEAH Senior Coordinator role, and the set-up of a dedicated PSEAH, coverage and level of awareness reached by mandatory training on PSEA to all IOM staff and related personnel, the revitalization of the PSEAH Task Force in HQ, Establishment of a formal, duly appointed, network of PSEA Focal Point across all

IOM offices coupled with the roll out of standard, TORs for PSEA Focal Points and Officers as of late 2021, ensuring a more coherent use of PSEA human resources at country and regional levels, among many others.

The five areas below were identified as those most in need of strengthening to enhance overall effectiveness of IOM's PSEAH approach.

Sexual Harassment

Firstly, staff generally confuse the terminology "sexual harassment" and "sexual exploitation and abuse (including which carry mandatory reporting obligations). In addition, critical mission-level stakeholders are not clear on what their role should be when confronted with sexual harassment disclosures. The default message has been to refer the victim to the WAAI platform, without fully realizing that this will trigger an official complaint handling process. Available options for addressing sexual harassment, and implications of choosing one avenue or another, are either largely unknown or unclear to staff at all levels of the organization.

Lastly, formalized protocols that spell out how the victim will be protected while the investigation is underway and the alleged abuser remains in the workplace are lacking and urgently needed.

Reporting

Since the launch of the WAAI platform, the goal of streamlining reporting channels to address confusion among staff has been largely achieved. There is a good level of awareness among IOM staff of IOM channels for reporting sexual misconduct.

However, as with similar misconduct reporting platforms used by peer organizations, WAAI works well as a staff reporting mechanism, especially for sexual harassment, but is largely unsuitable for communities or the affected populations to use due several barriers.

The External Evaluation identified a number of gaps associated with the current reporting platform and form. When SEA allegations are disclosed through the local CFM or other alternative entry points, practical guidance on how to safely and ethically transfer SEA information from CFMs to WAAI, that is adapted to the needs and capacities of different IOM missions, is missing.

Moreover, evidence suggests that the current design of the form does not facilitate the collection of all data points necessary to expedite the investigation process nor the referral of victims to assistance (when this has not been done so by the staff when receiving the complaint). While in some missions the report is completed by a staff member trained on SEA complaints handling, including on victim assistance, this is not always the case due to lack of technical expertise or institutional directive. Furthermore, the External Evaluation also identified the pervasive belief among many IOM staff that sharing information about a case with anyone other than OIG, including the PSEA Focal Point/Officer, would be a breach of confidentiality and could provide grounds for misconduct charges.

Internal Justice

OIG has increased its capacity to move forward with investigations into cases of sexual misconduct in a more agile manner; backlog overload at intake stage has been reduced and time taken to deliver investigation reports to LEG for follow-up decisions on disciplinary measures has decreased.

Internal key informants from various departments, and at all levels of the Organization, have unanimously expressed difficulties engaging with OIG and understanding its internal processes and systems, for example, estimate timelines for milestones to be reached in the investigation process, how OIG's processes work in areas of common interest where their efforts intersect with OIG's, such as victim protection and referral to assistance services, etc.

The lack of standardized, clearly articulated investigations SOPs for cases of sexual misconduct, that OIG could rely on to explain to others about its systems and processes are compounding these challenges and eroding trust in the system.

The Organization should also re-examine whether it is possible to change subscription to another tribunal, other than ILO's Administrative Tribunal, in an attempt to lower the thresholds of burden of proof and ensure these are appropriate given the specific nature of sexual misconduct. This would certainly contribute to making IOM's internal justice system more victim-centered, likely countering the

perception that the burden of proof works as an enabler of impunity.

Victim-centered approach

The lack of a victim-centered approach framework is probably the most critical institutional gap presently facing IOM. Its implications are far reaching, detracting from overall system effectiveness.

Institutionally, there is no common understanding of what a victim-centered comprehensive approach means and entails for IOM, including on the rationale of adopting a victim-centered approach, on how the organization is operationalizing survivor-centered and trauma-centered guiding principles to PSEAH, and, more critically, no clarity mechanisms, as well as roles and responsibilities when it comes to ensuring protection and safety of SEAH victims and that appropriate, safe, timely and accessible quality assistance services are available to SEAH victims.

Hurdles inherent to the structure of IOM's current complaints handling process hamper effective implementation of a victim-centered approach. While it is expected that the recently established PSEAH Unit will take the lead on the victim-centered approach, there is, formally, no clearly assigned institutional-level accountability for the victim-centered approach, including victim assistance. This creates challenges for missions in structuring their victim assistance referral processes in a way that is consistent with IOM's institutional approach and best practice. Perhaps the most notable example of this void is the requirement of notifying the PSEA Focal Point when a SEA case is received to ensure victims can be safely referred to services, which is left at the discretion of each mission.

Overall, capacity to support and refer SEA victims is uneven across regions and missions. Another critical gap is the prevailing perception that there is no consistent, standardized approach to information sharing with SEAH victims during investigations and upon case closure, which damages trust in the process.

For sexual harassment, there is no minimum standard for the provision of victim assistance services, including remedies and restorative care during and following the completion of a complaints handling process; different categories of personnel

are afforded different guarantees, for example, access to health coverage, legal counseling, etc. Ultimately, the absence of guidance, information and consistent support acts as a deterrent to reporting.

Workforce

As noted previously, there is a need to tighten, and more systematically apply and monitor, TPCs' PSEAH requirements, especially given that missions with a higher proportion of third-party contracted staff are those at higher risk of SEA and sexual harassment. At present, there are no requirements for any IOM partners or service providers on sexual harassment.

The most significant gap identified is the need to expand staffing or enhance technical capacity of TPC, IP and service providers' own investigations teams to ensure their processes are on par with IOM's standards, including the victim-centered approach. This is critical to guarantee that the same levels of accountability can be maintained across all IOM workforce categories.

EFFICIENCY

HQ-level staffing

Despite significant accomplishments to strengthen PSEAH efforts globally in such a short period of time, the current staffing levels are clearly not sufficient to meet the demands of such a large, far-stretching, diverse and operational organization as IOM. The team's cadre of technical expertise and political clout would be greatly enhanced with the establishment of a senior-level Survivor Care Officer (SCO) within IOM's PSEAH Unit who will be responsible for putting SEAH victims' rights and dignity first.

The OIG team of investigators is gender balanced; staff has diverse background and training in SEAH-relevant areas, but size, gender, language composition and areas of expertise are insufficient to meet the specific demands of investigations of cases involving sexual misconduct.

Overall, the External Evaluation identified that LEG, Staff Welfare, DHRM and Office of the Ombudsperson are either in need of recruiting more personnel, or of solidifying contractual arrangements for existing staff to guarantee sustainability of

positions, or of ensuring greater physical decentralization of positions to better meet the demands of PSEAH work internally within IOM.

Field-level PSEAH resourcing & expertise

The nomination of PSEA Focal Points within all IOM's ROs and COs is a critical step in the process of strengthening IOM's PSEAH approach. By the end of 2022, IOM will have 55.5 PSEA field staff in place, across 39 countries (excluding HQ), 20 PSEA RO Focal Points covering all nine IOM regions, and at least one CO PSEA Focal Point in each of the IOM country offices.

Another positive development has been the development and launch of standard TORs for dedicated PSEA positions, issued in late 2021 by the PSEAH Unit in coordination with DHRM, to formalize responsibilities of PSEA Officers at a range of grade levels, as well as standard TORs for CO and RO PSEA Focal Points. This is also part of wider efforts to encourage more deliberate, conscientious appointments by CoMs to ensure that staff appointed to serve as PSEA Focal Points are fit for the requirements of the role and that management allows them the necessary time and resources to complete their tasks.

A discussion between the PSEAH Unit and the Office of the Ombudsperson is necessary to address potential gaps on roles and responsibilities on issues related to sexual harassment, as these are not covered by the PSEA Focal Point/Officer TORs and should also synergize with the role of Respectful Work Environment Focal Point.

IMPACT

Globally, the absence of a theory of change and a corresponding results framework underpinning IOM's PSEAH approach has hindered an in-depth analysis of "Impact".

As a result of efforts on staff awareness, including mandatory PSEA training, senior management consistent messaging on PSEAH, IOM has made significant strides in creating an environment where staff acknowledges and understands the Organization's stance on the "Zero Tolerance" policy on SEAH. In addition, there is the feeling that the establishment of the WAAI platform, offering an anonymous and confidential avenue for reporting,

coupled on awareness on IOM's reporting channels has contributed to an increase in the number of reports of cases of sexual misconduct. However, considering potential higher reputational risks and significant steps achieved in its fight against ending impunity for SEA, sexual harassment efforts are overshadowed by strong prioritization of SEA within the Organization.

Globally, IOM's approach to SEAH has historically been driven by a strong focus on reporting and complaints handling, which has worked to the detriment of a victim-centered approach and eroded trust in the system. Recently, efforts have been invested in rebalancing the focus to infuse a more victim-centered approach into prevention, capacity strengthening and awareness raising efforts. While important steps have been achieved in creating awareness among staff on acceptable behaviour and code of conduct, impact on shifting Organizational culture, behaviour and attitudes to create an environment that protects from SEAH has not been yet achieved. IOM must continue investing in identifying, exploring and piloting approaches that recognize the universal and systemic nature of SEAH.

Furthermore, efforts and results to prevent SEAH and protect individuals from SEAH across IOM operations are not timely and sufficiently monitored or disseminated, particularly within the Organization. The Organization should also do better at communicating disciplinary actions taken against offenders more widely and through powerful messaging deliberately packaged to change behaviour, counter widespread perceptions of impunity and foster trust in the system.

By establishing a better foundation for its PSEAH approach that includes, for example, a theory of change, and more effective use of monitoring, evaluation (M&E) and learning functions, as well as collective, institution-wide indicators, and a feedback loop system that enables the Organization to learn from specific cases, IOM can foster continuous learning and improvement, and strengthen accountability on PSEAH.

SUSTAINABILITY

The development of IOM'S PSEAH Strategy (2021), IOM PSEAH Toolkit and Checklist, institutionalization of the PSEA Focal Point system

and network, and efforts to embed PSEAH in institutional policies, frameworks, processes, as well as projects and programmes budgets to fund for dedicated PSEAH human resources, represent major achievements in ensuring greater institutionalization of PSEAH within IOM within the last year.

Visibly, IOM's efforts to promote PSEAH institutionalization have become more structured and deliberate in an attempt to ensure PSEAH considerations consistently reach all areas of the Organization. Recently, targeted and concerted efforts by the DG and both DDGs to ensure PSEA is integrated into project proposals and budgets hold promises for further scaling up the approach across IOM wider programmes and operations, enhancing PSEAH institutionalization within the Organization to bring all programmes and operations to minimum standards.

A few gaps remain that, if bridged, will expedite and deepen PSEAH institutionalization. The first is the need to ensure a more consistent, structured method of engagement between the PSEAH Unit and programmes for the transmission of guidance and best practices to ensure PSEA is duly considered in project proposals, budgets, implementation, etc. Moreover, IOM programmes and operations should more systematically utilize risk assessments to inform the development of their PSEA strategies. Integration of PSEA in IOM's Project Handbook, PRIMA and the establishment of minimum standards for L3 emergencies are also needed. Service providers, IPs and TPCs need to be systematically assessed and supported by IOM to strengthen their PSEA capacities to meet basic standards and accountabilities

Additionally, audience-tailored training for all key staff supporting PSEAH efforts within missions is required to clarify roles, responsibilities and accountabilities. Induction training packages for PSEA Focal Points, dedicated PSEA Officers and other staff that play a key role in moving PSEAH efforts forward at mission-level, notably, the CoMs, is vital.

There is also an opportunity to further empower PSEA Focal Points at RO level, which would provide a cost-effective model for building mission capacity through a trickle-down approach, through the

establishment of dedicated RO PSEA positions tasked with driving PSEA efforts forward in their respective region.

Funding

At the global level, two out of three core PSEAH Unit staff are core funded, which highlights the increased institutional recognition of the criticality of PSEAH and its centrality for the Organization. Given the absence of a dedicated, core budget to implement PSEAH activities, the PSEAH Unit has been consistently leveraging diverse funding sources to support PSEAH functions. Un-earmarked funding from the IGF is currently used to support the WAAI platform, currently housed with IOM's GDC, and in the past, to support the development and delivery of PSEA training and awareness raising materials. Due to the highly flexible nature of IGF funding, it would be important to continue to use this resource to fund other types of PSEAH activities. Additionally, the Unit is also tapping into project-funded, unearmarked, pooled resources from the Migration Resource Allocation Committee (MiRAC) among others.

Yet, predictable, adequate funding, guaranteed year to year to support PSEAH efforts globally is vital as these efforts require a long horizon.

Currently, field-level PSEA resources are mostly project-funded and PSEA Focal Points are often double-hatting, juggling between PSEA and their regular job responsibilities. Efforts to scale up PSEA mainstreaming in wider responses and projects, for example the Ukraine response, are also underway. While this certainly represents a step in the right direction, this approach brings its own challenges as embedding PSEA into country-level project budgets means, in practice, that each mission has full control over its own PSEA funds. This creates challenges for mobilizing resources to support core PSEA coordination functions and activities that cut across a regional response or several countries.

In addition, under the Budget Reform process, IOM is also exploring options for moving CoMs and mission-level resource mobilization positions to core funding, which leaves room for missions to add in costs for other personnel and activities, such as PSEA, without significantly increasing overall project budgets. This is an important institutional incentive that will likely

encourage more PSEA integration into projects and programmes' proposals and budgets.

CONCLUSIONS & RECOMMENDATIONS

A key conclusion emerging from the evaluation is that significant institutional progress has been made on PSEAH, at the institutional, policy, programming and operational levels. Starting with the setting of a dedicated, technically qualified, accountable PSEAH unit within HQ, the past two years have seen a considerable evolution in IOM's approach to PSEAH, which has matured into a more structured and coherent framework. Building on important milestones of previous years, such as the development of training packages that were taken on as model resources by wider UN entities and creation of the WAAI platform, successes were achieved in several fronts, notably:

- The establishment of the IOM PSEAH Senior Coordinator role, and the set-up of a dedicated PSEAH unit (2 out of 3 staff core-funded in 2022).
- Mandatory training on PSEA to all IOM staff and related personnel has a good degree of coverage and has effectively raised staff awareness on IOM's reporting channels.
- The success of IOM's PSEA training resulted in the development of an inter-agency PSEA training.
- Development and launching of the "Best Practices in the Prevention of Sexual Exploitation and Abuse (SEA) in Resettlement and Movement Operations".
- The IOM HQ PSEAH Task Force was revitalized, and Terms of Reference updated to reflect the changing landscape of PSEAH.
- The launch of the IOM PSEAH Toolkit and Checklist in September 2022, this critical resource that provides an operational model for implementing IOM's approach to PSEAH, outlining practical actions that IOM's offices and programmes should take to deliver on PSEAH accountabilities.
- Integration of PSEAH modules within the IOM Chief of Mission training and the IOM Emergency Response and Induction Training (ERIT) for staff preparing for deployment to emergency and humanitarian contexts.
- Establishment of a formal, duly appointed, network of PSEA Focal Point across all IOM

offices coupled with the roll out of standard, formalized Terms of References (TORs) for PSEA Focal Points and Officers as of late 2021, ensuring a more coherent use of PSEA human resources at country and regional levels.

- Efforts to strategically hire dedicated-PSEA staff across high-risk programmes and operational contexts, with several pilots currently underway with funding from various donors.
- Rollout of the UN ClearCheck throughout IOM.
- Inclusion of PSEA in the onset of the Ukraine response.
- IOM co-leads the UN Chief Executive Board Task Force on Sexual Harassment, Workstream on Prevention and Behavioural Science, with the UN Secretariat.
- Through a dedicated inter-agency PSEA project, IOM continues to support collective PSEA actions at the country level, including strengthening inter-agency PSEA Networks and UN Country Team/Humanitarian Country Team PSEA approaches, etc.

Moving forward, the evaluation has identified the following key areas in need of further prioritization and strengthening to maximize relevance, coherence, efficiency, effectiveness and impact, and guarantee sustainability of PSEAH efforts:

1. More deliberate consideration of beneficiary and SEAH victims' needs and priorities into the revision of PSEAH-relevant policies, standards, SOPs revision and institutional guidance.
2. Assigning institutional accountability for the victim-centered approach, including by establishing of a senior-level Survivor Care Office position within the PSEAH Unit.
3. Development and implementation of a victim-centered approach and corresponding operational guidance for missions.
4. Development and implementation of a risk-informed approach and more systematic project- and ground- level SEA risk assessments to inform PSEA strategies, both in terms of resource allocation decisions and concrete risk mitigation actions to be taken across IOM operations, programmes and projects.
5. Upgrades to be made to the WAAI platform to ensure better quality data, more agile

investigations and effective referral follow-ups to victim assistance services and links between WAAI and CFMs to be further unpacked.

6. Enhancement in investigations' human, technical and language capacities to ensure the function is better equipped to meet the requirements of victim-centered investigations, including geographic decentralization for more agile deployment.
7. More strategic and systematic PSEAH communications to foster behaviour change and foster trust in the system.
8. More consistent implementation of IP capacity PSEA capacity assessments and efforts to build IP and TPC PSEAH capacity (especially in complaints handling and investigations); as

well as more systematic monitoring of IP and TPC compliance with IOM's PSEAH provisions.

9. Establishment of PSEAH dedicated Regional Officer/Roving staff to support emergency/humanitarian responses and better integrate PSEA within programming at the onset.
10. Development of audience-tailored training and induction packages, available in different languages targeting different audience groups, such as CoM, Managers, dedicated PSEA Officers and Focal Points, etc.
11. Development of robust M&E framework, including indicators to periodically assess the system's collective performance and the impact of IOM's PSEAH strategic approach.

Findings, analyses and recommendations presented in this report are based on data collected through review of secondary sources, direct interviews conducted with key informants between July August 2022 and on the consultants' own research and professional experience. The consultants would like to express their gratitude to key informants for their invaluable contributions to the analysis and to the PSEAH unit in HQ for the outstanding support provided throughout the External Evaluation.

I. Background & Scope

The objective of the evaluation is to assess the relevance, performance and impact of IOM's approach to PSEAH, as well as coherence and sustainability in its implementation as per OECD/DAC evaluation criteria. It is forward-thinking, identifies innovative practices and identify sexual exploitation and abuse and sexual harassment (SEAH) risks, highlights mitigation measures to put in place, assess IOM's capacity to respond to incidents and focus on sustainability given IOM's unique structure and approach toward projectization. Under the analysis of coherence, the evaluation assesses whether IOM is meeting its external commitments on protection from sexual exploitation and abuse and sexual harassment (PSEAH), including vis à vis the United Nations (UN) and the Inter-Agency Standing Committee (IASC).

The findings and recommendations of the evaluation are meant to be used to strengthen IOM's risk management approach to PSEAH, inform the on-going revisions of IOM's current PSEA policy and contribute to IOM's PSEAH culture and responsibilities as a learning organization. Linkages to and strengthening other IOM policies and instructions are also considered, in line with IASC and UN principles on PSEAH.

More specifically, the evaluation seeks to:

- ***Review PSEAH progress and best practices, gaps and opportunities to strengthen IOM's global approach toward PSEAH*** and promote evidence-based learning and cultural change throughout the Organization. This includes understanding the different programming and operating environments within IOM (i.e.: humanitarian, developmental, high-risk programming, large operational contexts with beneficiary/community interactions).
- ***Identify key recommendations and further steps to strengthen the Organization's PSEAH approach with an emphasis on IOM's PSEAH strategy:*** a) Leadership and Organizational Culture; b) Institutional Accountability and Transparency; c) Capacity-Development, Training and Communication; d) Quality and Accessible Victim Assistance; and e) Partnership and Coordination. Actionable recommendations should be linked to different operating contexts (e.g.: humanitarian/emergency and development), consider specificities linked to programming, and concretely address how the Organization can ensure an effective and sustainable approach to PSEAH and identify the requisite resources.
- ***Strengthen Risk Management within IOM's overall PSEAH approach***, including identifying and prioritizing SEAH risks and appropriate mitigation strategies for IOM at institutional, regional/country levels and the development of a risk management plan. Additionally, the

development of criteria to identify high-risk countries/programmes is a key element of the evaluation.

Annex D outlines the questions that have guided the evaluation, as presented in the original TORs, and the dimensions of inquiry that were explored under each theme. Some areas were expanded to incorporate emerging issues as data collection evolved and consultants gained a better understanding of the topics at hand.

For purposes of this evaluation, “*PSEA approach*” is understood as IOM’s key PSEAH Policies, strategic framework and operational delivery, including staffing structure, organizational organigram/positioning of core IOM PSEAH-relevant units/departments, as well as structure and functioning of IOM’s internal justice system. IOM’s strategic approach to PSEAH is embodied in the following key documents: *IN/234* (IOM PSEA Policy, 2016), *IN/15* (IOM Standards of Conduct), *IN/90 Rev 1* (Respectful Working Environment), *IN/275* (Misconduct) and *IN/282* (Retaliation), as well *IOM’s PSEAH Strategic Framework* (2021) and the *IOM PSEAH Toolkit and Checklist* (2022).

II. Methodology Overview

Considering the qualitative nature of PSEAH policies and efforts, the consultants relied primarily on a qualitative approach to obtain the information required to address the evaluation objectives outlined in the TORs.

A desk review was initiated at inception phase to assist in further refining the proposed methodology and lines of inquiry. Preliminary desk review covered approximately 100 sources, including PSEAH-relevant policies, guidance documents, training materials, programme presentations, concept notes, PSEA global best practice resources, among others. At this stage, the consultants also worked closely with the PSEAH team in HQ to finalize the list of key informants to be engaged and the data collection tools.

Throughout the months of July and August 2022, individual and group interviews were conducted with a total of 90 key informants across 12 stakeholder groups⁴; these included IOM staff at HQ, regional and country levels, as well as external actors (donors, implementing partners, third-party contractors and peer organizations). The sample breakdown is detailed in the table below.

Table 1 – KEY INFORMANTS	
Stakeholder Group	Number of key informants
IOM	
Executive Office	3
HQ PSEAH-relevant units/offices/departments	26
HQ Programme units/offices/departments and thematic experts	19
CO PSEA Focal Points	6
RO PSEA Focal Points	5
Regional Directors	2
Chiefs of Mission	3
Crisis Coordinators/ Programme Managers	2
EXTERNAL	
Implementing Partners	3
Third-Party Contractors	2
Donors	11
Multilaterals, UN entities, INGOs	10
TOTAL	90

⁴ The sample was identified based on stakeholders' strategic involvement IOM's PSEAH efforts, assuming that they were in position to provide meaningful input to answer the evaluation questions. The complete key informant list can be found in Annex G.

In order to ensure inclusivity and representation of different contexts, the analysis also drew on PSEAH-relevant data extracted from existing UN system-wide and IOM surveys⁵.

For each stakeholder group, tailored semi-structured interview questionnaires⁶ were developed based on selected evaluation questions, as not all key informants were able to contribute to all evaluation criteria and corresponding learning questions.

Upon completion of data collection, interview records were summarized, and key inputs were extracted and systematized using a matrix system. This method enabled information from multiple sources to be analyzed and triangulated in line with each evaluation question.

Analysis was finalized in mid-August and preliminary findings and recommendations were synthesized and presented to the PSEAH team in HQ with the purpose of: a). filling information gaps, b). rectifying inaccurate information, c). validating results. Feedback from the team was incorporated into the analysis and used as a base for producing the first draft of the final report. A final version of the report, incorporating feedback received from the Evaluation Reference Group (PSEAH Task Force), was submitted in October 2022.

Limitations

IOM's wide geographical presence created difficulties for ensuring all contexts were represented in the evaluation. Nonetheless, the selection of key informants was done in a deliberate fashion to ensure the realities of various operational realities were captured and cross-country survey data was used to supplement the analysis when information gaps were encountered.

The absence of a theory of change and a corresponding results framework, underpinning IOM's PSEA approach has, to some extent, compromised an in-depth analysis of "Impact". The consultants also faced challenges addressing a few questions under "Relevance", as key PSEAH policy documents are currently undergoing revision and consensus internally within IOM on some issues has not yet been reached.

Additionally, it has not been possible to speak directly with communities or victims, given the scope of the evaluation methodology and the sensitivities associated with the topic at hand – including the need to abide by highest standards of safety and confidentiality. Victim's perspectives were captured through secondary accounts, notably, IOM staff engaged in community-level work at field-level and staff interacting directly with SEA and sexual harassment victims.

⁵ These include the IOM's 2021 Institutional Questionnaire, the 2016, 2018 and 2019 Workforce Satisfaction Survey; and IOM's responses to the 2021 UN PSEA survey implemented by the Office of the Special Representative on SEA.

⁶ The set of instruments used by the consultants for data collection are presented in Annex H.

The evaluation did not look at the role of the organization (in terms of support or resources) in instances of intimate partners violence of IOM personnel.

III. Analysis & Findings

Established in 1951, IOM is the leading organization working on the issue of migration and became an UN-related organization in 2016. It has a strong operational footprint with over 17,000 staff and related personnel operating through its 440 offices globally. Additionally, it works with an estimated 7,500 third party contracted staff and countless implementing partners. IOM's programming covers a wide range of responses from emergency and humanitarian to transition and development.

In line with the External Evaluation guiding criteria and corresponding lines of inquiry, this section presents analysis and findings identified through the review of inputs gathered from project-related and external documentation, as well as interviews and group discussions with a selected number of key informants.

1. RELEVANCE

1a. To what extent is IOM's approach to PSEAH fit-for-purpose?

Recently, there has been a positive evolution in the way the organization approaches PSEAH with the focus moving from a liability, reputational-centered perspective towards a more robust, structured approach that promotes clearer accountability.

Important steps that stem from this evolution have been the appointment of a Senior Coordinator on PSEAH in 2020 and the establishment of a dedicated PSEAH Unit at HQ-level in 2021⁷, the development of "IOM's Strategic Approach Toward the Prevention of and Response to Sexual Exploitation and Abuse (SEA) and Sexual Harassment", underpinned by five core pillars⁸, and the roll out of the PSEAH Toolkit and Checklist in September 2022⁹, which provides an operational umbrella for IOM's PSEAH approach by coherently and comprehensively guiding IOM offices, staff, and programming in advancing PSEAH,

⁷ IOM was the only UN agency left without a Senior PSEA Coordinator or dedicated global institutional PSEA post by 2020.

⁸ These are: a) Leadership and Organizational Culture; b) Institutional Accountability and Transparency; c) Capacity-Development, Training and Communication; d) Quality and Accessible Victim Assistance; and e) Partnership and Coordination.

⁹ The resource was rolled it out to a small group of persons along its development and the most updated version was presented in June 2022 during the global PSEAH workshop; the official launch was in September 2022 through a global staff advisory.

efforts within IOM across nine priority areas¹⁰. The Toolkit and Checklist includes concrete, practical actions as well as useful links and guidance on “How to get there”.

Another significant achievement within IOM has been the development of a series of training packages to promote behaviour change which uses case studies, testimonies, powerful videos and thought-provoking questions through three modalities: a) facilitator-led face-to-face training (6 hours); b) facilitator-led webinar training (2.5 hours); and c) six online, self-paced micromodules (total 1 hour) which remind colleagues throughout the year of key messages on PSEA. Due to its success, IOM’s face-to-face training was adapted into an Interagency Standing Committee (IASC) training. [*“Saying No to Sexual Misconduct”*](#) and now available in eight languages on the IASC website. Thus far, IOM has trained over 17,000 persons in four languages, which is truly significant given that the PSEA training is primarily facilitator-led and requires extensive human resources to rollout.

At the highest level, there is strong leadership commitment for PSEAH within the IOM Executive Office, which is evidenced by deliberate advocacy efforts by the DG and both DDGs to institutionalize PSEAH widely within the Organization, including by capitalizing on the ongoing Management Reform as an entry point for strengthening PSEAH efforts. Within the Budget Reform process, there are ongoing efforts to ensure all IOM’s PSEAH Unit staff are covered under the Organization’s core funding/administrative budget (currently two of the three PSEAH global staff are covered under the core budget). Additionally, the recently established Internal Governance Framework (IGF), created to support the reforms, provides flexible funding opportunities that can be further leveraged to support PSEAH activities¹¹ moving forward.

IOM has made significant efforts to increase its number of staff dedicated to PSEA.

- As of January 2022, IOM had 11.5 dedicated PSEA staff (8 of those staff were specifically supporting inter-agency PSEA action), across 5 countries.
- By the end of December 2022, the Organization will have in place a total to 61.5¹² dedicated PSEA/H staff (11 of those staff were specifically supporting inter-agency PSEA action, while 50.5 staff will primarily support IOM country office and programming efforts), across 41 countries.

¹⁰ The nine priority areas of the Toolkit focus on: 1) IOM PSEAH Office/Programme Leadership; 2) IOM Human Resources (linked to PSEAH), 3) Building PSEAH Capacity of IOM Staff and Related Personnel; 4) Reporting Incidents of Sexual Misconduct within IOM; 5) Embedding PSEA within IOM Programme/Project Cycle: Proposal, Development/Budgeting, Programme/Project Implementation and M&E; 6) Working with Implementing Partners, Government Partners, and Other Service Providers; 7) Communicating and Increasing Awareness on PSEA within Communities and amongst Migrants and Beneficiaries; 8) Establishing and Strengthening Complaints and Feedback Channels (within communities, projects, and programmes); and 9) Ensuring Access to Quality Victim Assistance.

¹¹ There is indication that the “We Are All In” platform, currently supported through project funding, will also move to core funding in 2023.

¹² For further details on the number of dedicated staff per category, geographic allocation and funding sources, please refer to Annex B.

Table 2 – INCREASE IN DEDICATED HUMAN RESOURCES TOWARD INTER-AGENCY and INTERNAL PSEAH EFFORT			
Level	Jan 2022	Increase	Dec 2022
Inter-Agency	8	(+1) 11.25%	9
IOM	3.5	(+49%) 1500%	52.5
TOTAL		61.5 staff across 41 countries	

IOM’s PSEAH approach is malleable and is adaptable to meet the requirements of the various operational contexts where IOM is present. It promotes minimum standards and actions that should be implemented in every setting to meet basic PSEA accountabilities (e.g.: all IOM offices should have, at least, a PSEA Focal Point appointed), while offering a set of additional provisions for programmes and operational environments facing higher levels of SEA risks.

While the projectized nature of IOM can be viewed as a constraint, it may also be turned into an advantage, allowing resources to be pivoted to meet PSEA needs, in line with the unique requirements of each programme and operational context. Advocacy for including PSEA considerations in project proposals and wider resource mobilization strategies has increased,ⁱ in line with the commitment to institutionalize PSEA, however, a lack of overarching institutional directives that would make this a mandatory requirement in specific contexts, for example, in Level 3 (L3) emergencies, means that PSEA resourcing considerations are still reliant on a willingness and commitment from leadership within each individual IOM operation.

As a highly operational, field-oriented organization that relies heavily on direct programme implementation, IOM is able to pilot and deliver PSEA solutions locally that are more in line with the realities and specific risks of each setting given that SEA risks vary across contexts.

While these elements can be seen as assets to IOM’s PSEAH approach, a few areas of weakness were identified where the approach is not fully fit to the meet the profile of the Organization.

Firstly, the development and consistent implementation of a risk-informed approach would help ensure greater alignment between IOM’s PSEAH approach and its operational delivery, by improving predictability and prepositioning of PSEAH capacities and resources within missions and programmes (especially as means to enhance preparedness). In this regard, some key developments are currently underway, including the development of a risk prioritization framework (second deliverable of the

External Evaluation), and the recruitment of dedicated PSEA staff for select high-risk operations and programmes, as noted in Table 2 above¹³.

Secondly, while the IOM PSEAH Toolkit and Checklist offers comprehensive, user-friendly and relevant operational guidance for offices, programmes and staff on how to deliver on key PSEAH commitments in support of IOM's PSEAH strategy, additional, targeted guidance is needed in critical areas where institutional consensus has not yet been reached or gaps exists. For example, programme or project-level SEA risk analysis, PSEA mainstreaming in projects involving government counterparts, IOM's delivery of the victim-centered approach, etc.

Another important aspect relates to technical and human capacity. The establishment of a PSEAH dedicated unit is much welcomed, yet the size and composition of PSEAH teams in HQ, and PSEAH resources at regional and country levels supporting delivery of the approach are clearly not adequate to cope with the needs of an organization of over 21,000 staff and related personnel and 7,500 third party contracted staff¹⁴, with such diverse areas of programming and a massive geographic footprint (see further below under "Efficiency").

Lastly, PSEAH accountabilities across the IOM workforce – broadly understood as comprising all workers supporting IOM operations, be it IOM staff, consultants and interns, as well as implementing partners (IP), third parted contractors (TPC) staff, and service providers – is uneven. Different types of workers are covered by different prevention requirements, investigation processes and afforded different protection and guarantees depending on their contractual status. For example, daily workers are not sufficiently or systematically targeted by prevention efforts; IP and TPC staff are not covered by IOM's internal justice system, rather they are investigated by their own contracting organization, some of which may not apply the same standards as IOM. For IPs, there are also limitations associated with the inconsistent implementation of PSEA capacity assessments as part of the due diligence process, which are mandatory within other UN entities but not yet made mandatory within IOM (see further details below under "External Coherence" and "Effectiveness").

1b. To what extent is IOM's PSEAH approach aligned with IOM's policy on PSEAH?

Recognizing the need for the Organization to address some gaps in its approach to PSEAH, whilst considering progresses and changes that have taken place in IOM in the past six years (2016-2022) as well

¹³ For further details on number of staff, geographic allocation and funding sources, please refer to Annex B.

¹⁴ IOM workforce comprises approximately 15K IOM staff and related personnel and 6K consultants and interns, in addition to roughly 7.5K staff engaged through third-party contractors.

as recent developments within the UN and the IASC on PSEAH, IOM has undertaken several policy revision processes over the past years¹⁵.

The current ongoing revision of IN/234 (*IOM PSEA Policy, 2016*¹⁶) provides opportunities for the Organization to strengthen its PSEA approach by addressing well-known gaps through a consultative and collaborative process. The Organization is leveraging this revision to reach consensus around specific contentious issues to enhance internal and external coherence. The key points below are currently being discussed internally within IOM as part of the revision process, notably:

IN/234 - Part A: Policy Statement

- Revision of IN/234 (IOM PSEA Policy) statement, including the need to reach consensus on the provisions under IOM Standards of Conduct (IN/15/Rev.1) paragraph 5.42, which is echoed in IN/234 paragraph 10 on:
 - Language on “discouraging” sexual relationships with beneficiaries *versus* “prohibiting” which is still under discussion (see associated recommendation below on how this issue can be resolved);
 - *Paragraph 10 b*) on the extent to which prohibition of sexual activity with children applies to IOM staff member legally married to someone under the age of 18, but over the age of majority or consent if acceptable by both the IOM staff member and spouse’s country of citizenship *versus prohibiting any sexual activity with children (defined as persons under the age of 18)* even if marriage is legal in the country of origin;
 - *Paragraph 10 c*) which highlights standards specifically applicable to IOM staff delivering health services *versus expanding the clause to cover all IOM frontline staff directly interacting with beneficiaries and affected populations*¹⁷.

IN/234 - Part A: Prevention of sexual exploitation and abuse and accountability

- Introduce and clarify roles and responsibilities of the PSEAH Coordinator and PSEAH Unit, as well as any other relevant operational-level staff that support SEA prevention and response efforts;
- Alignment of this specific section of the policy with key institutional developments, such as the establishment of a Senior PSEAH Coordinator position and of the PSEAH unit within the

¹⁵ In the context of the External Evaluation, analyses and recommendations are formulated only for IN/90 and IN/234, noting that the IN/234 and IN/90 Rev.1 are intimately related to IN/275 Reporting and Investigation of Misconduct Framework (2019); IN/15 Rev.1 IOM Standards of Conduct (2014); IN/161 Rev.1 Relatives in the Workplace and Declaration form (2020), and IN/282 IOM Policy for Protection against Retaliation for Reporting Misconduct or Cooperating with Investigations and Audits (2022) but these policies are not presently being revised.

¹⁶ IOM, *Policy and Procedures for Preventing and Responding to Sexual Exploitation and Abuse (IN/234)*, 2016.

¹⁷ This revision could help mitigate the perception that health workers are being stigmatized. While recognizing the specific nature of their interaction with beneficiaries, which includes physical interactions of a very intimate nature during medical examinations, exacerbating vulnerabilities and SEA risks for beneficiaries, it is necessary to also consider the specific safeguarding measures that the health programmes have been implementing in a more consistent manner, including encouraging more gender-balanced teams of medical personnel and amongst medical chaperones, increasing awareness on migrant rights and complaints mechanisms for reporting misconduct, etc.

Executive Office, strengthening of the network of PSEA Focal Points at country and regional levels; and evolution of the role of the Ethics and Conduct Office (ECO), which has changed since the introduction of the “We Are All In” (WAAI) reporting platform).

IN/234 - Part B: Procedures for reporting, responding to and tracking SEA

- Revise the reporting procedures to include the WAAI misconduct reporting platform and strengthen the reporting form;
- Standardize practices and strengthen procedures for reporting, responding and tracking SEA;
- Standardize practices and strengthen procedures for safe and ethical information sharing of identifiable information in the context of investigations (including confidentiality and victims’ informed consent);
- Commitment, guiding principles, and operationalization of a victim-centered approach (VCA) (see further details below under “Effectiveness”).

The External Evaluation has identified additional considerations that, if reflected in the IN/234 PSEA policy revision process, would contribute to further strengthening IOM’s PSEA approach:

- a. Alignment of the policy with overarching IOM vision and commitments to the prevention, mitigation and response to SEA risks with reference to IOM’s Strategic approach toward the prevention and response to sexual exploitation and abuse and sexual harassment (5 priority areas¹⁸);
- b. Adoption of a broader statement prohibiting sexual relationships with beneficiaries, unless otherwise previously disclosed to the Ethics and Conduct Office; IOM’s Relatives in the Workplace form, already in use, should be updated and renamed to clearly address this requirement;
- c. Introduction of IOM vision, guiding principles and operationalization of a victim-centered approach within the revised IOM PSEA Policy (see further details below under “Effectiveness”); For an example of victim-centered approach definition within PSEA Policy and why a victim-centered approach is important to enhance the quality and appropriateness of an organization’s response to cases of sexual misconduct specifically, please refer to Box 1.
- d. Introduction and operationalization of a risk-informed approach to guide decision-making on PSEA prevention and response;

¹⁸ *“IOM must continue to ensure its Strategy towards the prevention of and response to SEAH remains a key priority going forward with a focus on five priority areas: 1) Leadership and Organizational Culture; 2) Institutional Accountability and Transparency; 3) Capacity-Development, Behaviour Change and Communication; 4) Quality and Accessible Victim Assistance; 5) Partnership and Coordination”. IOM’s Strategic Approach Toward the Prevention and Response to Sexual Exploitation and Abuse and Sexual Harassment (2021).*

- e. Clarify and ensure coherence and complementarity between the PSEA Policy and other IOM instructions (IN/90 Rev. 1¹⁹, IN/282²⁰, IN/275²¹);
- f. Establishment of linkages and/or development of specific technical guidance to inform and support the joint operationalization of IOM’s vision and commitments on PSEA;

Box 1 - Rationale for a Victim-Centered Approach (VCA)

Example from UNHCR’s Victim-Centered Approach in Response to Sexual Misconduct

[UNHCR Policy on a Victim-Centered Approach in UNHCR’s Response to Sexual Misconduct](#) defines a VCA “as a way of engaging with victims that avoids re-traumatization, and systematically focuses on their safety, rights, well-being, expressed needs and choice, thereby giving back as much control to the victims as feasible, and ensuring the empathetic and sensitive delivery of services and accompaniment in a non-judgmental manner”.

Note that having a VCA Policy helps to raise the visibility of the VCA within the organization, however the Policy itself does not address how VCA is operationalized within UNHCR.

In UNHCR aforementioned policy, “there are many reasons why, in addition to a coherence organizational approach, tailored, specialized support is required for victims of sexual misconduct, which may require an organization to adopt a victim-centered approach to the way it handles cases of sexual misconduct, including:

- Sexual misconduct is known to lead to **high levels of social stigma and ostracization**, which is less pronounced for other forms of misconduct. In addition, societal and culturally sanctioned ideas about gender and sex can exacerbate the risk victims face including security risks this could include for example so-called “honor related crimes” specific criminal charges and/or punishments.
- Sexual misconduct is known to lead to **more adverse health outcomes often in relation to mental health** including the effect of triggering previous traumatic experiences.
- **Victims of sexual misconduct are less likely to talk about their experiences** than victims of other types of misconduct due to the feelings of shame and guilt associated with the sexual element of the harassment exploitation and abuse. This means that they usually have less family or community support and are more isolated than victims of other types of misconduct, who can often speak more openly about their experiences.
- Sexual misconduct perpetrators generally target vulnerable individuals. In addition to struggling with “why me” questions and self-blame, the victim can also face issues of credibility; perpetrators usually pick victims who are isolated and vulnerable for other reasons, because they are more likely to be dismissed as not credible”.

- g. Revision of application and policy operationalization to cover IPs, TPCs and service providers, including: a) mandatory PSEA IP capacity assessment to be rolled out through a phased approach

¹⁹ IOM, *Policy for a Respectful Working environment: Addressing i) Discrimination, ii) Harassment, including sexual harassment; and iii) Abuse of Authority (IN/90 Rev 1.)*, 2021.

²⁰ IOM, *Policy for Protection against retaliation for reporting misconduct or cooperating with investigations and audits (IN/282)*, 2022.

²¹ IOM, *Reporting and Investigation of Misconduct Framework (IN/275)*, 2019.

- (e.g: targeting initially IPs delivering programmes in high-risk contexts, and those interacting directly with affected populations); b) revision of PSEA contractual clauses (if needed) to reflect any identified change in policy and practice; c) considerations on potential support and oversight by OIG of investigation of cases involving TPC staff as alleged perpetrators, to accompany developments already happening across wider UN-system entities²²;
- h. Reflect IOM's obligations towards information sharing on SEA allegations with Resident Coordinator/Humanitarian Coordinator (RC/HC), as is the case with other UN entities, for example, UNHCR, UNFPA, UNICEF, WFP, UNDP, etc.

In line with the revision of the IOM PSEA policy, the recent updating of IN/go Rev. 1²³ (Policy on a Respectful Working Environment) provides a complementary channel to strengthen the IOM framework on preventing sexual harassment. IN/go Rev. 1 introduces the UN ClearCheck screening database, formal and informal processes for conflict resolution, procedures and measures, and clarifies roles and responsibilities of the various departments involved in addressing abusive conduct, including sexual harassment in the workplace (Department of Human Resources Management (DHR), Office of the Inspector General (OIG), ECO, Office of the Ombudsperson, Department of Legal Affairs (LEG) and the Global Staff Association (GSAC)). In addition, IN/go Rev.1 also contains more specific and improved provisions on interim measures that can be put in place while preliminary assessments, formal investigations, or subsequent disciplinary actions are being conducted. IN/go Rev. 1 is accompanied by practical guidelines to support Policy delivery and reflects the more prominent role assigned to DHR staff on aspects related to respectful work environment issues at the operational level²⁴.

Similar to the IN/234 (PSEA policy) revision, the External Evaluation identified opportunities for enhancing IN/go Rev.1, which was recently finalized and launched in October 2022. The following elements could be reflected in a potential updated Policy or guidelines:

- a. Ensure IN/go Rev. 1 is consistent with IOM's overarching vision and commitments to the prevention, mitigation and response to sexual harassment risks, with specific reference to "*IOM's Strategic Approach Toward the Prevention and Response to Sexual Exploitation and Abuse and Sexual Harassment*", including its five priority areas;²⁵

²² For example, UNFPA, UNICEF, WFP, UNHCR; for reference, please refer to Annex A.

²³ IOM, IN/go Rev.1 opus. cit.

²⁴ IOM Guidelines on Building a Respectful Working Environment at IOM.

²⁵ "IOM must continue to ensure its Strategy towards the prevention of and response to SEAH remains a key priority going forward with a focus on five priority areas: 1) Leadership and Organizational Culture; 2) Institutional Accountability and Transparency; 3) Capacity-Development, Behaviour Change and Communication; 4) Quality and Accessible Victim Assistance; 5) Partnership and Coordination". IOM's Strategic Approach toward the Prevention and Response to Sexual Exploitation and Abuse and Sexual Harassment (2021).

- b. Introduce and clarify roles and responsibilities of the PSEAH Coordinator and PSEAH Unit, as well as any other relevant operational-level staff that support sexual harassment prevention and response efforts (i.e., PSEA and Respectful Work Environment Focal Points²⁶);
- c. Highlight the differential nature of sexual harassment vis-à-vis other types of abusive or inappropriate behaviour in the workplace;
- d. Introduce IOM's vision, guiding principles and operationalization of IOM's victim-centered approach to prevention and response to sexual harassment (see further details below under "Effectiveness");
- e. Introduce gender-sensitive considerations guiding the provision of informal assistance in cases of sexual harassment (e.g.: aspects related to the voluntary and confidential nature of the process, support extended to victims to enable them to make informed decisions on formal reporting or informal resolution avenues²⁷, gender-sensitive mediation processes that consider victims' needs and priorities, including mediator, venue, peer-support, psychological support²⁸, etc.);
- f. Establish links and develop specific technical guidance to inform and support the collective delivery of IOM's approach on sexual harassment.

1c. To what extent is the PSEAH approach responsive to beneficiaries' needs and priorities?

The Evaluation has not engaged with IOM beneficiaries or SEAH victims to respond to this evaluation question, but analysis of secondary documentation and indirect accounts shared by key informants have led to the identification of a set of shortfalls related to SEAH complaints handling process, from the point of reporting to investigation and victim assistance, up to case closure²⁹. Strengthened efforts are needed to ensure the PSEAH approach is able to more fully reflect and meet the needs and priorities of beneficiaries and affected individuals, in particular, SEAH victims and populations on the move.

Firstly, IOM's "We Are All In" (WAAI) is not entirely suitable for communities and affected populations to use given the fact that reporting barriers are exacerbated when local complaints and feedback

²⁶ Note that while Respectful Work Environment Focal Points can listen to understand, help visitors explore options and inform colleagues about policies, they do not take any action and cannot be used as reporting mechanism due to their ethical duties and independent role, as established in the Office of the Ombudsperson's Charter.

²⁷ Informal resolution avenues may involve mediation by managers, CoM or the Office of the Ombudsperson, whereas formal avenues involve an investigation by OIG and, potentially, administrative disciplinary measures against the offender if sexual misconduct is proven.

²⁸ "One of the most impactful and early steps in promoting a VCA was the decision (...) to establish the position of Victim Care Officer (VCO). The VCO, a licensed clinical psychologist, provides confidential psychosocial support, guidance and accompaniment to victims of SH. The VCO helps to identify and assess risks victims may face and ensure their needs are met irrespective of the resolution process they choose". [UNHCR's journey towards a victim-centered approach, Diane Goodman, Blanche Tax and Zuhura Mahamed, page 69. Humanitarian Exchange, Issue 81 June 2022, Humanitarian Practice Network \(HPN\) at ODI.](#)

²⁹ It is important to acknowledge that there are difficulties inherent to the topic, as PSEAH is a highly complex, sensitive issue to discuss with staff and beneficiaries and raise awareness on, particularly in contexts where gender inequality and gender-based violence (GBV) are widespread and seen as culturally acceptable.

mechanisms (CFMs) are not designed to meet community preferences and remain inaccessible to the most vulnerable (who are also those at higher risk of SEA). For sexual harassment, while the WAAI platform provides a safe, appropriate, streamlined method of reporting for IOM staff, widespread fear of retaliation and stigma continue to prevail and act as major deterrents to reporting³⁰.

As relayed by key internal IOM informants who liaise with survivors³¹, SEAH victims have shared that their experience with IOM's complaints handling processes was re-traumatizing and not fully guided by survivor-centered considerations. For example, victims expressed frustration over the number of times they were asked to repeat their stories, the line of questioning and the nature of some of the questions asked, which they saw as inappropriate, and the overall perception that they had to "prove their case"³². Sexual misconduct can be particularly challenging to prove, especially when victims have limited or no access to legal support, as may happen especially for SEA victims (for a more detailed analysis of investigations and the victim-centered approach, please see corresponding sub-headings under "Effectiveness"). This brings an important discussion regarding whether it would be at all possible for IOM to reconsider the appropriateness of the standard of proof it applies to misconduct cases, which are set per the caselaw of the International Labour Organization (ILO) Administrative Tribunal, potentially even going as far as revisiting the decision to subscribe to this specific body to adjudicate cases of sexual misconduct and consider other options that provide lower standards of proof.

Another limitation uncovered within IOM is that there seems to be insufficient institutional prioritization for the victim-centered approach, starting with clearly assigned organizational accountability for victim assistance, and corresponding guidance (or directive) on how it should be delivered and resourced at the operational level, in a way that reflects missions' varying capacity levels and, in particular, meets the needs of highly mobile populations. Progress on the victim-centered approach across all entities involved in PSEAH is needed to ensure IOM's approach is better attuned to the needs and priorities of all SEAH victims, especially those on the move, as this beneficiary group is central to IOM's mandate.

Lastly, current approaches, even those that are being strengthened, focus on cisgender adult survivors. There is urgent need to expand technical expertise, resources, guidance and develop approaches that are fit for purpose for children and people with diverse sexual orientation, gender identity, gender expression and sex characteristics (SOGIESC).

2. INTERNAL COHERENCE

³⁰ Please refer to IOM's "PSEA Mission Report: Analysis and Recommendations" (2018-19) by Dixit Communications.

³¹ This information was shared by informants engaging with victims; the External Evaluation did not engage directly with victims.

³² OIG highlights that it is guided by survivor centered considerations and its function is of an independent and neutral fact finder. The jurisprudence and due process requirements by which OIG must abide require that the accused be heard, be allowed to present countervailing evidence and be afforded the presumption of innocence. In its investigations OIG must balance these considerations. If it fails to do so, the disciplinary process will be compromised and measures against the perpetrator will not be possible.

2a. To what extent do IOM's internal policies, objectives and practices promote a coherent, comprehensive approach to PSEAH?

The development of IOM's PSEAH Strategy (2021), the IOM PSEAH Toolkit and Checklist (2022), the revitalization of the IOM HQ PSEAH Task Force (2021), efforts to embed PSEAH in institutional policies, frameworks and processes, such as the IOM's Strategic Results Framework (SRF), the IOM Global Report, Country and Regional Offices' Strategies and the IOM yearly Institutional Questionnaire (IQ) have, indeed, set the foundation for a more coherent approach to PSEAH.

Building on these efforts, the integration of PSEAH within the objectives and components of the Internal Governance Framework (IGF) should be strengthened. Capitalizing on this funding opportunity to promote more explicit inclusion of PSEAH within the objectives and components of the IGF should be encouraged. Ultimately, the inclusion of PSEAH as an area of funding within the Framework would also help to make its objectives and components less organization-centric, better reflecting accountability to affected populations (AAP), as reflected in Objective 1 on Accountability, while also bringing the needs and priorities of SEAH victims to the fore, by supporting a victim-centered approach to IOM's internal justice systems.

The PSEAH Unit has been able to work collaboratively with various departments, divisions and units within HQ, for example, DHR, LEG, Office of Staff Security (OSS), the Gender and Diversity Unit³³ (GDU), Risk Management Unit, Protection and GBV experts, among others; however, current levels of coordination between the various PSEAH-relevant departments at HQ-level is insufficient to ensure the coherent delivery of the PSEAH approach, especially given the siloed approach (e.g. OIG tends to be selective with their engagement and the sharing of information related to their systems and processes as it is meant to work as a "separate", independent entity). In fact, a large number of field-level informants manifested the perception that PSEAH-relevant units and departments in HQ are not speaking with the same voice on PSEAH issues, which makes the overall system appear disjointed, clouding internal coherence and effectiveness. For example, informants mentioned receiving conflicting or unclear messages from different HQ-level entities on the role of the PSEA Focal Point in relation to the complaints handling process (i.e., whether the Focal Point should be notified of SEA cases arising in their context, or whether the sharing of information with anyone other than with OIG would constitute grounds for misconduct charges). Similarly, there is confusion on issues related to interim measures for preventing risks of recurrent abuse and retaliation while the investigation is underway, including which entity within HQ has ultimate decision to remove the alleged abuser from the workplace and who should be responsible for implementing interim measures at country-level and under which circumstances.

³³ PSEAH Unit and GDU staff frequently deliver joint PSEA training to staff, not least because GDU continues to house IOM's WAAI platform.

Ensuring that core PSEAH-relevant entities in HQ negotiate their differences constructively, reach consensus and communicate consistent messaging on critical PSEAH issues is therefore critical for boosting internal coherence, effectiveness and amplify the impact of IOM's approach, as well as build trust in the system.

While there has been strengthened collaboration at HQ with the appointment of the PSEAH Senior Coordinator in 2020 and the subsequent re-establishment of the IOM PSEAH Task Force in 2021, a shift in approach to a more results-orientated manner within this governing structure could leverage the support of convening key units and departments to produce tangible joint PSEAH deliverables; that can then be rolled out to IOM operations globally to ensure all areas and levels of the Organization are aligned and coherently delivering on their PSEAH accountabilities.

Major internal coherence challenges were identified across specific areas, as explained subsequently.

While noting undeniable, remarkable progress towards a more robust and comprehensive PSEAH framework that will set the foundations to strengthening IOM's PSEAH approach globally; until recently, there appears to have been more institutional efforts committed to strengthening IOM's reporting and investigations functions than to developing and operationalizing a comprehensive victim-centered approach for the Organization. In addition, prevention and response to SEAH are guided by a series of institutional policies delivered by multiple entities within IOM whose procedures are complex to grasp and largely inaccessible to the average IOM staff, let alone to IOM beneficiaries and victims.

There are also unresolved policy and legal issues, including those related to IOM's stance on specific UN/international standards and principles³⁴ that undermine internal coherence and carry over to the operational level, sometimes hindering a missions' ability to deliver on collective, country-level PSEA responsibilities due to uncertainties around commitments that IOM can or cannot subscribe to (for a detailed discussion and tangible examples see below under "External Coherence").

At the operational level, the External Evaluation also identified culture imbalances between IOM programmes and operations in humanitarian and development settings. These include differences in investment in GBV/Protection/PSEA-dedicated expertise, dissemination of guidance and tools to support PSEA mainstreaming across sectors, and synergies with the Protection and GBV/Child Protection sectors. As a result, more robust PSEA strengthening and integration efforts were identified within humanitarian programmes and operations, not least due to more consistent presence of GBV/PSEA technical expertise and knowledge (including on GBV guiding principles, SEA safe reporting, referral of victims to appropriate services, community participation in projects/programme design, with special focus on women and girls, etc.). In the humanitarian space, IOM has also heavily contributed and benefited from investments made in collective inter-agency structures at both global and operational levels, where it has led the set-up of coordination platforms, contributed to the development of technical

³⁴ See below under "External Coherence" for more details.

guidance, financially supported and capacitated dedicated inter-agency PSEA Coordinators on behalf of the Inter-Agency Standing Committee (IASC) and the UN, etc. The pace of operationalization of PSEA commitments, processes, and practices in so-called development settings has not been as steady or systematic globally speaking, a discrepancy that is also visible within IOM programming areas and operations.

Furthermore, uneven practices and differences in investments and availability of specialized human, technical and financial resources also lead to inconsistent PSEAH approaches at regional and country levels within IOM. While the former Gender Coordination Unit (GCU) managed to accomplish important milestones on PSEAH with very limited resources, in particular on the capacity building and awareness-raising front, until the establishment of a dedicated structure on PSEAH, the issue remained largely driven by committed individuals, rather than anchored on a standardized, institutional approach to prevention and response. In some areas this weakness is quite pronounced, for example, the SEAH reporting and complaints handling process, including referral of victims for assistance, is structured differently in each mission, leading to varying results in terms of quality and effectiveness (for a detailed discussion, please refer to the “Victim-Centered Approach” below under “Effectiveness”).

Lastly, further coherence is needed on aspects related to IOM’s engagement with service providers, IPs and TPCs. Contracts signed with service providers, TPCs and IPs include standard PSEAH clauses; some IPs deem IOM’s provisions to be as robust as those included in contracts signed with other UN entities. But there is a strong indication that their implementation is not systematically or sufficiently monitored by IOM at the operational level. In the case of TPCs, anecdotal evidence suggests that PSEAH induction during onboarding is not consistent, leading to coverage gaps in prevention efforts for different categories of staff working for IOM. The uncertainty around TPC’s and IP’s capacity to deliver victim-centered investigations and safely refer victims to services is another gap that affects the implementation of a coherent and comprehensive approach to PSEAH.

3. EXTERNAL COHERENCE

3a. To what extent has IOM’s approach on PSEAH been consistent with UN international norms and standards to which IOM adheres?

The five pillars of IOM’s PSEAH Strategy (2021) are closely aligned with standards and indicators of the Multilateral Organization Assessment Performance Network (MOPAN), the OECD DAC, and the IASC Minimum Operating Standards. Efforts to progressively align with UN standards have been slow due to a lack of dedicated PSEAH capacity at HQ-level, but recently accelerated with establishment of the IOM PSEAH Unit in 2021, insofar there is now a small, dedicated team at the highest level of the Organization tasked with moving institutional PSEAH efforts forward.

While IOM’s goal is to align to UN and international standards as much as possible, the revision of systems and practices has been slower and should entail a proper exploration of advantages and

disadvantages of subscribing to international policies and standards that differ from systems and procedures currently in place within IOM, especially by considering specific areas in which IOM's policies are affording more protection to beneficiaries and victims than those promoted by UN/international standards (for more, see above under "Internal Coherence"). As mentioned earlier, some unresolved issues around international norms and standards relate to, for example, IOM's stance on the handling of personal data within mandatory reporting for SEA (related to issues of survivor consent)³⁵, under-age marriage, endorsement of country-level standard operating procedures (SOPs) for interagency referrals of allegations to the relevant organization for follow up and for referral of survivors to assistance, information sharing of non-identifying information on SEA cases with RCs/HCs, the use of UN's Incident Reporting Form (IRF), operational delivery of the Victim Assistance Protocol, mandatory IP capacity assessments, among others.

Moving forward on these areas requires PSEAH-relevant IOM units and departments to carefully reflect and reach consensus on a range of complex issues that have implications for multiple areas of IOM's operations, as well as, more importantly, IOM's beneficiaries and victims themselves. As with the revision process on PSEAH-relevant policies, this endeavor should not be approached as a technocratic exercise; a guiding consideration should be, as noted earlier, those specific areas in which IOM's policies are affording more protection to beneficiaries and victims than those promoted by UN/international standards (e.g.: IOM's stance on the use of the victims' personal data for investigations is more victim-centered than the current UN position on this matter).

Undisputedly though, momentum is ripe for IOM; a Management Reform is underway and key policy documents are being updated. These internal developments synergize well and can be deliberately timed to coincide with discussions on IOM's position on UN/international principles and standards. Global PSEAH discussions, especially within the UN system, have evolved significantly in recent years, and this enables IOM to rely on the most up to date PSEAH best practices and standards to guide decision-making.

³⁵ Resolution on this issue was achieved while the External Evaluation while underway. The possibility of sharing personal data of victims with OIG without the victim's consent is not currently foreseen. IOM's data protection principles (IN/138) affirm consent as the legal basis for collecting and sharing personal data. Further, IOM's Data Protection Manual (MA/88) defines consent as free, voluntary and informed. In practice, this means that informed consent is based on a clear appreciation and understanding of the facts, implications and future consequences of any action, including a decision to share personal data for the purpose of reporting SEA. Per IN/234, all IOM staff have a duty to ensure that confidentiality and the IOM Data Protection Principles are respected in reporting SEA. According to best practice on managing incidents of sexual and gender-based violence, confidentiality means not disclosing any information at any time to any party without the informed consent of the person concerned (GBV Case Management Guidelines, 2017). The UN Policy on Integrating a Human Rights-Based Approach to UN Efforts to Prevent and Respond to SEA states that disclosure of confidential information is done according to the informed consent of the concerned victim and an assessment of the potential implications the disclosure of information may have on her/his protection.

It is however critical that milestones and timelines be set for resolving IOM's position on the adoption of UN/international norms standards, and moving forward with any associated institutional reforms, at the risk of compromising legitimacy, accountability and effectiveness if these are not expedited.

3b. To what extent are IOM's efforts adding value to the work of PSEAH international bodies, if at all?

IOM is widely recognized for its commitment to system strengthening on PSEAH; it understands that results can be best achieved and maximized if the whole system performs in an optimal manner. In contrast to the inward-looking nature of most UN entities, this feature is seen by donors as unique to IOM and a major asset brought by the Organization. IOM's commitment to system strengthening is evidenced by the number of staff it funds exclusively on behalf of PSEA inter-agency coordination platforms at both global and mission levels³⁶, the lead role played by the organization in promoting and disseminating inter-agency community-based complaint mechanisms (CBCM) guidance and best-practice, capacitating inter-agency PSEA Coordinators, and other initiatives that have supported and benefited collective PSEA efforts.

There is, however, a visible disconnect between the prominent role played by IOM in driving system wide PSEA efforts forward, especially during Director General Swing's championship, and under-investment in its own internal PSEAH resources, systems and structures, which, until recently, were not on par with the international standards IOM so keenly promoted. The creation of a dedicated PSEAH Unit in 2021 is a recent development and this accountability void stood as a major constraint hindering significant progress on PSEAH internally within the Organization for many years. The former Gender Coordination Unit (GCU)³⁷ moved many PSEAH efforts forward in the interim, but this function was in addition to its many other gender-related responsibilities. It is however important to highlight that, despite very limited resources, GCU was able to achieve important PSEAH milestones, such as the development and roll out of the IOM PSEA training which was adapted into an interagency PSEA training (*Saying No to Sexual Misconduct*) and the creation of the WAAI misconduct reporting platform to name a few.

3.c What comparative advantages (and distinct assets) does IOM have on PSEAH and to what extent are these comparative advantages being fully exploited?

IOM's commitment to system-strengthening has played an important part in helping to raise the Organization's global profile and in securing a significant footprint in global-level PSEA inter-agency coordination platforms. The establishment of a senior-level PSEAH Global Coordinator position within IOM, which did not exist prior to 2021, offers opportunities for the Organization to position itself more strategically in global level inter-agency PSEA platforms to support both PSEA inter-agency efforts and

³⁶ Currently, IOM supports a total of nine staff exclusively dedicated to support collective, inter-agency PSEA platforms, two of them at the global level within the Department of Operations and Emergencies (DOE) and seven staff at the country-level (1 in Bangladesh, 1 in Jordan, 5 in Turkey). For further details on the number of dedicated staff, geographic allocation, funding sources and additional recruitment plans, please refer to Annex B.

³⁷ Now renamed Gender and Diversity Unit (GDU).

to share best practices and lesson-learned from IOM's own operations, especially considering that major humanitarian crises currently are IDP-focused responses. Moreover, IOM also has a dedicated HQ-level inter-agency team tasked exclusively with supporting collective PSEA efforts.

Donors and peer INGOs widely recognize IOM's strong Protection/GBV expertise. External key informants engaged as part of this evaluation praised the quality of IOM's Protection/GBV staff and programming, and lament that despite this, stand-alone, dedicated Protection and GBV programming is not consistently prioritized within IOM operations, with more attention and investments being channeled to technical sectors traditionally led by IOM (Camp Coordination and Camp Management (CCCM), Shelter, etc.)³⁸. While a discussion on IOM's identity and strategic positioning within the Protection sector is beyond the scope of this evaluation, it is worth recognizing that there is opportunity for securing more steady investments in Protection and GBV programming, which, in effect, enable IOM to strengthen its capacity to deliver victim assistance services through its own Protection/GBV programmes.

IOM's strong technical capacity in GBV and successful track-record experience embedding GBV risk mitigation approaches into the work of wider sectors provide the Organization with a wealth of institutional knowledge that can be easily transferred to the PSEA field to align IOM with current PSEA best practices, particularly on victim assistance and in ensuring a victim-centered approach.

Note that, in the early days, in global aid sector discussions, PSEA was initially perceived as a Protection/GBV issue to be dealt with by Protection/GBV practitioners; and this discourse has unintentionally relieved other sectors and operational areas of important accountabilities, for example, SEA risk mitigation or the systematic mainstreaming of PSEA within programming. Subsequently, the discourse evolved to framing PSEA as an organization-wide responsibility that pertained to everybody and nobody in specific, which has ultimately contributed to blur accountabilities and dilute the role of Protection/GBV experts (who have, however, an important technical role to play on PSEA, in particular, by supporting aspects related to the victim-centered approach). Recently, best practice evolved to promote arrangements where "the pendulum shifts to the middle"; while PSEAH is recognized as an issue that requires efforts across multiple areas of the Organization and programmes, Protection/GBV-related dedicated expertise is seen as critical to strengthen the quality and impact of PSEA efforts, not least, to ensure that these are grounded on a victim-centered approach and effectively contribute to the mitigation of SEA risks.

In keeping in line with the current best practice, i.e., an institutional approach to PSEA that keeps the "pendulum in the middle", IOM's model for operational delivery of GBV in crisis settings (GBViC Institutional Framework; GBViC IFW), systematically strengthened over the past nine consecutive years

³⁸ Notably, in the past 7 years, IOM has been able to successfully embed Protection, Gender and GBV (and most recently PSEA) expertise in technical sectors where it has a clear mandate on and leads in within major emergency operations and this may open doors for further investments in Protection/GBV/SEA-dedicated programming.

(2013-2022) through a dedicated institutional capacity building project funded by the United States' Bureau of Population, Refugees, and Migration (BPRM), is a testament to IOM's remarkable achievements in promoting GBV as an organization, sector-wide priority, while ensuring these efforts are supported by specialized, Protection/GBV technical expertise.

In practice, being a frontline, proximity organization that relies strongly on direct implementation, means that IOM staff are also closer to where SEA risks are. While, on the one hand, this may put the Organization at higher risk of SEA, on the other, if leveraged strategically, it means the Organization is well placed to identify SEA risks that are unique to each operating context and to use this analysis to inform safer programming strategies (for its own programmes and others'). Coupled with the projected funding structure, IOM has the opportunity to build on contextual, risk informed PSEA strategies to pilot solutions locally and resource them accordingly. The resulting lessons-learned would be valuable to enhance the PSEA global evidence base, ultimately, also raising IOM's visibility vis à vis peer organizations and donors.

3d. To what extent are IOM's efforts complementary to, and coordinated with, other actors' interventions on PSEA

Overall, there is a good degree of collaboration and coordination between regional and country level IOM missions and the GBV sector and actors, as well as inter-agency PSEA coordination structures, but the nature and consistency of the engagement depends on the strength and how well-articulated these actors and structures may be in the given context. IOM has played a significant role in supporting the set-up of inter-agency PSEA coordination structures in several countries, and actively funds PSEA inter-agency coordinators and support staff across various operations³⁹. As discussed earlier, resolving IOM's stance on some inter-agency PSEA principles and standards still pending (for example, endorsement of inter-agency standard operating procedures (SOPs) and information sharing protocol), should contribute to ensure more coherent and consistent representation of IOM in country-level inter-agency PSEA coordination platforms.

Generally, the focus of the engagement with inter-agency PSEA actors and structures tends to be on referral of SEA allegations to relevant organizations and referrals to GBV service providers for victim assistance when these cannot be provided through IOM's own Protection/GBV programming. IOM has global-level bilateral Memorandum of Understanding (MOU) with UNICEF and with UNFPA currently in place, but these do not address the issue of providers of last resort, an issue that should be discussed at the institutional level and reflected in any new MoU update. Guidance on how operations can activate these partnerships at mission-level when there are no GBV services available should also be reflected in inter-agency referral SOPs.

³⁹ Currently, IOM supports a total of seven country-level staff exclusively dedicated to support collective, inter-agency PSEA platforms. For further details on the number of dedicated staff, geographic allocation, funding sources and additional recruitment plans, please refer to Annex B.

Coordination with governments on PSEA is contingent upon buy-in and political will and can be especially challenging in conservative contexts where SEA is considered a taboo or where governments may not want to recognize that their personnel engage in SEA. When programmes are implemented jointly with governments or through their partners, a reality facing most IOM missions delivering programmes, strategic guidance is needed to support them in advocating for PSEA and safer programming, and, within well-known limitations, contribute to accountability for SEA cases involving government counterparts, as these are not covered by IOM's internal justice system. This issue of PSEA and governments is a challenge facing other organizations as well.

4. EFFECTIVENES

4a. What are IOM's greatest strengths, weaknesses, opportunities and threats to effective PSEAH?

The below figure summarizes key results from the SWOT analysis of IOM's PSEAH approach.

STRENGTHS

- Senior leadership commitment within IOM on PSEAH and the recent Management Reform has put PSEAH high on the agenda; steady progress achieved in the last 1-2 years as a result of a more targeted, structured, coherent and comprehensive approach to PSEAH, including the set-up of dedicated PSEAH unit within IOM.
- Organization has a strong operational footprint (operational in almost all countries globally) and heavily involved in direct implementation: well-placed to assess and identify SEA risks, if systematically oriented by a risk-informed approach to operations and programme delivery.
- IOM seen as a leader in developing PSEAH capacity building and awareness raising materials for UN institutions, IASC, as well as personnel and partners.
- Inter-agency PSEA dedicated project to support collective PSEA action within IOM's Department of Operations and Emergencies (DOE).
- Confidential and safe reporting platform on misconduct, including sexual exploitation and abuse and sexual harassment developed within IOM (*We Are All In*) to channel reports and build trust within the system.
- Operationalization of IOM's PSEAH approach through the development and launch of practical Toolkit which provides concrete actions, guidance and tools to use within IOM's programmes, projects and offices.
- IOM is guided by, and committed to, a system-strengthening approach through investments in inter-agency, collective actions
- Investments in IOM PSEA training has led to increased awareness raising on PSEA globally
- Flexible funding model, in that financial resources can be pivoted to PSEAH, including through inclusion of dedicated budget lines within projects and programmes when there is commitment and buy-in from country-level and programme staff (it should be highlighted, though, that this flexible funding model can also be a weakness).

OPPORTUNITIES

- Management Reform current underway in IOM, as well as the recent establishment of a dedicated PSEAH Unit within the Executive Officer under the DDG for Management and Reform and the revitalization of the PSEAH HQ Task Force leverages strong leadership for moving forward.
- IOM, as a projectized organization, creates an enabling environment to pivot funding toward PSEA (staffing and results/activities linked to prevention and response efforts, as needed).
- Advantages of being an institutional “late comer” to strengthening PSEAH efforts internally (as mentioned, IOM initially focused its work on inter-agency PSEA collective actions); as a result, the most up-to-date standards on PSEAH can be used to guide decision-making.
- IOM is in the process of updating its PSEA Policy and this External Evaluation can provide recommendations and the evidence-base to strengthen its approach.
- Given the recent launch of the IASC Strategic vision 2022-2026, IOM can align its PSEAH strengthening efforts.
- IOM’s OIG is currently developing its SEAH Investigation SOPs; it can be strengthened to ensure its approach is victim-centered and used to better communicate OIG’s systems and processes to relevant stakeholders.
- Launch of the IOM PSEAH Checklist and Toolkit to ensure that CoMs/HoO, Programme and Project Managers, Project Development Officers, Resource Management staff, M&E experts, and PSEA Officers and Focal Points are better equipped to prevent and respond to SEAH and see themselves as key actors within programming and offices and throughout operations.
- Timely External Evaluation with key findings and recommendations to help the Organization move forward and strengthen its approach institutionally and collectively.
- The External Evaluation revealed that CoMs see themselves as key actors in supporting SH efforts and this opportunity should be leveraged
- Community and practice of dedicated PSEA Officers and PSEA focal points will be in place by end of 2022, covering all IOM regional and country offices globally

WEAKNESSES

- Small PSEAH Unit to support IOM initiatives globally, with such a diverse range of programming and operational environments, across various cultures and languages, as well as challenges to actively participate in the large number of UN and IASC SEA and SH workstreams that exist to move collective PSEAH deliverables forward.
- Small time-bound funding to support global PSEAH initiatives received through MIRAC which does not provide a level of predictability or enable effective long-term planning of strategic PSEAH outcomes.
- IOM PSEAH approach perceived as “top-down” and not tailored to the needs of IOM’s beneficiaries (i.e., populations on the move), as well as major gaps in the Organization’s application of the victim-centered approach.

- Investigation process is perceived as unclear, lengthy and not fully in-line with survivor-centered approaches⁴⁰, which contributes to a lack of trust in the system.
- WAAI misconduct reporting platform, while welcomed, needs to better link with community-based reporting and feedback mechanisms and offer possibilities for systematic victim assistance.
- PSEAH communication in need of strengthening and strategic direction so it can more effectively contribute to building trust in the system and foster behaviour change.
- Systematic monitoring and design of some existing indicators used to track PSEAH efforts globally in need of strengthening; furthermore, there is an absence of indicators to monitor and assess how IOM's internal justice system is performing collectively, including links between the different units (see 6b. "Impact").
- No institutional directive establishing mandatory PSEA resource mobilization/allocation requirements within global, regional and country programmes and operations.
- Lack of dedicated PSEA Officers/Staff to support PSEA action and over-reliance on PSEA Focal Points who are expected to deliver significant support but who work on PSEA up to 10% of their time and on top of regular or other voluntary responsibilities; additionally nominated PSEA Focal Points do not always have the technical background to integrate PSEA throughout IOM programming and operations (despite criteria for nomination being clear within the PSEA Focal Point ToRs).

THREATS

- Risk-informed approach, including collaboration with local referral pathways, not formalized and consistently applied to promote safer programming from the onset (would minimize likelihood that SEA happens in the first place and also ease burden on IOM's internal justice system).
- General feeling of mistrust among staff creating barriers to reporting; fear of stigma and retaliation, perception that the process is not victim-centered and that the abuser will go unpunished, lack of understanding of roles and responsibilities of different IOM units, etc.
- Gaps in jurisdiction over IP and TPC staff on SEAH; this threat is compounded by absence of systematic IP PSEA capacity assessments (not yet mandatory for IOM).
- Confusion around role/responsibilities of IOM PSEAH Unit, including expectations that it could potentially be involved in safeguarding for children (e.g.: child safeguarding policy development) which is difficult due to limited staffing, capacity and expertise.
- COMs within IOM see themselves as sidelined in sexual harassment discussions.
- Lack of consistent commitment and buy-in from missions, projects and programmes in prioritizing PSEA and effectively resourcing PSEA functions and operations.

4b. To what extent has IOM's approach to PSEAH been effective?

⁴⁰ As relayed by key internal IOM informants who liaise with survivors.

Undeniably, there has been critical progress and important milestones achieved within IOM's wider PSEAH efforts in the recent years, notably:

- The establishment of the IOM PSEAH Senior Coordinator role, and the set-up of a dedicated PSEAH unit (2 out of 3 staff core-funded in 2022), demonstrating commitment, centrality, and prioritization of the PSEAH issue internally within IOM.
- Mandatory training on PSEA to all IOM staff and related personnel has a good degree of coverage and has effectively raised staff awareness on IOM's reporting channels.
- The success of IOM's PSEA training resulted in the development of an inter-agency PSEA training ("Saying No to Sexual Misconduct"); six PSEA micro-modules with key messages to prevent the forgetting curve were developed, which were subsequently rolled out in 2021 in English and 2022 in Spanish and French (with other languages currently in the pipeline)⁴¹.
- Development and launching of the "Best Practices in the Prevention of Sexual Exploitation and Abuse (SEA) in Resettlement and Movement Operations," a self-paced, virtual PSEA learning course developed to address specific movement management and resettlement risks, scenarios, and mitigation measures.
- The IOM HQ PSEAH Task Force was revitalized, and Terms of Reference updated to reflect the changing landscape of PSEAH.
- The launch of the IOM PSEAH Toolkit and Checklist in September 2022, as a critical resource that provides an operational model for implementing IOM's approach to PSEAH, outlining practical actions that IOM's offices and programmes should take to deliver on PSEAH accountabilities.
- Integration of PSEAH modules within the IOM Chief of Mission training and the IOM Emergency Response and Induction Training (ERIT) for staff preparing for deployment to emergency and humanitarian contexts.
- Establishment of a formal, duly appointed, network of PSEA Focal Point across all IOM offices⁴² coupled with the roll out of standard, formalized Terms of References (TORs) for PSEA Focal Points and Officers as of late 2021, ensuring a more coherent use of PSEA human resources at country and regional levels.
- Efforts to strategically hire dedicated-PSEA staff across high-risk programmes and operational contexts, with a several pilots currently underway with funding from the United States Refugee Admissions Programme (USRAP), United Kingdom Afghan Resettlement Assistance Programme, Canada Resettlement Programme, Global Health Assessment Programme (GHAP), and regional Ukraine crisis response.

⁴¹ PSEA micro-modules with a focus on: 1) demystifying power relations; 2) defining sexual misconduct; 3) leading by example; 4) understanding how a victim can be impacted by sexual trauma; 5) IOM's duty of care to victims of SEA; and 6) reporting SEA within IOM. Each micro-module features interactive exercises, new case studies, and two new animated videos emphasizing the use of a victim-centered approach and the Do No Harm principle. The IOM PSEA micro-modules, while benefitting all IOM staff and partners globally, are especially beneficial for those in direct contact with affected populations and/or those who are sent on rapid deployment. Each PSEA micro-module ends with a reminder on the obligation to report SEA, highlighting the use of IOM's awareness raising and misconduct reporting platform *We Are All In*.

⁴² The PSEAH unit has implemented a staggered approach, nominations have been completed for ROs but are still trickling in for COs.

- Rollout of the UN ClearCheck throughout IOM.
- Inclusion of PSEA in the onset of the Ukraine response.
- IOM co-leads the UN Chief Executive Board Task Force on Sexual Harassment, Workstream on Prevention and Behavioural Science, with the UN Secretariat.
- Through a dedicated inter-agency PSEA project, IOM continues to support collective PSEA actions at the country level, including strengthening inter-agency PSEA Networks and UN Country Team/Humanitarian Country Team PSEA approaches. IOM also leads the global PSEA Coordinator capacity building initiatives and thus far, has capacitated a pool of over 100 future inter-agency PSEA Coordinators. The Organization also contributed extensive support to the IASC through the development of Generic Terms of Reference, aimed at harmonizing the roles and responsibilities of PSEA Networks, PSEA Focal Points, and inter-agency PSEA Coordinators.
- Two areas of work currently in the pipeline are: 1) “Together We Say No” campaign with WFP and Translators without Borders which will be available in 27 languages targeting frontline workers who are in direct contact with affected populations with simple PSEA messaging through audio and visual communications; 2) Prevention of Sexual Harassment internal communication campaign currently underway.

The five areas below are those identified as those most in need of strengthening to enhance the overall effectiveness of IOM’s PSEAH approach.

Sexual Harassment

Several internal gaps were identified in relation to sexual harassment. In addition to staff generally confusing the terminology “sexual harassment” vs “sexual exploitation and abuse”⁴³, including which carry mandatory reporting obligations, key informant interviews have consistently indicated that critical mission-level stakeholders, including CoMs, Security and DHR staff, as well as Respectful Work Environment (RWE) and PSEA Focal Points, are not clear on what their role should be when confronted with sexual harassment allegations. Although this may be true for both SEA and sexual harassment, the latter was identified by these stakeholders as an area of greater potential influence, given the general perception that SEA allegations fall largely outside their competence and are to be dealt primarily by OIG.

Furthermore, CoMs feel that they have been largely sidelined in sexual harassment discussions but see themselves as key actors, especially in advancing early warning systems that could help curb inappropriate conduct before it escalates into more serious forms of harassment, and in addressing,

⁴³ *Sexual Exploitation / Sexual Abuse (SEA) is the abuse or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes or the actual or threatened physical intrusion of a sexual nature by UN personnel, their implementing partners or other aid workers, against the people they serve (victim is a beneficiary or part of the affected population). Sexual Harassment (SH) is any unwelcome conduct of a sexual nature when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment by UN personnel against each other, or against any other individual (victim is UN personnel).*

locally, some forms of sexual harassment that could be tackled through management action, should the affected individual choose not to pursue a formal investigation.

When faced with sexual harassment disclosures, mission-level actors tend to disseminate the same default message, which is to refer the victim to the WAAI platform, without fully realizing that this will trigger an official complaint handling process⁴⁴. This confusion may result from the oversimplification of the “zero tolerance” discourse, which is conflated with “obligation to report”, whereas, unlike SEA, sexual harassment does not carry mandatory reporting requirements. Note that, prior to pursuing the option of opening a formal complaint, there are options that the victim could have preferred. For example, the victim could have opted, for senior management’s intervention or for informal mediation by the Office of Ombudsperson. Interviews have revealed that available options for addressing sexual harassment, and implications of choosing one avenue or another, are either largely unknown or unclear to staff at all levels of the organization, including those who should be raising awareness of IOM staff about these.

Moreover, formalized protocols that spell out how the victim will be protected while the investigation is underway when the alleged abuser remains in the workplace are lacking (also for SEA, considering risks to beneficiaries when the alleged abuser continues to interact with affected populations). A discussion involving key concerned IOM units in HQ (the PSEAH unit, DHR, LEG, OIG, ECO, and the Office of Staff Security) is urgently needed to reach consensus on: a) who needs to know what and under which circumstances (e.g.: CoM, DHR, in-country Security Manager, PSEA Focal Point/Officer, etc.); b) how measures implemented to protect the victim will ensure confidentiality, and minimize additional risks of shame and stigma for both the victim and the alleged abuser as the investigation unfolds and upon its completion.

Reporting

Since the launch of the WAAI platform, the goal of streamlining reporting channels to address confusion among staff has been largely achieved. Key informants unanimously recognize that there is a good level of awareness among IOM staff of IOM channels for reporting sexual misconduct, including sexual abuse, and harassment.

However, as with similar misconduct reporting platforms used by peer organizations, for example, Navex which is used by WFP, WAAI works well as a staff reporting mechanism, especially for sexual harassment, but is largely unsuitable for communities or the affected populations to use due to awareness, technology and language barriers, among other issues. This challenge is compounded when missions’ own CFMs are not informed by the needs and preferences of communities, including those most at risk of SEA (i.e.; women, girls, unaccompanied and separated children, etc.).

⁴⁴ Upon receiving this complaint, OIG will communicate with the complainant to provide information about the process, options and victim support services.

While communities may use WAAI if accessible to them, the overall assumption is that when SEA allegations are disclosed through the local CFM or other alternative entry points, a trained staff will act as an intermediary for the reporting process on behalf of the complainant and transfer the information to WAAI. However, as noted earlier, practical guidance on how to safely and ethically transfer SEA information from CFMs to WAAI, that is adapted to the needs and capacities of different IOM missions, is missing.

At the development stage, the main concern guiding the design of the WAAI reporting form were to minimize the risk of re-traumatizing victims and remove reporting barriers (e.g.: request the victim to fill out an extensive questionnaire, ask detailed questions, etc.). The form is therefore very concise and contains mostly open-ended questions. While these initial considerations are valid and remain critical from a victim-centered approach standpoint, evidence suggests that the current design does not facilitate the collection of all data points necessary to expedite the investigation process (and the provision of victim assistance, as will be discussed further on in the report). This creates a high volume of allegations for OIG to process at intake stage and may require investigators to engage in multiple rounds of exchange with missions, or the victims themselves, to gather additional information to be able to proceed with the initial assessment. In addition to being a burdensome and ineffective process, the need to re-engage victims, often multiple times, for piecing together basic information about the case was reported to be distressing for some victims.

When a SEA report is logged directly into WAAI by any IOM staff member, it is not immediately possible for OIG to know whether the victim has already been referred to assistance; there is no requirement for this information to be provided anywhere in the form when it is filled. While in some missions the report is completed by a staff member trained on SEA complaints handling, including on victim assistance, this is not always the case, as not all IOM missions have this capacity or resource in place (most usually a PSEA Focal Point/Officer). For missions that do have this expertise, there is no formal, institutional directive demanding that this staff be informed about the allegation to ensure the victim is referred to services. The protocol to be followed is decided by each mission on a case-by-case basis. Furthermore, interviews have revealed pervasive belief among many IOM staff that sharing information about a case with anyone other than OIG, including the PSEA Focal Point/Officer, would be a breach of confidentiality and could provide grounds for misconduct charges.

These weaknesses critically undermine IOM's capacity to effectively, consistently and timely refer SEA victims to assistance at the point of reporting and subsequently during the complaints handling stage, upon victim's needs and priorities.

Internal Justice

Recently, OIG has increased its capacity to move forward with investigations into cases of sexual misconduct in a more agile manner; backlog overload at intake stage has been reduced and time taken to deliver investigation reports to LEG for follow-up decisions on disciplinary measures has decreased.

Donors have praised OIG's transparency in briefing sessions, a level of transparency which they view as uncommon amongst UN agencies.

In contrast, internal key informants from various departments, and at all levels of the Organization, have unanimously expressed difficulties engaging with OIG and understanding its internal processes and systems, which they perceive as rather obscure – OIG was often compared to a “black box”. While they acknowledge that OIG must strictly abide by principles of confidentiality and independence, they mentioned that their information requests were not about specific cases or issues that would lead to breaches of confidentiality. For example, key informants highlighted their needs to better understand estimate timelines for milestones to be reached in the investigation process⁴⁵ and how OIG's processes work in areas of common interest where their efforts intersect with OIG's, such as victim protection and referral to assistance services, so they are able to advise staff and victims accordingly and build trust with victims and affected populations. Consequently, many key informants from within IOM have reported that progress in critical areas of their own work has stalled due to lack of clarity from OIG.

Although, to a certain extent, issues such as the duration of an investigation, or how victims may be best protected during an investigation are case specific, the lack of standardized, clearly articulated investigations SOPs for cases of sexual misconduct, that OIG could rely on to explain to others about its systems and processes (approaches, timelines, procedures, etc.) are compounding these challenges. OIG has a system of internal templates and SOPs which it is currently expanding and, as part of this expansion, a specific SOPs on SEA investigations is being drafted. It will address, among other issues, how to engage with PSEA Focal Points at mission-level, the methodology applied for investigations within a survivor-centered and trauma-informed approach⁴⁶, etc. The drafting of this document provides a major opportunity for promoting collaboration and clarifying and resolving key issues among SEAH-relevant teams in HQ within efforts to strengthen internal coherence. Furthermore, communicating such SOPs to key PSEAH-relevant entities and wider stakeholders would not compromise OIG's independence nor undermine confidentiality of specific cases, but rather, help to build trust and confidence within the Organization on IOM's ability to handle sexual misconduct complaints in a standardized and victim-centered manner.

Lastly, the Organization should also re-examine whether it is possible to change subscription to another tribunal, other than ILO's Administrative Tribunal, in an attempt to lower the thresholds of burden of

⁴⁵ While timeline may vary depending on the priority and complexity of each case, several UN entities have established timelines for major steps in their investigation processes to be completed. WFP, for example, has established timelines for investigators to confirm that the victim has been referred to services and then perform the necessary follow-ups to link survivors to assistance.

⁴⁶ "Trauma-informed approaches are evidence-based and build on more than 30 years of research that help us to understand ways of interacting with a survivor that can contribute to, rather than detract from, their healing and recovery. The objective is to examine policies, procedures and practices and identify how they may negatively impact people who have experienced trauma". [Post-#aidtoo: are we setting ourselves up to fail? Hannah Clare and Carolyn Bys, page 33. Humanitarian Exchange, Issue 81 June 2022, Humanitarian Practice Network \(HPN\) at ODI.](#)

proof and ensure these are appropriate given the specific nature of sexual misconduct. This would certainly contribute to making IOM's internal justice system more victim-centered⁴⁷, likely countering the perception that the burden of proof works as an enabler of impunity, and ultimately encouraging more victims to come forward and report.

Victim-Centered Approach

The absence of a victim-centered approach framework is probably the most critical institutional gap presently facing IOM. Its implications are far reaching, detracting from overall system effectiveness. This gap is cross-cutting, requiring commitment and buy in from all entities and sectors within IOM, not just the PSEAH Unit.

Institutionally, there is no common understanding of what a victim-centered comprehensive approach means and entails for IOM, including on the rationale of adopting a victim-centered approach, on how the organization is operationalizing survivor-centered and trauma-centered guiding principles to PSEAH, and, more critically, no clarity mechanisms, as well as roles and responsibilities when it comes to ensuring protection and safety of SEAH victims and that appropriate, safe, timely and accessible quality assistance services are available to SEAH victims.

Adopting a comprehensive victim-centered approach means putting SEAH victims at the cornerstone of IOM's vision. It goes beyond provision of victim assistance, it also includes the need to promote and establish safe, accessible and appropriate reporting channels for affected populations that are fully fit to handle SEA (see prior analysis under "Relevance" and related points under "Reporting"), as well as strengthening procedures for safe and ethical information sharing of updates and milestones throughout the investigation process.

Hurdles inherent to the structure of IOM's current complaints handling process hamper effective implementation of a victim-centered approach. When WAAI or OIG's email are the *direct* entry points for the report, without the use of any other alternate entry point, then OIG is the *only* unit in position to confirm if the victim has already been referred to assistance and, otherwise, perform follow-up referrals. Although the PSEAH unit, Protection, GBV and Child Protection teams in HQ, and some mission-level PSEA Focal Points, have confirmed that they occasionally (albeit inconsistently) receive referral requests from OIG, it is visible that the process unfolds in an ad hoc, non-structured manner⁴⁸. It is not possible to ascertain which standards are applied, including which format OIG uses to refer cases, at which point

⁴⁷ For reference on how other organizations have structured their investigation processes, including standards and thresholds applied to sexual misconduct cases, please refer to the benchmarking matrix in Annex A. For example, the World Bank refers to "verification", but refrains from using the term "investigation"; their administrative process is centered around establishing facts linked to four fundamental data points in order to proceed with any potential disciplinary measures, these are: type of sexual misconduct, age and gender of the victim, relationship between alleged perpetrator and the World-Bank funded project, and whether referral to services have already taken place.

⁴⁸ Note that allegations received by OIG which are found not to be actual cases of SEA but cases of GBV are also referred to the relevant teams, which stands as a good practice.

during investigations this is done, and how OIG prioritizes who it will liaise with when investigators uncover that victims have not yet been linked to services. In other agencies, for example UNDP, UNFPA and UNICEF etc., there is a requirement for the process to include information being passed immediately to the Country Representative to ensure linkages with victim assistance. An SOP guiding the referral process is vital to facilitate the process and ensure it is implemented in line with GBV guiding principles and a victim-centered approach.

While it is expected that the recently established PSEAH unit will take the lead on the victim-centered approach, there is, formally, no clearly assigned institutional-level accountability for the victim-centered approach, including victim assistance⁴⁹. This creates challenges for missions in structuring their victim assistance referral processes in a way that is consistent with IOM's institutional approach and best practice. Perhaps the most notable example of this void is the requirement of notifying the PSEA Focal Point when a SEA case is received to ensure victims can be safely referred to services, which, as noted earlier, is left at the discretion of each mission.

Box 2 provides a best practice example from the IOM mission in Cox's Bazar, where the reporting and victim assistance referral process supports a victim-centered approach and promotes quality reporting, due to the active involvement of a skilled, technically qualified PSEA Focal Point.

**Box 2 – Best Practice Example
Reporting & Victim Assistance (IOM CXB)**

The IOM mission in Cox's Bazar has established a strong reporting and victim assistance referral mechanism. The office has established a PSEA mailbox, managed by and accessible only to the PSEA Focal Point, who has strong background in Protection/GBV. All SEA allegations received by IOM staff or via the local CFMs are channeled to the PSEA mailbox. The PSEA Focal Point filters through the inbox to check for SEA-related allegations, then transfers the information related to SEA cases to the WAAI platform to be submitted to OIG. The PSEA Focal Point then emails the individual who reported the allegation to confirm that the victim has been referred to services and, if not yet done, follows-up to ensure the victim is linked to services. The use of the PSEA mailbox is not mandatory, reports can be entered directly into the WAAI platform, but it is strongly recommended as it ensures that reports entered into WAAI are done so by a trained staff member. This leads to comprehensive, better-quality data being provided to OIG and allows the PSEA Focal Point to address any potential gaps in referrals to services. It also ensures that confidentiality is maintained all throughout the process.

Overall, capacity to support and refer SEA victims is uneven across regions and missions. Referrals, including to meet immediate, lifesaving needs of SEA victims, tend to happen in a much more coherent, victim-centered and effective manner in IOM missions that have a strong PSEA or Protection/GBV culture, PSEA or Protection/GBV programming, and in-house PSEA, Gender, GBV or Protection

⁴⁹ See related considerations on the establishment of a Survivor Care Officer position within the PSEAH unit, under the "Efficiency" sub-heading.

expertise, as well as strong links with local GBV referral pathways. Note that while PSEA Focal Point TORs have been standardized, it still happens that nominated Focal Points may not have GBV/Protection/SEA background, or that the mission may not have staff with GBV/Protection/SEA background that can be nominated as the PSEA Focal Point.

Another critical gap hindering the holistic, effective implementation of the victim-centered approach is the prevailing perception that there is no consistent, standardized approach to information sharing with SEAH victims during investigations and upon case closure, which damages trust in the process. Updates to victims during the investigation, and on outcome of the case, are usually provided by OIG and LEG, often through the PSEA Focal Point (or other designated staff) and DHRM, respectively. While OIG indicates that, during the investigation, process automatic status updates every three months and also upon request is realistic, information collected during the External Evaluation indicate that this is not happening systematically.

Secondary accounts from victims relayed by key informants revealed that many do not know about the status of their case for several months and some are not informed about the final decision reached by IOM on their case, including the disciplinary measures taken against the abuser (if any). More awareness needs to be raised on the fact that OIG and LEG (upon OIG case closure when the case is transferred to LEG) can provide information to victims and PSEA Focal Points upon request. However, from a victim-centered approach, it is important for OIG and LEG to be more proactive in sharing case status updates and notifying victims of case outcomes, rather than expecting victims to request those updates.

For SEA, the highly mobile nature of IOM's beneficiaries creates its own set of challenges for consistent communication with populations and victims, but creative solutions, fit for the realities of IOM and its mandate, are required to fully deliver on the victim-centered approach.

Lastly, for cases involving sexual harassment, there is no minimum standard for the provision of victim assistance services⁵⁰, including remedies and restorative care during and following the completion of a complaints handling process (this point applies to both victims of SEA and sexual harassment though). Note that different categories of personnel are afforded different guarantees, for example, access to health coverage, legal counseling, etc. Ultimately, the absence of guidance, information and consistent support acts as a deterrent to reporting.

Workforce

As noted previously, there is a need to tighten, and more systematically apply and monitor, TPCs' PSEAH requirements, especially given that missions with a higher proportion of third-party contracted staff are those operating in insecure environments, where SEA and sexual harassment risks are exacerbated due

⁵⁰ The IASC is looking to develop guidance on these standards this under its 2022-2026 PSEAH workplan. IOM should be encouraged to support this inter-agency effort to ensure that quality, collectively agreed standards are institutionalized.

to increased vulnerabilities. At present, there are no requirements for any IOM partners or service providers on sexual harassment. This is at odds with UN-system model policy and practices of other UN entities. This gap cannot be addressed through the revision of the PSEA Policy, rather the standard PSEA contract clause should be expanded to address sexual harassment.

One of the major advantages of engaging TPC staff is that these personnel can deploy faster particularly within complex environments, which makes them particularly attractive for missions looking to quickly ramp up human and technical capacities, for example, in the event of a sudden onset emergency or where there are security challenges. TPC representatives note that it can be sometimes difficult to balance the expectation that TPC staff will be rapidly deployed and the need to properly induct the new staff during onboarding, including by providing them with a proper briefing on PSEAH. Other challenges identified were that TPCs have currently no access to UN ClearCheck and are not systematically using PSEA training materials tailored to the realities of IOM. For TPCs contracting local staff to IOM, usually administrative and security personnel, another issue highlighted was the lack of training materials available in local languages and tailored to the profile of the targeted audience group (e.g.: include context and culturally sensitive, practical examples, etc.)⁵¹.

The most significant gap raised by these informants was the need to expand staffing or enhance technical capacity of their own investigations teams to ensure their processes are on par with IOM's standards, including the victim-centered approach. This is critical to guarantee that the same levels of accountability can be maintained across all IOM workforce categories.

Currently, there are minimal or virtually no PSEA requirements in place for hourly non-staff personnel and volunteers. In principle, daily workers are required to undertake PSEA training, however, compliance monitoring for this staff category tends to be weak. For volunteers, vetting systems would be helpful in supporting risk mitigation, but uncommon within most operations.

4c. What measures can be put in place to mitigate SEAH risks from organizational and programmatic standpoints?

The IOM PSEAH Toolkit and Checklist serves as an important starting point for identifying suitable measures that can be put in place to support safer programming and risk mitigation from an organizational and programmatic standpoint. This comprehensive resource outlines clear actions, across nine priority areas⁵², that should be implemented within IOM offices and programmes to strengthen

⁵¹ This will be addressed by the forthcoming "Together We Say No" campaign with WFP and Translators without Borders which will be available in 27 languages targeting frontline workers who are in direct contact with affected populations with simple PSEA messaging through audio and visual communications.

⁵² These are, internally: IOM PSEAH Office/Programme Leadership; IOM Human Resources (linked to PSEAH), Building PSEAH Capacity of IOM Staff and Related Personnel; Reporting Incidents of Sexual Misconduct within IOM; Embedding PSEA within IOM Programme/Project Cycle: Proposal, Development/Budgeting, Programme/Project Implementation

prevention and response efforts on SEA and SH, mitigate SEA risks, and provides detailed guidance on how these should be implemented. These include, for example, concrete recommendations on human and financial requirements to be integrated within offices and programmes to effectively mitigate SEA risks and support SEAH response. The Toolkit also offers indicators, or so-called “markers”, that offices and programmes can use to periodically monitor progress of their PSEAH strengthening and SEA risk mitigation efforts.

Additionally, the SEA Risk Analysis Framework that will be submitted as a second deliverable of this External Evaluation will address this question in detail and support IOM in moving forward with the implementation of risk-informed approach to PSEA within programmes and operations, including by looking at human and financial resources as organizational measures to mitigate SEAH risks. Note that the risk-informed approach will ensure all IOM programmes and operations, even those considered low-risk, implement at least minimum standards of PSEA and have required human and financial resource requirements in place to effectively advance PSEA.

To ensure that the SEA Risk Analysis Framework offers sound evidence to ground decision-making, including on PSEA technical, financial and human resource allocation, as well as on risk mitigation measures, the approach will rely on two layers of analysis. A level-one analysis will cover contextual, operational, programmatic risks, and capacity of operations to prevent and respond to SEA. This first-level analysis should be coupled with an IOM programmatic area’s risk assessment⁵³.

4d. How can IOM prioritize SEA risks going forward?

The SEA Risk Analysis Framework should cover aspects related to the context where IOM operates including, for example, type of setting (fragile/conflict, stable), size, composition and level of mobility of displaced populations; gender social norms indicators (e.g.: around key issues related to acceptance of violence, particularly towards children, women, and LGBT+ individuals); prevalence of GBV; GBV prevention and response frameworks; GBV legal framework; human trafficking prevention and response frameworks etc. In addition, a complementary dimension to consider should include indicators of the level and type of contact maintained with affected populations and communities (i.e., programmes focusing on advocacy and policy work versus those delivering direct services to affected populations); IOM operations’ scale, specific areas programming, and implementing modalities (direct/indirect, i.e., reliance on implementing partners); proportion of IP assessed for PSEA capacities and supported to build

and M&E. And, externally: Working with Implementing Partners, Government Partners, and Other Service Providers; Communicating and Increasing Awareness on PSEA within Communities and amongst Migrants and Beneficiaries; Establishing and Strengthening Complaints and Feedback Channels (within communities, projects, and programmes); Ensuring Access to Quality Victim Assistance.

⁵³*The World Bank risk framework is very robust and can be used as a source of inspiration; it employs two layers of analysis to reach final results and inform the development of the risk mitigation plan for each World Bank funded project.*

PSEA capacities; workforce gender composition and categories (TPCs, volunteers, daily workers, hourly non-staff personnel), etc.

The SEA Risk Analysis Framework should also incorporate indicators related to the degree of preparedness of IOM operations to prevent and respond to SEAH, for example, whether there are dedicated PSEA Focal Points/Officers with relevant technical expertise in place; whether there is a PSEAH (budgeted) Action Plan with clearly assigned responsibilities; whether PSEA is systematically embedded in programming and budgeted for accordingly; whether a reporting system in place that is safe and accessible for affected communities and beneficiaries to use and is fit to handle SEA and further links reports to WAAI; whether a victim assistance referral pathways and SOPs is in place (including funding, security plan and collaboration with Protection/GBV and Child Protection actors and providers of last resort where services are not available), etc.

The SEA Risk Analysis Framework that will be submitted as a second deliverable of this evaluation will address this question in detail and support IOM in moving forward with the implementation of a risk-informed approach to PSEA within programmes and operations, including guidance to identify and prioritize SEAH risks and develop appropriate mitigation strategies. Note that the risk-informed approach will ensure all IOM programmes and operations, even those considered low-risk, implement at least minimum standards of PSEA and have required human and financial resource requirements in place to effectively advance PSEA.

For sexual harassment, risk prioritization should consider indicators such as the number of staff (and gender ratio) signing Codes of conduct with clear language on sexual harassment prohibition in the workplace, and linkages to safe and ethical reporting channels and mechanisms; the existence and implementation of protocols for protection of whistleblowers and protection from retaliation, as well as elements such as personnel gender composition, the proximity of male and female co-workers with limited safeguards, number and gender of staff working in remote, hard to reach, locations, etc.

5. EFFICIENCY

5a. To what extent does IOM have adequate structures, human and financial resources for efficient PSEAH actions (at country, regional, programmatic and global level)?

PSEAH Resourcing & Technical Expertise - Global Level

The PSEAH unit in HQ is comprised of three staff, including the PSEAH Senior Coordinator. As observed earlier, despite significant accomplishments to strengthen PSEAH efforts globally in such a short period of time, the current staffing levels are clearly not sufficient to meet the demands of such a large, far-stretching, diverse and operational organization as IOM, especially considering that the Unit is tasked with both PSEAH policy work and operational delivery of the PSEAH strategy, as well as active participation, liaison, and expected outputs within the IASC and UN systems. While staff have strong

background in Protection, GBV and gender-related fields, presently, technical and human capacity are not sufficient to represent and advocate for victims within the Organization, including during investigations and in policy discussions. The team's cadre of technical expertise and political clout would be greatly enhanced with the establishment of a senior-level Survivor Care Officer (SCO) within IOM's PSEAH Unit who will be responsible for putting SEAH victims' rights and dignity first. Suggested roles and responsibilities of the SCO are detailed in Box 3 below. In addition, the Evaluation also identified the lack of secure funding for PSEAH global staff and for activities as pressing gaps to be urgently addressed.

**Box 3 – Survivor Care Officer
Suggested Roles and Responsibilities**

It is envisaged that the SCO will be part of the PSEAH unit and will work in collaboration with all PSEAH relevant units at HQ-levels (Office of the Ombudsperson, DHR, OIG, ECO and Office of Staff Security), and in coordination with IOM's operations and missions. *The list below is not exhaustive.*

1. **Provide case management services** to complainants of sexual misconduct including psychological support and provision of guidance in relations to procedures for complaints and options available for referral to adequate services.
2. Lead the development of **IOM Victim-Centered Approach policy**, including IOM definition of the victim-centered approach for adult and children survivors, rationale and guiding principles, roles and responsibilities, collaboration/coordination with IOM internal PSEAH relevant units, and external groups (e.g., inter-agency PSEAH and GBV fora).
3. Develop **key pillars of IOM's victim-centered framework**, including:
 - Protection and safety of SEAH victims
 - Safe, timely and accessible quality assistance and services available to victims through SOPs guiding referral processes
 - Timely and accessible information available to SEAH victims on their rights and on how these are upheld throughout the complaints handling process
 - Safe and ethical information sharing of updates and milestones with victims throughout the investigation process (inc. on the investigation outcomes and possible next steps for SEAH victims)

- Safe and ethical information sharing of aggregated data on SEAH cases with the aim to enhance IOM's risks and trends analysis capacity
 - IOM personnel awareness raising and capacity strengthening on the victim-centered approach
 - Victim-centered approach accountability for IPs, TPC and service providers
 - Advocacy in support of the victim-centered approach in international, regional, and national fora.
4. Provide **technical assistance to the operationalization of the victim-centered approach** within IOM, in line with good practices and standards including:
 - Timely support for safe, timely and accessible information on SEAH victims' rights tailored to communities' preferences and needs (e.g., consider various communication tools and modalities to accommodate various groups)
 - Guide the consultation and community participation processes so that prevention and support to SEAH victims needs and priorities are responsive to beneficiaries' needs and priorities (e.g., systematically consult women and girls and other community groups at risks of greater exposure to SEA to hear their preferences for complaints reporting channels and handling)
 - Act as a liaison/facilitate referral of adults and children's SEAH victims – directed from OIG to the PSEAH units - to timely and appropriate assistance and services in IOM operations
 - Support and facilitate safe and confidential information sharing on cases' handling with victims, taking into consideration their preferences
 5. Provide **technical assistance to the operationalization of IOM victim-centered approach** with IOM's TPCs, IPs and service providers, including by supporting the Organization in ensuring its partners and contractors fulfil their obligations vis-à-vis SEAH victims (e.g.: training and capacity strengthening)
 6. Engage and contribute to **advocacy efforts and initiatives aimed at putting SEAH victims' rights and dignity first** within the UN, but also with member states, governments, and civil Society.

The OIG team of investigators is gender balanced; staff has diverse background and training in SEAH-relevant areas, but size, gender, language composition and areas of expertise are insufficient to meet the specific demands of investigations of cases involving sexual misconduct. Concentration at HQ-level hinders agile deployment to the field. Mission-level informants indicated that ad-hoc requests for support from staff within IOM missions are not uncommon, for example, for providing translation during investigations, which may have significant security implications for staff and compromises ethics. It also presents a conflict of interest to IOM PSEA Focal Points or any staff providing support to victims when these are mobilized to assist with the practical aspects of an investigation⁵⁴. As due diligence is a central principle guiding OIG's investigation standards, more efficient resourcing of OIG's functions to lessen reliance on mission staff specifically during investigations is therefore critical.

IOM's LEG team is lean; while there is no specific staff member assigned to work exclusively on SEAH issues, most staff members have expertise in handling disciplinary measures. LEG not only advises on disciplinary cases and measures, but also drafts and advises on contractual clauses on PSEAH to be included in agreements with service providers, TPC and IPs; as well discrete legal issues referred to LEG by OIG arising out of specific SEAH cases. As SEAH processes and disciplinary measures must be fast tracked, and LEG is also expected to play a key role in PSEAH policy discussions to advise on legal

⁵⁴ Provision of logistical support during field missions do not create issues, however, other types of support, for example, translation of forensics documents, real-time translation during investigations, etc. present problems.

matters, it is important to evaluate whether an increase in current staffing levels would be necessary to more efficiently support these processes.

IOM’s Staff Welfare plays a key role in sexual harassment. IOM’s counselors have sound technical background in SEAH-related areas, including trauma, diverse language skills and are geographically spread to cover all regions of IOM operations. However, most counselors are under precarious, short-term contract arrangements⁵⁵, which leads to high levels of staff turnover and creates challenges for ensuring sustainability and effective trust-building with staff, especially victims.

The Office of the Ombudsperson has started to decentralize, but currently only has two staff stationed in regions. This is a major limitation given that the type of services it offers work more effectively when there is physical presence. According to the Office of the Ombudsperson, physical presence also leads to a take-up in services.

IOM’s ECO has one specialist trained in retaliation. While it is not immediately possible to know whether this is sufficient, the evaluation identified that more proactive engagement of ECO is necessary to support development of practical guidance on issues related to prevention of retaliation, including interim measures that can be in place to reduce risks to victims during investigations.

Lastly, IOM’s DHR in HQ seems to be under-resourced, especially considering requirements related to mandatory completion of UN ClearCheck verification for all staff during the recruitment process. However, it is important to highlight that UN ClearCheck procedures have been already decentralized, with mission-level HR staff now performing checks for their own recruitments.

PSEAH Resourcing & Expertise - Field Level

The nomination of PSEA Focal Points within all IOM’s ROs and COs is a critical step in the process of strengthening IOM’s PSEAH approach. While recognizing that certain operational contexts and programmes require dedicated PSEA technical resources, this is intended as an immediate, interim, no-cost measure to work towards meeting minimum standards on PSEA. Table 3 below details the number of PSEA human resources at the field level, either as dedicated IOM or interagency PSEA staff (primarily 100%) or IOM Focal Points (10%) and are: a) in place prior to April 2022; b) recently onboarded (as of April 2022); and c) proposed or planned (by December 2022).

Table 3 – OVERVIEW OF <u>FIELD-LEVEL</u> PSEA HUMAN RESOURCES⁵⁶	
A. PSEA staffing in place within IOM before April 2022	Number of Staff
IOM dedicated PSEA field staff (full-time) in place before April 2022	0

⁵⁵ Many are resourced through the United Nations Volunteers Programme (UNV) or contracted as consultants.

⁵⁶ For further details on the number of dedicated staff per category, geographic allocation and funding sources, please refer to Annex B.

IOM part-time PSEA field staff (50% time) ⁵⁷ in place before April 2022	0.50 (>1)
Inter-agency PSEA field staff, in place before April 2022	6
IOM Regional Office PSEA Focal Points	20
IOM Country Office PSEA Focal Points	0
PSEA Field Staff (in place prior to April 2022): TOTAL	6.5 PSEA staff
B. PSEA staffing recently onboarded (April and August 2022)	Number of Staff
IOM dedicated field PSEA staff (full-time), recruited as of April 2022	10
Inter-agency PSEA field staff, recruited as of April 2022	1
Recently onboarded: TOTAL	11 PSEA staff
C. New PSEA staffing (to be in place by December 2022)	Number of Staff
IOM dedicated field PSEA staff (full-time), in place by 31 Dec 2022	38
IOM Country Office PSEA Focal Points	tbd
New PSEA Field Staff planned: TOTAL	38 PSEA staff
TOTAL	55.5 PSEA field staff
	20 RO PSEA FPs
	(# tbd) CO PSEA FPs⁵⁸

By the end of 2022, IOM will have 55.5 PSEA field staff in place, across 39 countries⁵⁹, 20 RO PSEA Focal Points covering all nine IOM regions, and at least one CO PSEA Focal Point in each of the IOM country offices.

Another positive development has been the development and launch of standard TORs for dedicated PSEA positions, issued in late 2021 by the PSEAH Unit in coordination with DHRM, to formalize responsibilities of PSEA officers at a range of grade levels, as well as standard ToRs for PSEA CO and RO Focal Points. This is also part of wider efforts to encourage more deliberate, conscientious appointments by CoMs to ensure that staff appointed to serve as PSEA Focal Points are fit for the requirements of the role and that management allows them the necessary time and resources to complete their tasks.

Note that the dedicated PSEA Officers or Focal Point TORs do not include responsibilities related to sexual harassment⁶⁰, hence, there is a risk that a void will be left if these responsibilities are not properly assigned within IOM RO and CO. A discussion between the PSEAH Unit and the Office of the

⁵⁷ These are staff who have PSEA responsibilities formalized in their job title.

⁵⁸ As recognized by PSEAH unit in HQ and formalized as of late 2021 with the launch of official PSEA FP TORs, nominations are still trickling in for missions, the total number still unconfirmed for COs; ideally there will be at least one Focal Point in each mission by end of 2022.

⁵⁹ Not including HQ and NY-based staff.

⁶⁰ The reason the additional responsibility of sexual harassment was not included in the PSEA Focal Point ToRs is three-fold: a) PSEA Focal Points undertake this role on top of their main job responsibilities; covering both SEA and SH would place an additional burden on an already overstretched staff member; b) the issue of addressing sexual harassment within the workplace requires a certain skill set such as a background in conflict mediation, counselling and/or mental health; and c) IOM already has trained Respectful Work Environment Focal Points who can provide support and assistance to address sexual harassment.

Ombudsperson is necessary to address potential gaps on roles and responsibilities on issues related to sexual harassment, especially considering potential synergies with the efforts of CO Respectful Work Environment Focal Points working under the Office of the Ombudsperson, understanding that, as noted earlier, Respectful Work Environment Focal Points cannot be involved in reporting.

Currently, and because the vast majority of IOM operations still do not have dedicated PSEA capacity, most PSEA Focal Points are double hatting⁶¹. PSEA is a voluntary commitment, additional to their regular responsibilities. Several are human resources administrative or resource management staff and do not have a background in PSEA, GBV, Protection and gender (despite this being criteria for nomination), which leads to challenges in implementing a victim-centered approach to PSEA within IOM operations, in particular on aspects related to victim assistance, as extensively explained earlier in the report.

In some contexts, for example, in Cox's Bazar and Iraq, PSEA Focal Points are also Protection or GBV programme staff, funded through Protection/GBV projects. While it is important to highlight that individuals serving in the PSEA role must have technical profile in relevant areas, as it ensures missions are better equipped to deliver on a victim-centered approach, this may reinforce the perception that PSEA functions should be supported, both technically and financially, by Protection sector programmes and projects, undermining a sense of shared ownership and accountability across the entire operation. The funding discussion is addressed in more detail under "Sustainability"; for a best practice example on how PSEA can be prioritized as a cross-cutting function within IOM operations, and resourced accordingly, please refer to Box 4.

Box 4– Best Practice Example: PSEAH Resourcing (IOM Greece)

Within IOM Greece, PSEAH is fully mainstreamed in the mission's resourcing strategy, as there is strong senior leadership commitment to PSEAH. The staff member currently designated to lead on PSEAH is funded through pooled resources also used to fund other critical staff within the office, such as the CoM. This gives PSEA visibility and a good degree of political clout, which helps to advance PSEA integration into wider operations and programming.

Technical Guidance & Capacity Building

Translation of PSEAH guidance and technical resources was highlighted by PSEA Focal Points as a pressing need, given that the majority of them are currently only available in English. An induction package and training for PSEA Focal Points that would enable them to understand the requirements of the role and equip them to deliver on their responsibilities should also be expedited. With the launch of the IOM PSEAH Toolkit and Checklist in September 2022, it is important to ensure other key stakeholders, who are also accountable for PSEAH within offices, especially CoMs⁶², also receive

⁶¹ Some staff are both the PSEA Focal Point and the Gender Focal Point which represents a massive commitment, i.e. 20% additional work on top of their regular job responsibilities.

⁶² Within the CoM training delivered to new CoMs, the PSEAH team is given a 30 min - 1 hour slot to deliver PSEAH accountability and responsibly messages amongst other areas of their work which are linked to PSEAH. The PSEA Unit

audience-targeted training on PSEAH to move forward on their responsibilities. Capacity development should also target Project Managers, Project Development Officers, Crisis Coordinators etc. with the aim of creating a culture of PSEA integration within programmes, projects and operations.

6. IMPACT

6a. What impact, if any, does IOM's approach to PSEAH have on shifting organizational culture, behaviour and attitudes to create an environment that protects from SEAH?

Globally, the absence of a theory of change and a corresponding results framework underpinning IOM's PSEAH approach has hindered an in-depth analysis of "Impact". Dimensions of inquiry were introduced by the External Evaluation, at the methodology development stage, in an attempt to address this limitation and direct the analysis.

As a result of its efforts on staff awareness, including mandatory PSEA training, senior management consistent messaging on PSEAH⁶³, IOM has made significant strides in creating an environment where staff acknowledges and understands the Organization's stance on the "Zero Tolerance" policy on SEAH. In addition, there is the feeling that the establishment of the WAAI platform, offering an anonymous and confidential avenue for reporting, coupled on awareness on IOM's reporting channels has contributed to an increase in the number of reports of cases of sexual misconduct⁶⁴. However, considering potential higher reputational risks and significant steps achieved in its fight against ending impunity for SEA, sexual harassment efforts are overshadowed by strong prioritization of SEA within the Organization.

IOM has made and continues to make noticeable progress on defining and structuring its approach to PSEAH. Improvements have accelerated over the past year with the creation of the PSEAH Senior Coordinator role, supported by a technically qualified, dedicated, albeit small unit. While recognizing these efforts and their positive impact, the External Evaluation has identified critical systemic gaps that undermine the Organization's capacity to promote meaningful impact on shifting organizational culture, behavior and attitudes to create an environment that fully protects from SEAH.

As noted throughout the report, several challenges are affecting IOM's ability to deliver on its commitment to SEAH, including gaps in internal coherence and the need to better articulate and operationalize IOM's institutional vision, principles and values driving its response to SEAH, especially from within a victim-centered perspective (see detailed analysis in sections on "Relevance", "Internal Coherence" and "Effectiveness").

has also created a small module within the Emergency Response Induction Training (ERIT) capacity-building for future surge staff.

⁶³ For example, the PSEA Unit relies heavily on staff advisories and is invited to present in high-level HQ and RO meetings. They are also asked to contribute to donor meetings (talking points), etc.

⁶⁴ Note that this is based on anecdotal evidence, as it was not possible to obtain data on reporting trends (for a detailed discussion on data, please refer to question 6.b)

Globally, IOM's approach to SEAH has historically been driven by a strong focus on reporting and complaints handling, which has worked to the detriment of a victim-centered approach and eroded trust in the system. Recently, efforts have been invested in rebalancing the focus to infuse a more victim-centered approach into prevention, capacity strengthening and awareness raising efforts. Primary examples are IOM's position on sharing personal data without the consent of the survivor; building consensus for the abolition of the child marriage exception in the revised PSEA policy; resources allocated for capacitating general personnel (non-specialists) on how to respond to SEA disclosures; and a focus on the perspective of the survivor in mandatory training materials with emphasis on behaviour change learning. The development and the subsequent roll out of a communication campaign on the prevention of sexual harassment in IOM is another example of how the Organization is furthering these efforts.

Nonetheless, lack of strategic communication that is able to clearly articulate to staff, beneficiaries and victims how IOM handles received complaints, including how individuals that come forward to report will be protected from potential risks and retaliation, remedies available to victims and outcomes of cases (i.e.: appropriate and proportionate sanctions taken against proven perpetrators), affects trust in the system by reinforcing the perception that mechanisms and processes are not fully transparent⁶⁵. Consequently, a perceived culture of impunity of perpetrators, that may or may not be based on actual facts, largely prevails.

While important steps have been achieved in creating awareness among staff on acceptable behaviour and code of conduct, impact on shifting Organizational culture, behaviour and attitudes to create an environment that protects from SEAH has not been yet achieved. IOM must continue investing in identifying, exploring and piloting approaches that recognize the universal and systemic nature of SEAH, unpack the root causes of these types of misconduct, including structural links with harmful gender social norms that perpetuate GBV, as described above, and learn from SEAH trends and patterns, including those related to barriers to reporting⁶⁶, to eventually challenge and commit to addressing unconscious bias and power dynamics as key drivers of sexual misconduct within the aid sector⁶⁷.

6b. How can IOM foster continuous learning and improvement, and strengthen accountability on PSEAH?

⁶⁵ For reference on how data on disciplinary measures can be used strategically to foster transparency and build trust in the system, please refer to Annex C and to [WHO's Dashboard into Sexual Misconduct Investigations](#).

⁶⁶ Please consult : [Policy paper, Sexual Exploitation, Abuse and Harassment in the international aid sector: victim and survivor voices: main findings from a DFID-led listening exercise, 2018. Department for International Development, Foreign, Commonwealth and Development office.](#)

⁶⁷ Please see examples of initiatives that have enabled UNHCR staff to speak up in an anonymous way about their experiences of sexual misconduct, and learn from the "Women and Change" and "Men for Change" staff groups that have provided avenues for staff to discuss about these topics. [UNHCR's journey towards a victim-centered approach, Diane Goodman, Blanche Tax and Zuhura Mahamed, page 67. Humanitarian Exchange, Issue 81 June 2022, Humanitarian Practice Network \(HPN\) at ODI.](#)

Gaps identified in internal coherence hamper staffs' understanding of IOM's PSEAH vision, guiding principles, objectives and processes underscoring its efforts to prevent and respond to SEAH. IOM can foster continuous learning and improvement by better articulating and communicating its vision, policies and institutional frameworks, as well as roles, responsibilities and expected PSEAH accountabilities (at staff and organization levels).

Efforts and results to prevent SEAH and protect individuals from SEAH across IOM operations are not timely and sufficiently monitored or disseminated, particularly within the Organization. As explained above, these gaps critically undermine trust in the system due to the general belief that reporting abuses does not necessarily lead to follow-up, corrective action. More specifically, many key informants expressed frustration over the fact that once the report is submitted into the WAAI platform, outcomes are not known⁶⁸. On aspects related to case updates, the feedback loop gap can be addressed by better communicating to staff about the complaints handling process and that, while complainants who are not aggrieved individuals or subjects are not entitled to information about the investigation, any party with a need to know (e.g., a CoM or PSEA Focal Point) who would like to receive a status update about a case during the investigation or disciplinary process, can write directly to OIG, LEG or DHR to request information.

The Organization should also do better at communicating disciplinary actions taken against offenders more widely and through powerful messaging, which can be done in a way that respects confidentiality and upholds survivor-centered principles. The Executive Office Report and IB/82 ("Measures taken by the Director General in cases of Misconduct") are meant to be released on a yearly basis, but this has not happened with the agreed frequency and there is insufficient attention paid to SEA and SH. Furthermore, these materials are not packaged as strategic communication pieces aimed at fostering trust in the system and changing behaviour. For examples of how communication can enhance transparency and be leveraged in support of efforts to counter widespread perceptions of impunity, please refer to Annex C and to WHO's [Dashboard into Sexual Misconduct Investigations](#).

Furthermore, the Evaluation also faced difficulties obtaining quality, comprehensive and relevant data to assess and evaluate IOM's PSEAH achievements from an institution-wide point of view. This includes, for example, trends on types and number of cases reported, status and outcomes of investigations in relation to number of cases received, victims' protection, access to victim assistance services, victims' feedback on the way their cases were handled, etc. Tracking and monitoring tools are often siloed, with different indicators being used by the various PSEAH-relevant units, policy areas and sectors (e.g.: Protection, GBV-CP, LEG, OIG), thus, they can only provide a fragmented picture of IOM's efforts, limiting a comprehensive understanding of system-wide performance or aggregate impact. In the

⁶⁸ Note that complainants who are not aggrieved individuals or subjects are not entitled to information about the investigation.

absence of a collective, institution wide PSEAH results framework (and indicators), it is challenging to ascertain whether IOM is achieving its intended objectives on PSEAH.

Additionally, an internal feedback loop system that would enable IOM to learn for specific cases to better understand outcomes of measures in place to prevent and protect beneficiaries from SEA would be helpful to inform approaches to strengthen and reinforce risk mitigation measures. Even cases closed due to a lack of evidence or other reasons may have valuable lessons learned to integrate into future efforts.

By establishing a better foundation for its PSEAH approach that includes, for example, a theory of change, and more effective use of monitoring, evaluation (M&E) and learning functions, IOM can foster continuous learning and improvement, and strengthen accountability on PSEAH.

Finally, IOM should also carefully examine what “impact” means for PSEAH. This may entail revisiting the notion that accountability can only be achieved through investigations and disciplinary measures and recognizing the centrality of risk-informed organizational practices that promote safe and accountable programming from the onset, thus minimizing the likelihood of SEA happening in the first place.

7. SUSTAINABILITY

7a. To what extent is PSEAH institutionalized in IOM and considered in programming and operational activities?

The development of IOM’S PSEAH Strategy (2021), IOM PSEAH Toolkit and Checklist, revitalization of the IOM PSEAH HQ Task Force, institutionalization of the PSEA Focal Point system and network, and efforts to embed PSEAH in institutional policies, frameworks, processes, such as the IOM’S Strategic Results Framework (SRF), the IOM Global Report, Country and Regional Offices’ Strategies and the IOM yearly Institutional Questionnaire, as well as projects and programmes budgets to fund for dedicated PSEA capacity, represent major achievements in ensuring greater institutionalization of PSEAH within IOM, especially considering that all this has happened within the last year and efforts were mostly driven by a very small PSEAH Unit team in IOM HQ.

These key milestones show that IOM’S efforts to promote PSEAH institutionalization have become more structured and deliberate in an attempt to ensure PSEAH considerations consistently reach all areas of the Organization. Overall, PSEAH institutionalization in programming and operations is largely uneven, likely because past efforts were not systematically informed by a risk-oriented approach (see above under “Relevance” and “Effectiveness”). Programmes, missions and regions where PSEA tends to be more systematically considered in programming and operations are those where there is strong PSEA, Protection, GBV expertise and where there have been significant interagency efforts - namely in humanitarian contexts. For example, IOM’S Department of Operations and Emergencies (DOE) has

maintained a stronger culture of PSEA, as compared to other IOM operational and programming areas, especially due to links with the GBViC IFW.

Recently, targeted and concerted efforts by the DG and both DDGs to ensure PSEA is integrated into project proposals and budgets hold promises for further scaling up the approach across IOM wider programmes and operations, enhancing PSEAH institutionalization within the Organization to bring all programmes and operations to minimum standards (see previously under “Relevance”). Starting with dedicated-PSEA staffing within resettlement and GHAP programming, the goal is to continue to systematically assess risks associated with specific programmes, projects and operations, and then integrate requirements to implement the corresponding risk mitigation actions into project proposals and budgets, including dedicated PSEA expertise⁶⁹. Another example of this effort is within the Ukraine response, which was the first time PSEA was successfully embedded at the onset of a crisis.

At HQ level, departments such as DHRM, LEG and the Office of Staff Security are also moving forward on critical PSEAH issues, including the revision of PSEAH-related policies, UN ClearCheck mandatory requirements and the development of PSEAH guidelines⁷⁰, among others important steps. While these efforts are much welcomed, a few gaps remain that, if bridged, would strengthen institutionalization of PSEAH into programming and operational activities.

Firstly, there are ad hoc lines of communication between the PSEAH unit and the various IOM staff developing, managing and implementing projects, which creates challenges for the transmission of guidance and best practices to ensure PSEA is duly considered in project proposals, budgets, implementation (including links with project’s CFMs), etc. A more consistent, structured method of engagement, possibly via DDG Daniels, would be highly beneficial.

As noted throughout the report, while important progress has been made in the development and implementation of a risk-informed approach⁷¹, the majority of IOM programmes and operations are not systematically utilizing risk assessments to inform their PSEA strategies, either because they do not have tools or capacities to do so, or because the importance of these types of exercises to ground risk mitigation strategies is not fully understood. While this consideration is now reflected in the IOM PSEAH Toolkit and Checklist, it is important to continue to advocate for ground- and project- level, SEA risk assessments, as granular contextual risks are critical to inform locally appropriate PSEA responses, and

⁶⁹ Combined, the USRAP and GHAP will support the total or partial funding of 24 dedicated PSEA positions across IOM offices. For further details, including geographic allocation and other complementary funding sources, please refer to Annex B.

⁷⁰ IOM’s Office of Staff Security is developing a guideline for the Manila Help Desk on responding to cases of sexual harassment.

⁷¹ Most critical milestones include embedding PSEA requirements into the USRAP, the GHAP, the Ukraine response and other project-based resource mobilization strategies, and the risk prioritization framework which will be submitted as a second deliverable of this consultancy.

these will unlikely be captured by the standard indicators of an overarching risk analysis and prioritization framework (see above under “Effectiveness”).

As explained previously, IPs are not consistently assessed for PSEA capacities, and service providers, IPs and TPCs need to be more systematically supported by IOM to strengthen their PSEA capacities to meet basic standards and accountabilities (see “External Coherence” and “Effectiveness”). This should become mandatory within IOM and dedicated technical and financial resources should be mobilized to move this requirement forward within IOM’s operations.

Integration of PSEA in IOM’s Project Handbook, PRIMA and the establishment of minimum standards for L3 emergencies are also needed to ensure projects are integrating PSEA from the very beginning, starting with risk assessments, which can be embedded into sectors’ own needs assessments, and subsequently, in proposal design, budgeting, implementation, etc.

7b. To what extent was capacity developed, especially at the field level, to ensure the sustainability of efforts and benefits?

While IOM’s strategy includes scale up efforts to recruit dedicated PSEA officers in a number of locations, the present reality is that most PSEA Focal Points are double hatting and some appointees are unfit for the role, especially due to the lack of background in PSEA, Protection or GBV-related areas. To some extent, the development of standard TORs for PSEA Focal Points by the PSEAH Unit - to formalize the requirements of the role - has helped to address this problem by encouraging more adequate appointments by CoMs. Another important development in solidifying IOM’s internal PSEA structure is the mapping of the CO PSEA Focal Point network by RO PSEA Focal Points, which is currently underway and implemented in a staggered approach.

Recently, PSEA resource requirements have been identified within resettlement and GHAP programming, as well as the Ukraine response and other projects. This recent resource mobilization strategy will lead to the establishment of a total of 50 new IOM dedicated PSEA staff positions tasked exclusively with supporting PSEA strengthening efforts across multiple countries within all nine IOM regions by the end of 2022. This is the start of an approach that is to become institutionalized and, as the Organization more systematically employs a risk-informed approach to guide PSEA decision-making, it is likely that many more dedicated PSEA positions will be created in the coming years. The establishment of PSEA dedicated positions will be pivotal in strengthening the field-level capacity to deliver on the victim-centered approach, hence, the urgency in reaching institutional consensus on critical policy and operational issues related to the victim-centered approach⁷².

⁷² *These are: Ensuring the timely support for safe, timely and accessible information on SEAH victims’ rights tailored to communities’ preferences and needs (e.g., consider various communication tools and modalities to accommodate various groups); Implement community consultation and ensure participation of all groups so that prevention and support to SEAH victims needs and priorities are responsive to beneficiaries’ needs and priorities (e.g., systematically*

The IOM PSEAH Toolkit and Checklist provides detailed guidance on PSEA mainstreaming into projects and programmes, including proposals' budgets, and many PSEA Focal Points who attended the IOM PSEAH global workshop in June 2022, where the PSEAH Toolkit and Checklist was introduced, have been advocating more strongly for PSEA inclusion into projects' proposals and budgets within their respective regional and country offices and field operations.

Significant progress has also been made on increasing awareness on reporting. The majority of IOM staff have undergone PSEA mandatory training and, while there may still be confusion around definitions and mandatory reporting obligations (SEA vs sexual harassment), informants recognized that most staff know about existing channels to report allegations.

Despite important achievements, the External Evaluation identified a few areas where further attention and investments are needed to ensure adequate structures and capacities are in place to support the sustainability of PSEAH efforts.

First, some core PSEAH-relevant units and departments, especially investigations, are highly centralized at HQ-level; cascading positions to the regions would ensure these important functions are in place to deliver on their mandate in a much more agile, cost-efficient and effective manner.

As noted earlier, audience-tailored training for all key staff supporting PSEAH efforts within missions is required to clarify roles, responsibilities and accountabilities. Induction training packages for PSEA Focal Points, dedicated PSEA Officers and other staff that play a key role in moving PSEAH efforts forward at mission-level, notably, the CoMs, is vital, especially following the launch of the IOM PSEAH Toolkit and Checklist and the expectation that regional and country offices should start working on their respective PSEAH Action Plans.

Presently, PSEA Focal Points in IOM's ROs are also double-hatting and have very limited bandwidth to support PSEA activities. Yet, if turned into dedicated RO PSEA positions they could be used much more strategically, becoming an integral part of the PSEAH unit's core structure⁷³. Dedicated, regional-level PSEA experts could play an instrumental role in driving PSEAH efforts forward in their respective region, for example, by providing training, cascading guidance, supporting risk assessments, development and implementation of PSEA Action Plans, supporting country missions at the onset of a crisis or as required,

consult women and girls and other community groups at risks of greater exposure to SEA to hear their preferences for complaints reporting channels and handling); Facilitate referral of adults and children's victims – directed from OIG to the PSEAH units - to timely and appropriate assistance and services in IOM operations; Support and facilitate safe and confidential information sharing on cases' handling with victims taking into consideration their preferences.

⁷³ This is similarly to the approach taken by IOM on GBV and could provide relevant lessons-learned. However, for GBV, institutional approach, tools, guidance and outreach were first extended to COs before decentralizing and expanding to bolster institutional capacity at RO level.

etc. Structuring PSEA capacities in a way that empowers ROs will also help ease the burden on the already much overstretched PSEAH team in HQ, while providing a cost-effective model for building mission capacity through a trickle-down approach.

As previously discussed, synergies between PSEA and Respectful Work Environment Focal Points are not sufficiently unpacked; clarity on how these two Focal Point roles can work together is critical to ensure missions have adequate structures in place to address sexual harassment issues⁷⁴.

The final missing piece is the lack of consistent implementation of IP capacity assessments and support to IPs, service providers and TPC in building their own PSEA capacities to ensure these are on par with IOM's standards. This includes, first and foremost, the need to make PSEA capacity assessments a mandatory requirement within IOM and mobilizing the necessary technical and financial resources for supporting TPC, service providers and IPs in meeting PSEA standards. Failing to deliver on this commitment may further the accountability gap, allowing risks to remain unchecked and abusers to go unpunished, eroding IOM's credibility in the eyes of affected populations, victims, beneficiaries and donors.

7c. How has funding been secured to ensure implementation of the PSEA approach at all levels, and do these funding models remain relevant and appropriate going forward?

At the global level, two out of three core PSEAH Unit staff are core funded, which highlights the increased institutional recognition of the criticality of PSEAH and that this central organizational function requires a long-term horizon and cannot rely on unpredictable, project-based funding. Notwithstanding, very few resources are channeled to the PSEAH Unit to fund staffing expansion and activities. As mentioned earlier the size of the Unit is considerably small to meet the needs of the Organization.

Given the absence of a dedicated, core budget to implement PSEAH activities, the PSEAH Unit has been consistently leveraging diverse funding sources to support PSEAH functions. Un-earmarked funding from the IGF is currently used to support the WAAI platform, currently housed with IOM's GDC, and in the past, to support the development and delivery of PSEA training and awareness raising materials. Due to the highly flexible nature of IGF funding, it would be important to continue to use this resource to fund other types of PSEAH activities (for a detailed exploration of how PSEAH could align and enhance the objective and components of the IGF, please refer to "Internal Coherence"). Additionally, the Unit is also tapping into project-funded, unearmarked, pooled resources from the Migration Resource Allocation Committee (MiRAC), by aligning PSEAH activities with broadly defined priorities of contributing donors and recently, through separate donor funding, secured funds for a project on PSEA and risk management within two pilot countries.

⁷⁴ Note that, while not recommended, in some contexts these can be the same individuals.

Yet, predictable, adequate funding, guaranteed year to year to support PSEAH efforts globally is vital.

Currently, field-level PSEA resources are mostly project-funded and PSEA Focal Points are often double-hatting, juggling between PSEA and their regular job responsibilities. Many IOM PSEA Focal Points engaged in the evaluation expressed concerns over this model, which they view as detrimental to the prioritization of PSEA. Recognizing this limitation, IOM has been intensifying efforts to fundraise for dedicated PSEA positions across various operational settings and programmes, wisely relying on a diversified funding strategy that taps into funding opportunities across multiple programmes, projects and donor funding streams, as well as direct donor contributions⁷⁵. It is important to highlight that while much of this was pushed through advocacy efforts at the global level, sustainability requires CoMs to drive this forward.

Efforts to scale up PSEA mainstreaming in wider responses and projects, for example the Ukraine response, are also underway. While this certainly represents a step in the right direction, this approach brings its own challenges as embedding PSEA into country-level project budgets means, in practice, that each mission has full control over its own PSEA funds. This creates challenges for mobilizing resources to support core PSEA coordination functions and activities that cut across a regional response or several countries, for example, establishing a regional PSEA Coordinator position to support the response holistically and developing and rolling out PSEA initiatives that target more than one country. A shift in mindset is necessary to accompany the current PSEA resourcing strategy within programmes, projects and regional and country offices understanding that a comprehensive approach to PSEA brings significant advantages to efficiency, effectiveness and impact. To the greatest extent possible, secured resources should be invested strategically to support and multiply PSEA efforts.

In addition, under the Budget Reform process, IOM is also exploring options for moving CoMs and mission-level resource mobilization positions to core funding, which leaves room for missions to add in costs for other personnel and activities, such as PSEA, without significantly increasing overall project budgets. This is an important institutional incentive that will likely encourage more PSEA integration into projects and programmes' proposals and budgets.

Donors that took part in the Evaluation recognize the importance of PSEA and have indicated willingness to support IOM's PSEAH efforts through un-earmarked funding⁷⁶, dedicated budget lines within wider projects or through dedicated PSEAH projects; IOM must seize the momentum and position itself strategically vis-à-vis its donors on PSEAH funding. As with the PRM-funded GBV institutional capacity building project, there are opportunities for IOM to launch its own dedicated PSEA institutional strengthening project, as these require concerted, predictable and continuous investment over a long span of time.

⁷⁵ For further detailed breakdown of funding sources, please refer to Annex B.

⁷⁶ This is critical as it can be an important source of funding to support PSEAH staffing positions.

IV. Conclusion

A key conclusion emerging from the evaluation is that significant institutional progress has been made on PSEAH, at the institutional, policy, programming and operational levels. Starting with the setting of a dedicated, technically qualified, accountable PSEAH unit within HQ, the past two years have seen a considerable evolution in IOM's approach to PSEAH, which has matured into a more structured and coherent framework. Building on important milestones of previous years, such as the development of training packages that were taken on as model resources by wider UN entities and creation of the WAAI platform, successes were achieved in several fronts, notably:

- The establishment of the IOM PSEAH Senior Coordinator role, and the set-up of a dedicated PSEAH unit (2 out of 3 staff core-funded in 2022), demonstrating commitment, centrality, and prioritization of the PSEAH issue internally within IOM.
- Mandatory training on PSEA to all IOM staff and related personnel has a good degree of coverage and has effectively raised staff awareness on IOM's reporting channels.
- The success of IOM's PSEA training resulted in the development of an inter-agency PSEA training ("Saying No to Sexual Misconduct"); six PSEA micro-modules with key messages to prevent the forgetting curve were developed, which were subsequently rolled out in 2021 in English and 2022 in Spanish and French (with other languages currently in the pipeline)⁷⁷.
- Development and launching of the "Best Practices in the Prevention of Sexual Exploitation and Abuse (SEA) in Resettlement and Movement Operations," a self-paced, virtual PSEA learning course developed to address specific movement management and resettlement risks, scenarios, and mitigation measures.
- The IOM HQ PSEAH Task Force was revitalized, and Terms of Reference updated to reflect the changing landscape of PSEAH.
- The launch of the IOM PSEAH Toolkit and Checklist in September 2022, this critical resource that provides an operational model for implementing IOM's approach to PSEAH, outlining practical actions that IOM's offices and programmes should take to deliver on PSEAH accountabilities.
- Integration of PSEAH modules within the IOM Chief of Mission training and the IOM Emergency Response and Induction Training (ERIT) for staff preparing for deployment to emergency and humanitarian contexts.

⁷⁷ PSEA micro-modules with a focus on: 1) demystifying power relations; 2) defining sexual misconduct; 3) leading by example; 4) understanding how a victim can be impacted by sexual trauma; 5) IOM's duty of care to victims of SEA; and 6) reporting SEA within IOM. Each micro-module features interactive exercises, new case studies, and two new animated videos emphasizing the use of a victim-centered approach and the Do No Harm principle. The IOM PSEA micro-modules, while benefitting all IOM staff and partners globally, are especially beneficial for those in direct contact with affected populations and/or those who are sent on rapid deployment. Each PSEA micro-module ends with a reminder on the obligation to report SEA, highlighting the use of IOM's awareness raising and misconduct reporting platform *We Are All In*.

- Establishment of a formal, duly appointed, network of PSEA Focal Point across all IOM offices⁷⁸ coupled with the roll out of standard, formalized Terms of References (TORs) for PSEA Focal Points and Officers as of late 2021, ensuring a more coherent use of PSEA human resources at country and regional levels.
- Efforts to strategically hire dedicated-PSEA staff across high-risk programmes and operational contexts, with several pilots currently underway with funding from the United States Refugee Admissions Programme (USRAP), United Kingdom Afghan Resettlement Assistance Programme, Canada Resettlement Programme, Global Health Assessment Programme (GHAP), and regional Ukraine crisis response.
- Rollout of the UN ClearCheck throughout IOM.
- Inclusion of PSEA in the onset of the Ukraine response.
- IOM co-leads the UN Chief Executive Board Task Force on Sexual Harassment, Workstream on Prevention and Behavioural Science, with the UN Secretariat.
- Through a dedicated inter-agency PSEA project, IOM continues to support collective PSEA actions at the country level, including strengthening inter-agency PSEA Networks and UN Country Team/Humanitarian Country Team PSEA approaches. IOM also leads the global PSEA Coordinator capacity building initiatives and thus far, has capacitated a pool of over 100 future inter-agency PSEA Coordinators. The Organization also contributed extensive support to the IASC through the development of Generic Terms of Reference, aimed at harmonizing the roles and responsibilities of PSEA Networks, PSEA Focal Points, and inter-agency PSEA Coordinators.

Two areas of work currently in the pipeline are: 1) “Together We Say No” campaign with WFP and Translators without Borders which will be available in 27 languages targeting frontline workers who are in direct contact with affected populations with simple PSEA messaging through audio and visual communications; 2) Prevention of Sexual Harassment communication campaign currently underway.

Moving forward, the evaluation has identified the following key areas in need of further prioritization and strengthening to maximize relevance, coherence, efficiency, effectiveness and impact, and guarantee sustainability of PSEAH efforts:

- More deliberate consideration of beneficiary and SEAH victims’ needs and priorities into the revision of PSEAH-relevant policies, standards, SOPs revision and institutional guidance;
- Assigning institutional accountability for the victim-centered approach, including by establishing of a senior-level Survivor Care Office position within the PSEAH unit to offer case management services and support/guidance to complainants of sexual misconduct, and to advance the implementation of the victim-centered approach within IOM (for more details on the suggested role and responsibilities of this staff please refer to Box 3);

⁷⁸ The PSEAH unit has implemented a staggered approach, nominations have been completed for ROs but are still trickling in for COs.

- Development and implementation of a victim-centered approach and corresponding operational guidance for missions including:
 - SEAH case management,
 - Information on victims' rights and IOM accountability framework,
 - Protection and safety of victims,
 - Timely and quality victims multisectoral assistance
 - Safe and ethical information sharing on SEAH cases
 - Capacity strengthening
 - Advocacy for SEAH victims' rights and dignity
- Development and implementation of a risk-informed approach and more systematic project- and ground- level SEA risk assessments to inform PSEA strategies, both in terms of resource allocation decisions and concrete risk mitigation actions to be taken across IOM operations, programmes and projects;
- Upgrades to be made to the WAAI platform to ensure better quality data, more agile investigations and effective referral follow-ups to victim assistance services; and links between WAAI and CFMs to be further unpacked to ensure reports coming from community-based channels are safely entered into WAAI and received by OIG;
- Enhancement in investigations' human, technical and language capacities to ensure the function is better equipped to meet the requirements of victim-centered investigations, including geographic decentralization to ensure functions are more rapidly deployed to field locations;
- More strategic and systematic PSEAH communications;
- More consistent implementation of IP capacity PSEA capacity assessments and efforts to build IP and TPC PSEAH capacity (especially in complaints handling and investigations); as well as more systematic monitoring of IP and TPC compliance with IOM's PSEAH provisions.
- Establishment of PSEAH dedicated Regional Officer/Roving staff to support emergency/humanitarian responses and better integrate PSEA within programming at the onset.
- Development of audience-tailored training and induction packages, available in different languages targeting different audience groups, such as CoM, Managers, dedicated PSEA Officers and Focal Points, etc.;
- Development of robust M&E framework, including indicators to periodically assess the system's collective performance and the impact of IOM's PSEAH strategic approach.

V. Recommendations

1. RELEVANCE

1.1. Bring the voices of affected populations, and needs and priorities of victims, to the center of discussions; ensure these are used to guide decision-making, especially in policy revision processes⁷⁹. The application of a human-centered design⁸⁰ approach to policy re-design would be highly beneficial and is strongly recommended, as it would help bring the needs and priorities of victims and the affected populations to the center of decision-making.

1.2. Enhance IN/go Rev.1 in a potential follow-up update or in the roll-out of the guidelines:

- a. Ensure IN/go Rev. 1 is consistent with IOM's overarching vision and commitments to the prevention, mitigation and response to sexual harassment risks, with specific reference to "IOM's Strategic Approach Toward the Prevention and Response to Sexual Exploitation and Abuse and Sexual Harassment", including its five priority areas⁸¹;
- b. Introduce and clarify roles and responsibilities of the PSEAH Senior Coordinator and PSEAH Unit, as well as any other relevant operational-level staff that support sexual harassment prevention and response efforts (i.e., PSEA and Respectful Work Environment Focal Points⁸²);
- c. Address the specific the differential nature of sexual harassment vis-à-vis other types of abusive or inappropriate behaviour in the workplace;
- d. Introduce IOM's vision, guiding principles and operationalization of IOM's victim-centered approach to prevention and response to sexual harassment (see further details below under "Effectiveness");

⁷⁹ For guidance and good practices in giving communities an active role in these processes, please refer to: <https://empoweredaid.gwu.edu/>

⁸⁰ For further details, please refer to "[The Field Guide to Human-Centered Design](#)". Laurens Kymmell and Taryn Kurtanich offers interesting insight on the work the SEAH Community of Practices (COP) set up by USAID and the Netherlands Ministry of Foreign Affairs highlighting findings and recommendations on one key question: how do we ensure that the needs and rights of survivors are at the centre of efforts to prevent and respond to SEAH? How do we ensure that it is the survivors to whom we are accountable?". [Accountable to whom ? Moving towards a survivor-centred approach to sexual exploitation, abuse and harassment. Laurens Kymmell and Taryn Kurtanich, pages 72 - 77, Humanitarian Exchange, Issue 81 June 2022, Humanitarian Practice Network \(HPN\) at ODI.](#)

⁸¹ "IOM must continue to ensure its Strategy towards the prevention of and response to SEAH remains a key priority going forward with a focus on five priority areas: 1) Leadership and Organizational Culture; 2) Institutional Accountability and Transparency; 3) Capacity-Development, Behaviour Change and Communication; 4) Quality and Accessible Victim Assistance; 5) Partnership and Coordination". IOM's Strategic Approach toward the Prevention and Response to Sexual Exploitation and Abuse and Sexual Harassment (2021).

⁸² Note that while Respectful Work Environment Focal Points can listen to understand, help visitors explore options and inform colleagues about policies, they do not take any action and cannot be used as reporting mechanism due to their ethical duties and independent role, as established in the Office of the Ombudsperson's Charter.

- e. Introduce gender-sensitive considerations guiding the provision of informal assistance in cases of sexual harassment (e.g.: aspects related to the voluntary and confidential nature of the process, support extended to victims to enable them to make informed decisions on formal reporting or informal resolution avenues⁸³, gender-sensitive mediation processes that take into account victims' needs and priorities, including mediator, venue, peer-support, psychological support⁸⁴, etc.);
- f. Establish links and develop specific technical guidance to inform and support the collective delivery of IOM's approach on sexual harassment.

1.3. For IN/234, IOM should consider reflecting the following recommendations in the revised policy or accompanying guidance:

- a. Align the PSEA Policy with IOM's overarching vision and commitments to the prevention, mitigation and response to SEA risks with reference to "IOM's Strategic Approach Toward the Prevention and Response to Sexual Exploitation and Abuse and Sexual Harassment" (5 priority areas⁸⁵);
- b. Adoption of a broader statement prohibiting sexual relationships with beneficiaries, unless otherwise previously disclosed to the Ethics and Conduct Office; IOM's Relatives in the Workplace form, already in use, can be updated to clearly address this requirement.
- c. Introduce of IOM vision, guiding principles and operationalization of IOM victim-centered approach in complement to the PSEA Policy, including, for an example, definition of the victim-centered approach and the rationale for adopting a victim-centered approach to guide the organization's response to sexual misconduct.
- d. Introduce and outline the risk-informed approach and how it will be operationalized to guide decision-making on PSEA prevention and response;

⁸³ Informal resolution avenues may involve mediation by managers, CoM or the Office of the Ombudsperson, whereas formal avenues involve an investigation by OIG and, potentially, administrative disciplinary measures against the offender if sexual misconduct is proven.

⁸⁴ "One of the most impactful and early steps in promoting a VCA was the decision (...) to establish the position of Victim Care Officer (VCO). The VCO, a licensed clinical psychologist, provides confidential psychosocial support, guidance and accompaniment to victims of SH. The VCO helps to identify and assess risks victims may face and ensure their needs are met irrespective of the resolution process they choose". [UNHCR's journey towards a victim-centered approach, Diane Goodman, Blanche Tax and Zuhura Mahamed, page 69. Humanitarian Exchange, Issue 81 June 2022, Humanitarian Practice Network \(HPN\) at ODI.](#)

⁸⁵ "IOM must continue to ensure its Strategy towards the prevention of and response to SEAH remains a key priority going forward with a focus on five priority areas: 1) Leadership and Organizational Culture; 2) Institutional Accountability and Transparency; 3) Capacity-Development, Behaviour Change and Communication; 4) Quality and Accessible Victim Assistance; 5) Partnership and Coordination". *IOM's Strategic Approach Toward the Prevention and Response to Sexual Exploitation and Abuse and Sexual Harassment (2021).*

- e. Clarify and ensure coherence and complementarity between the PSEA Policy and other IOM instructions (IN/90 Rev. 1⁸⁶, IN/282⁸⁷, IN/275⁸⁸);
- f. Establish linkages with specific, detailed technical guidance to support the joint operationalization of IOM's vision and commitments on PSEAH.
- g. Revise the application and policy operationalization to cover IPs, TPCs and service providers including: a) mandatory PSEA IP capacity assessment to be roll out through a phased approach (e.g.: targeting initially IPs delivering programmes in high-risk contexts and those interacting directly with affected populations); b) revise contractual clauses (if needed) to reflect any identified change in policy and practice; c) outline considerations on potential support and oversight by OIG of investigation of cases involving TPC staff as alleged perpetrators, to accompany developments already happening across wider UN-system entities⁸⁹.
- h. Reflect IOM's obligations towards information sharing on SEA allegations with RC/HCs, as is the case with other UN entities, for example, UNHCR, UNFPA, UNICEF, WFP, UNDP, etc.

1.4. Address major gaps in IOM's implementation of the victim-center approach to PSEAH (see detailed recommendations under the corresponding sub-heading below in "Effectiveness").

1.5. Develop and implement a risk-informed approach to align the PSEAH approach to IOM strategic vision to improve predictability and prepositioning of PSEAH resources across all IOM operations, projects and programmes (see detailed recommendations under the corresponding sub-heading below in "Effectiveness").

1.6. Ensure IPs', service providers' and TPCs' PSEAH practices and systems are on par with IOM's standards so accountability is even across all workforce categories (see follow-up recommendations under "Effectiveness" and "Efficiency").

1.7. Expand technical expertise, resources, guidance and develop approaches that are fit for purpose for children and people with diverse SOGISEC.

Once addressed, developments and improvements made to the overall system should be reflected in key PSEAH-relevant policies to promote alignment between policy and policy delivery (see "Internal Coherence").

⁸⁶ IOM, *Policy for a Respectful Working environment: Addressing i) Discrimination, ii) Harassment, including sexual harassment; and iii) Abuse of Authority (IN/90 Rev 1.)*, 2021.

⁸⁷ IOM, *Policy for Protection against retaliation for reporting misconduct or cooperating with investigations and audits (IN/282)*, 2022.

⁸⁸ IOM, *Reporting and Investigation of Misconduct Framework (IN/275)*, 2019.

⁸⁹ For example, UNFPA, UNICEF, WFP, UNHCR; for reference, please refer to Annex A.

2. INTERNAL COHERENCE

2.1. Clarify, and communicate more strategically, the PSEAH unit's role and responsibilities, including PSEAH domains that fall under its responsibility (e.g.: the victim-centered approach) and those areas that it currently does not have the capacity to lead on (e.g.: child safeguarding issues)⁹⁰.

2.2. As the main coordination body on PSEAH issues, the PSEA Task Force should be more results-oriented; it can be leveraged as a collective forum for producing joint deliverables, and enhance PSEA integration across programmes and other relevant policy areas. To reach this goal, the PSEAH Task Force should: a) meet more regularly; b) have a workplan that articulates tangible deliverables, and corresponding responsibilities, targets and timelines; b) be co-chaired by DDGs Pope and Daniels, alternately.

2.3. Under the steer of senior leadership, the revision of IN/234 (and potential future revisions of IN/go Rev 1 and corresponding guidance) should be used as an opportunity to address critical gaps in internal coherence. The process should bring together HQ-level PSEAH-relevant departments, as well as cross-cutting sectors and policy areas, to reach consensus on fundamental issues, so that IOM can speak with "one voice" when communicating its vision, strategic objectives, and priorities on PSEAH. As noted earlier, the PSEAH HQ Task Force is a suitable forum for hosting policy discussions and this option should be explored.

2.4. Draw more systematically on lessons-learned and best practices from IOM DOE's PRM-funded Safe from the Start/GBViC Institutional Capacity Building project and IOM's own accumulated experience integrating GBV into non-Protection-specialized sectors. Considering existing similarities and potential synergies, GBViC efforts can be useful in informing approaches to PSEAH institutional strengthening.

3. EXTERNAL COHERENCE

Alignment with UN/international norms and standards

3.1. Set milestones and timelines for resolving IOM's position on the adoption of UN/international norms standards, and moving forward with any necessary subsequent institutional reforms. Some specific issues requiring urgent positioning are:

- a) Systematic sharing of non-identifying case information on SEA with RCs/HCs, as IOM is one of the only UN entities presently not providing this information;
- b) Mandatory IP capacity assessments, which can be initiated through a phased approach that would make it an internal requirement for high-risk programmes and operations as a first step.

⁹⁰ For examples on broad institutional digital communication, please refer to [UNFPA](#), [UNHCR](#) and [WFP](#) webpages. [The self-learning application on protection from sexual exploitation and abuse \(PSEA\) in Lebanon](#) offers good examples of short-videos and easy-to-access communication tools.

3.2 Better explore its commitment to system strengthening and its distinctive asset as a “proximity” organization (that puts IOM operations closer to where SEA risks are): if more consistently employing a risk-informed approach to operations and programming, IOM can use its own experiences to enrich the global PSEA knowledge base and inform the work of others. This would not only help to strengthen safer programming practices but also solidify IOM’s credibility vis à vis donors and peer organizations.

3.3. Invest more in Protection/GBV dedicated programming especially in high-risk operational contexts, which donors recognize to be strong areas of programming and technical expertise within IOM. Ultimately, such investments would also contribute to expanding IOM’s capacity to deliver victim assistance services, making use of its own Protection/GBV programming and filling critical gaps in contexts where such services are not available.

Working with others

3.4. IOM should continue to be an active and strong supporter of PSEA inter-agency efforts at global regional levels. Institutional resolve on unsettled policy issues (e.g.: inter-agency information sharing, use of the UN Incident Reporting Form, etc.) will help make IOM’s position clearer on these issues and support more strategic engagement of IOM staff in inter-agency fora, solidifying IOM’s position in these platforms. Hence the urgency in moving forward with these discussions at HQ-level.

3.5. Potential future revisions of existing MOUs signed with UNICEF and UNFPA should be expanded to reflect the role of these entities as providers of last resort. In parallel, guidance should be provided to missions on how to activate external partnerships for victim assistance in settings where providers of last resort (UNICEF and UNFPA) may need to be triggered, so these referral pathways are incorporated into missions’ victim assistance SOPs.

3.6. A short guidance or technical note should be issued outlining key PSEA issues to consider when working with governments. It should address issues such as how, within well-known limitations, IOM can introduce SEA topics in a way that is context and culturally appropriate, advocate for safer programming practices and support accountability for SEA cases involving government counterparts.

4. EFFECTIVENESS

Risk-informed operations and programming

4.1. Strengthen efforts to promote safer programming:

- a) Develop and roll-out of a robust yet easy-to-deploy risk analysis, prioritization and mitigation framework⁹¹, suitable to the realities and capacities of IOM;
- b) Ensure that the framework is consistently used to inform operations and programming;

⁹¹ Action on this recommendation has already been initiated through the second deliverable of the PSEAH Evaluation consultancy.

- c) Ensure that IOM has the necessary human, financial and technical capacity to consistently implement the framework – this may involve training staff or recruiting additional capacity;
- d) Widely disseminated risk analysis associated products to enhance the PSEA knowledge base and inform global approaches.

Note that the risk-informed approach will ensure all IOM programmes and operations, even those considered low-risk, implement at least minimum standards of PSEA and have required human and financial resource requirements in place to advance the protection against sexual exploitation and abuse.

Strategic Communications

4.2. IOM's senior organizational leadership and the PSEAH Unit should make more systematic strategic use of communications.

- a) Communications from leadership to all staff should continue to raise awareness on PSEAH and demonstrate IOM's commitment to the issue to ensure it remains high in the agenda and momentum is not lost. Powerful messaging⁹² should be used to address barriers to reporting, widespread perception of impunity, showcase efforts, highlight best practices, etc.
- b) Communications from the PSEAH Unit to the network of dedicated-PSEA staff/Focal Points should be more regular and predictable. It ensures field staff are informed of HQ-level ongoing and planned work, especially on any new guidance to be rolled-out, latest organization-wide PSEAH developments, and is also used as a vehicle to solicit inputs on specific deliverables to strengthen two-way communication and keep the Network motivated⁹³. A periodic newsletter (in the form of a concise email) to the Network should be circulated and regular "Questions & Answers" webinars should be organized. Moreover, a PSEAH community of practice should be articulated, for example, through a Yammer group or other fora promoting interaction among staff by encouraging the sharing of ideas, updates, questions, tools, etc.

Sexual Harassment

4.3. Joint effort by key IOM units in HQ - PSEAH, Office of the Ombudsperson, DHR, OIG, ECO and Office of Staff Security - urgently needed to address critical gaps in sexual harassment:

- a) Enhance messaging to clarify and emphasize to staff on: 1) differences between SEA and SH, and which carry mandatory reporting obligations; 2) options and services available for SH victims, including implications of opting for formal versus informal resolution avenues.
- b) Clarify the role of key HQ departments and mission-level staff (CoM, Security and DHRM, PSEA and Respectful Work Environment Focal Points); establish protocols anchored in the need-to-know principle for safely and timely escalating the sharing of information in the event of risk and threats of retaliation (under which circumstances? when? how? who?).

⁹² Annex C provides examples of powerful communications sent by key UNFPA departments and senior leadership to all staff which can be used for inspiration.

⁹³ Please consult [the WFP mid-year highlights example](#).

- c) Produce practical guidance, tailored to each relevant mission-level staff on role and responsibilities in the event of SH case (e.g.: what should be prioritized, what is expected from each actor receiving the complaint, etc.); a concise, practical document in the form of a “decision tree” that also contains basic information on “do's and don'ts”, building from examples and good practices from the GBV sector (e.g. [GBV Pocket guide for humanitarian practitioners](#)).
- d) Given that IN/go rev 1 has been already launched, train Manila DHRM and Office of Staff Security staff on aspects related to SH.

4.4. Continue moving forward with prevention of SH efforts within IOM and externally through inter-agency platforms, as new co-chair of the workstream on prevention and behaviour change within the UN Chief Executive Board on Sexual Harassment. Internally, this may involve not only developing, rolling out and sustaining the soon to be launched communication campaign on the Prevention of Sexual Harassment, but also by fostering opportunities for bringing attention to the issue, for example, by creating dialogues with colleagues on the issue, delivering and supporting dedicated training, integrating sexual harassment as a topic in wider communication and training materials, etc.

Reporting & Complaints handling

4.5. Similar to WFP’s Navex reporting platform (see Box 5), improve IOM’s reporting form and upgrade the digital platform to render the complaints handling process more effective and efficient in line with the victim-centered approach (in conformity with high standards of data protection).

Box 5 – WFP Navex Platform

The WFP Navex platform was established in 2020; its design and features facilitate, streamline and enhance reporting and investigations, while ensuring safety and confidentiality of information:

- a) The individual entering the complaint receives a user name and password that it can then use to log back into the platform to communicate with the lead investigator assigned to the case to provide additional information (including upload documents/evidence, etc.), receive updates on the status of investigations;
- b) The Individual entering the complaint can adjust preferences depending on how confidential it wants the information to be, including who can have access to it and who can edit it (in such instance, a built-in feature will track edits, i.e., who made edits and when).
- c) Before case information is entered, critical “filter” questions are prompted; for instance, at this stage, the individual entering the report is given the option to remain anonymous, etc.
- d) The Navex form contains predominantly pre-set drop-down fields; this facilitates reporting, enhances data quality and helps to ensure that all basic information necessary for action at intake stage is provided at the moment of reporting.
- e) The use of customized data entry fields generates standard data points that can be used for creating dashboards to inform analysis of reporting trends and patterns across time, including disaggregation by location, type of misconduct etc.
- f) The platform has a search function that enables investigators to trace patterns that may indicate recurrent abusers, which is especially useful in instances of sexual misconduct.
- g) The platform has various “users rights” that can be assigned according to the types of roles which guarantee a safe and confidential management of personal data.

The updated IOM reporting platform should:

- a) Include all basic information required to facilitate and expedite intake and the initial assessment, and addresses minimum victim assistance information requirements to enable referrals, including by OIG - if not yet done at the point of receiving the complaint from the field (e.g.: the form could include a box that can be ticked to confirm that the victim has already been referred to services)
- b) Include a mechanism enabling regular, confidential and anonymous communication between the lead investigator within OIG and the individual submitting the report (either PSEA Focal point/dedicated-PSEA staff, victim or other) to facilitate the collection of any additional required information and the sharing of case status updates. Note that this feature would also help make the platform attuned to the needs of mobile populations.

4.6. Develop practical, detailed guidance on how to safely and confidentiality transfer SEA reports received through local complaints and feedback mechanisms to the WAAI platform, addressing minimum victim assistance information requirements to enable follow-up referrals (if not done at the point of receiving the complaint). The guidance should account for resource, expertise and staffing structure differentials within IOM offices (e.g.: if the mission has Protection expertise/capacity, etc.)

4.7. At global level and regional levels, IOM should invest in greater AAP technical capacity and programmes and operations should commit more efforts to identifying - jointly with affected populations, especially women and girls - preferences around safe, accessible and appropriate reporting channels for SEA, and on how to effectively communicate with beneficiaries and affected populations on PSEA. Examples, tools and best practices should be widely disseminated within IOM programmes and operations.

Investigations

4.7. Physical decentralization to increase field office presence⁹⁴ and expansion of OIG's human resources to reflect diverse technical and language capacities are recommended to ensure it is able to more effectively and timely respond to, and meet requirements of, survivor-centered investigations. By lessening requests for mission support during investigations, due process will also be enhanced. In the interim, OIG should continue to expand its roster of vetted, qualified investigation professionals with diverse language skills and SEAH-relevant profiles (e.g.: survivor-centered and trauma-informed investigations)⁹⁵.

⁹⁴ Discussions with the Executive Office are ongoing on the question of OIG field office presence.

⁹⁵ OIG currently has a roster of investigation professionals; however, the use of consultants is not always ideal or cost effective. Knowledge of the UN and IOM contexts, regulatory frameworks and jurisprudence are necessary for effective investigations that meet the requirements necessary for the downstream disciplinary process.

4.8. While respecting OIG’s independence and confidentiality, more transparency and coordination between OIG and other units is needed to clarify OIG’s internal processes. The investigation SOPs being developed by OIG could be a great opportunity to test a more collaborative approach, for example, it could be shared within the PSEAH Task Force for comments. Clarity from OIG on its internal processes, which do not include aspects related to specific cases, would contribute to make the work of others more effective, especially in areas of overlap, helping to foster trust in the system.

Victim-centered comprehensive approach

4.9. The PSEAH Unit should have overall accountability for IOM’s victim-centered framework, a critical pillar of IOM’s internal justice system and overall PSEAH approach, including by housing a senior-level Survivor Care Officer⁹⁶ (SVO) position responsible for putting SEAH victims' rights and dignity first (see above Box 3 and below under “Efficiency” for further details).

4.10. The PSEAH Unit should actively support the development of IOM’s victim-centered approach at the cornerstone of its prevention and response framework. This entails:

- a) Defining IOM’s vision on elevating the voices of victims and put their rights and dignity at the forefront, this includes defining rationale and principles underpinning IOM’s victim-centered approach and how it will be operationalized internally within the Organization by the various relevant entities and concerned stakeholders⁹⁷.
- b) In collaboration with ECO, OIG, Security, LEG and DHRM, identify mechanisms that should be put in place to guarantee the security and protection of SEAH survivors during and after investigations (long-term protection of victims).
- c) Working with OIG to develop a joint-information sharing protocol that addresses a) protocols for referring SEA reports from OIG to the PSEAH Unit to facilitate referrals to victim assistance services. The joint-information sharing protocol will clarify rules and regulations on which survivors and case information (or case data points) will be shared between OIG and the PSEAH unit (the Survivor Care Officer), when, for which purposes, and on which format, etc.; b) strengthened overview of SEA trends and patterns (number of cases opened per region, number of cases investigated per region, number of cases closed, whether SE or SA, gender, adult/minor, etc.).

⁹⁶ For additional information on the roles and responsibilities of UNHCR Senior Victim Care Officer, please consult : [Victim Care in Action](#). For additional information on the roles and responsibilities of the UN system-wide VRA, and Senior Victims Rights Officers appointed in the Central African Republic and the Republic of Congo, please consult : [Advocating for the rights of victims of sexual exploitation and abuse, Jane Connors, pages 62-66. Humanitarian Exchange, Issue 81 June 2022, Humanitarian Practice Network \(HPN\) at ODI](#). Jane Connors was appointed in 2017 by the UN Secretary-General. She was appointed to operationalize the objectives of the new strategy to confront sexual exploitation and abuse, with a strong focus on amplifying victims’ voices at the center of PSEAH prevention and response efforts. Consult also: [Victim’s Rights Advocate UN official webpage](#).

⁹⁷ See : [UNHCR Policy on a Victim-Centered Approach in UNHCR’s response to Sexual Misconduct](#).

This policy (i) clarifies what is meant in UNHCR when referring to a victim-centred approach, (ii) confirms the organization’s commitment to apply a victim-centered approach in all (suspected) instances of sexual misconduct (sexual exploitation and abuse and sexual harassment and (iii) spells out which entities are involved in and responsible for operationalizing a victim-centered approach in their work on sexual misconduct.

d) Supporting LEG and OIG in the development of a standardized approach to information sharing with SEAH survivors during investigations (case updates) and upon case-closure (outcomes of the process) in a way that is suitable to the needs of IOM beneficiaries (most which are populations on the move). These processes and protocols should be reflected in the forthcoming SEAH investigations SOPs.

e) Defining funding for ensuring victims can access basic assistance and multi-sectoral services at the various levels and throughout the different stages of the complaints handling process (i.e., from the point of intake to case closure), including establishing partnerships with GBV and Protection actors, and allocating funding for access to and availability of services.

4.11. Define minimum standards for the provision of services for victims of SH, including but not limited to services available within IOM (e.g.: Staff Welfare, GSAC, DHR) and any additional services which may be accessed externally through the staff member's health insurance.

4.12. Ensure that there are robust victim assistance referral SOPs in place within operations that explain who and how referrals will be performed, how IOM will work with the local Protection, GBV and CP sectors, or trigger providers of last resort as applicable, as well as funding requirements to be provisioned to link victims to the appropriate multi-sectoral services.

4.13. Develop M&E framework to assess implementation of IOM's victim-centered approach, conduct periodic reviews and iterate, as required.

Workforce and partnerships

4.14 IOM should ensure a more consistent approach to working with TPCs from procurement and contracting to onboarding of staff, and throughout the time TPC staff are serving within IOM operations. This includes:

a) Exploring avenues for enabling TPCs to join the "Misconduct Disclosure Scheme⁹⁸" as a complementary alternative to UN ClearCheck or, alternatively establish a directive for TPCs to share names of potential new hires with IOM DHR so that IOM can run checks on their behalf.

c) Ensuring more diligent implementation and monitoring of onboarding requirements; for example, by including a contractual clause in staff contracts that that would make deployment or job start contingent upon completion of the mandatory IOM PSEA training, encouraging of TPC staff in the IOM mandatory trainings and finding possible ways for monitoring compliance;

d) Customizing PSEA training and awareness to IOM and translated into local languages, and ensuring these are tailored to the audience group (guards, administrative staff, etc.)

e) Take the necessary steps to ensure TPCs' investigations capacities are on par with international/IOM's standards to guarantee that, while not covered by IOM's internal justice system, the same accountability threshold can be maintained across all workers. The capacity to meet these

⁹⁸ Please consult: <https://misconduct-disclosure-scheme.org>

standards should be part of the procurement due diligence process when selecting a TPC, to ensure they have the capacity to conduct an investigation from the start. Additionally, OIG should develop a simple checklist to support an assessment of whether the TPC has appropriate standards and investigation capacity in place.

4.15. IOM should establish a timeline and targets for making IP capacity assessments mandatory across all operations; the process can be phased and strategically rolled out in line with the risk-informed approach, (e.g.: starting with high-risk operations and programmes then for medium-risk operations and programmes, etc.).

4.16. Strengthen PSEA efforts to more systematically target volunteers and daily workers. For volunteers, IOM should consider establishing its own vetting system or, in contexts where there is strong government capacity, advocate for the establishment of national vetting systems.

5. EFFICIENCY

HQ / Global-level - PSEAH unit human & Technical capacity

5.1. The PSEAH Unit should be significantly expanded, as three staff are not sufficient to meet the demands of IOM's PSEAH approach. It should consider, jointly with senior leadership, additional staffing or technical expertise requirements necessary to strengthen the work of the team, particularly should there be expectation that the unit's scope be progressively widened within a long to medium timeline to encompass other areas of safeguarding, an evolution that is happening in some other UN entities and INGOs. For a short discussion on the advantages and disadvantages associated with which model, please refer to Box 6.

Box 6 - PSEAH Unit or Safeguarding Unit?

In considering whether to revisit the current scope of the PSEAH Unit in the medium to long run, IOM should reflect on the advantages and disadvantages associated with each set-up.

1) **A focused PSEAH Unit** reinforces the rationale for a victim-centered approach – for reference, see Box 1, where the arguments for tailored and specialized support for victims of sexual misconduct are outlined. PSEAH-targeted roles and responsibilities enable a higher visibility and clarity of an organization's commitment to SEAH prevention and response.

2) **A widened scope structured around safeguarding** with a broader "umbrella unit" - that encompasses PSEAH among other areas that relate to an organization's obligation to uphold the wellbeing of staff, partners, affected communities and beneficiaries, and protect them from harm - promotes a vision where accountability for sexual misconduct is integrated as part of an organization's overarching "do no harm" culture. With this second model, there is a risk that the sexual misconduct may be diluted, along with the specific needs and priorities of victims which are very unique by nature.

5.2. A senior P5-level Survivor Care Officer position, within the PSEAH Unit, is urgently needed to drive victim-centered approach efforts forward. This staff member can provide case management services to victims, provide them direct support and guidance during investigations, be a continued source of support throughout the process, and lead technical advice to victim-centered approach policy and guidance, etc. Note that establishing a senior-level position (P5+) is key, as it demonstrates IOM's strong commitment to putting the needs and priorities of victims at the center of its PSEAH efforts (this would be the most senior level position of this kind among all UN-system entities, a move that would be welcomed and appreciated by IOM's donors).

5.3. The PSEAH Unit should consider creating a flexible, roving team of PSEA experts that can provide targeted support to strengthen PSEA efforts within missions. This deployable model would be especially helpful in the context of sudden onset emergencies or other humanitarian crises where capacities need to be scaled-up quickly. A dedicated PSEA institutional capacity-building project would greatly facilitate such efforts (see related recommendation under "Sustainability"). IOM should also identify existing rosters of PSEA experts that they could tap into.

HQ / Global-level - PSEAH-relevant Offices, Departments and Units

5.4 As noted earlier under "Effectiveness", field presence and expansion of OIG's, human, technical and language capacities are critical to ensure the OIG is able to more effectively and timely respond to, and meet requirements of, survivor-centered investigations in an organization of over 17,000 staff and related personnel, and a massive geographical footprint.

5.5. The Office of the Ombudsperson should continue to decentralize as much as possible, as awareness and take-up of its services increase significantly when there is physical presence within the field.

5.6. DHRM should consider any additional resources required at HQ and RO levels or viable alternatives, such as service outsourcing, to cope with mandatory UN ClearCheck requirements and other requirements arising from the revision of key PSEAH-relevant policies that may impact DHRM functions at HQ and operational levels.

5.7. LEG should consider any additional resources required at the HQ-level to support the team with PSEAH related tasks; for example, a Junior Professional Officer (JPO) or UN Volunteer (UNV) could assist with the drafting of letters to the Executive Office, conduct research to inform policy discussions on PSEAH-specific legal matters, etc.

Field Level - PSEA Human & Technical capacity

5.8. Leverage newly-established PSEA positions with the various resettlement programmes and GHAP to support PSEA efforts across IOM's wider projects and programmes, etc. This implies that programmes should be open to pooling and sharing resources and not operate in a siloed manner. Additionally, lessons-learned and best practices from these pilots should be documented and used to demonstrate the

achievements made through these efforts. It should also be used when advocating for scaling up IOM's PSEA approach to other sectors and programmes.

5.9. Efforts should be made to rapidly increase the number of dedicated, full-time, PSEA positions at both RO and CO levels, deployed strategically in line with a risk-informed approach. At RO level, dedicated staff is vital, as these staff can support a portfolio of programmes and countries in strengthening PSEA efforts.

5.10. While the launch of standards TORs for dedicated PSEA Officers constitutes an important step, the PSEAH Unit should also continue to encourage a more deliberate, conscientious nomination of PSEA Focal Points by CoMs to ensure nominated staff meet the requirements of the role (see related recommendation below on PSEAH training for CoMs), possibly integrating messaging around this into training and capacity building initiatives targeting CoMs.

5.11. The PSEAH Unit should collaborate with the Office of the Ombudsperson to find ways to promote more systematic engagement and synergies between PSEAH and Respectful Work Environment Focal Points at the mission-level. This is critical for strengthening sexual harassment efforts within IOM Country Offices, since SH is not included in the ToRs of PSEA Focal Points. Basic guidance can be incorporated into the PSEAH Toolkit and Checklist on how these two key office resources can better work together.

PSEAH guidance & Capacity Building

5.12. Ensure key PSEAH-related policies, guidance and technical resources are translated, at a minimum, into French, Arabic and Spanish. Note that the implementation of the risk-informed approach will also help inform decisions around translation into other languages.

5.13. Expedite the development and roll out a training (or induction package) for PSEA Focal Points and dedicated PSEA Officers, this is critical considering the launch of the PSEAH Toolkit and Checklist in September 2022; a proper induction would better equip PSEA Officers/Focal Points to move forward with PSEAH tasks within their respective offices (e.g.: development and operationalization of the PSEAH Action Plan).

5.14. Building on the PSEAH Toolkit and Checklist, provide audience-tailored PSEAH training to senior leadership, particularly CoMs to clarify expectations, roles and responsibilities, as well as outline the key actions to take in instances of SEA or SH cases within their respective mission, how to respond to media enquires (i.e. only through the HQ Media and Communications PSEAH Focal Point), and what information can be shared with the RC/HC and inter-agency PSEA Network. For example, capacity-building on PSEA could be included in RO yearly meetings that bring together all the CoMs within a

retreat through a dedicated session. Building the capacity is critical given that CoMs have ultimate accountability for PSEAH within their respective offices.

5.15. In addition, it is important to foster "culture change" within the Organization by not only building of capacity of CoMs, but also the capacity of Project Managers, Project Development Officers, M&E Officers, and other key staff to ensure that all play a role in embedding PSEA in programming and management. PSEA-specific training could be organized for Emergency Coordinators, Project Managers, Project Development Officers, etc. These types of initiatives would help to reinforce the understanding that PSEA is everyone's responsibility and everyone has a role to play in preventing and responding to SEAH within the Organization.

6. IMPACT

6.1. Speak with one voice and avoid jargon to explain and disseminate IOM PSEAH vision, guiding principles, objectives and processes, so that IOM staff can better understand the complaints handling process, services they can access, the implications of reporting, how information will be handled, timelines, status update process, etc.

6.2. Establish a robust, overarching M&E framework that captures PSEAH collective results against targets set within its strategic plan given that for PSEAH efforts, the total is more than the sum of its parts. Along the same lines, a system of feedback should be established for learning from specific cases, so that the Organization can continuously improve approaches to strengthen and reinforce SEA risk mitigation within its programming and operations. Even cases that are closed without substantiation have lessons learned.

6.3. Move beyond process indicators (e.g.: "number of staff trained") towards robust measurements that are able to capture accountability and impact. Monitoring, evaluation and learning frameworks, and corresponding indicators should capture changes in organizational and staff attitudes and behavior. For example, "thermometer" surveys can be periodically implemented to monitor perceptions, trust, knowledge, etc. among IOM staff and, especially, senior leadership⁹⁹.

6.4. As with other UN agencies, increase transparency by communicating widely the results of IOM's PSEAH efforts, including, but not limited to, disciplinary measures taken against abusers in a safe and

⁹⁹ See: *UNICEF is the first UN Agency to develop and implement a Pulse Check on the workplace culture that is integrated into its routine monitoring and accountability system. It is intended to be a complement to the more comprehensive Global Staff Survey, and is deliberately brief; All employees are asked to respond to 9 questions, providing their perceptions of different aspects of workplace structure. [Update on the implementation of the recommendations made in the independent panel review of the UNICEF response to protection from sexual exploitation and abuse and the report of the Independent Task Force on Workplace Gender-Discrimination, Sexual Harassment, Harassment and Abuse of Authority.](#)*

confidential manner – trends, patterns, percentages, etc.¹⁰⁰ IOM existing communications on SEAH should be revised to be more digestible, audience-tailored and strategically packaged to help to deconstruct crystalized perceptions of impunity and foster behaviour change among staff.

6.5. Amplify communications through the use of multiple channels to share success stories and achievements on PSEAH – e.g.: ending impunity of abusers, highlighting IOM’s agents of change, impactful sensitization of affected populations on SEA, etc. For example, consider developing an IOM PSEAH mobile application to facilitate the dissemination of key messages, best practices and practical guidance to field staff¹⁰¹.

7. SUSTAINABILITY

Funding Model

7.1. Predictable funding is critical for moving PSEAH forward within the organization. With short-term project funding or uncertainty around funding levels and timelines, the PSEAH Unit is unable to plan, develop and rollout initiatives with a longer-time horizon, or, at the most basic level, retain the necessary staff and technical expertise required to support its work (e.g.: administrative staff, consultants, etc.). For example, steady financial and human resources will be needed to support the roll out of the soon to be launched Sexual Harassment campaign over the next five years (and possibly beyond).

7.2. The projectized nature of IOM requires a diversified funding strategy that relies on multiple sources: core funding from IOM’s central budget (whenever possible); earmarked funding from IGF, MiRAC or similar; dedicated budget lines within wider programming budgets; as well as dedicated PSEAH projects. As noted earlier, an institutional PSEAH capacity building project would be helpful in supporting the strengthening of IOM’s PSEAH internal systems and functions. This option should be seriously explored as there is strong receptivity from the donor community and previous successful experiences on this front that IOM can capitalize.

7.3. At the operational level, in contexts where IOM is delivering both development and humanitarian programmes, PSEA positions can be attached to long-term projects and programming to ensure sustainability but mobilized to support PSEA efforts across multiple types of programmes. Note that this implies that programmes would be open to pooling and sharing resources and not operate in a siloed, territorial manner. The pooled funding model would be particularly relevant to ROs; missions could collectively contribute to fund a regional PSEA expert position tasked with supporting multiple countries and programmes within the region to advance PSEA work.

¹⁰⁰ As mentioned earlier, PSEAH messages recently sent by key UNFPA departments and senior leadership to all staff are included in Annex C and can serve as examples.

¹⁰¹ As previously referenced, [The self-learning application on protection from sexual exploitation and abuse \(PSEA\) in Lebanon](#) is an interesting tool. You can also see the UN Peacekeeping mission [PSEA Training App](#), and learn from the GBV sector app such as IRC’s [ROSA](#), [GBV/SOP Respond developed in Lebanon](#), [GBV Pocket Guide](#).

7.4. Inclusion of dedicated PSEA budget lines to ensure adequate PSEA staffing and activities within project proposals is vital and should continue to be widely promoted and institutionalized across IOM operations and programmes with the caveat that challenges related to a holistic response to PSEA within IOM projects and programming that cut across many countries and sectors (e.g.: development and translation of PSEA awareness materials, establishment of regional dedicated PSEA positions to coordinate the response, etc.). As such, a requirement to allocate a portion of resources to support core, cross-cutting PSEA staffing and activities would be required. Note that considering the set-up of IOM's financial system, this recommendation is easily implementable within L3 emergencies; however, viable options should also be explored for other responses outside the L3 context.

7.5. Continue to explore synergies with IOM's IGF. This unearmarked, flexible funding source can be easily pivoted to PSEAH. Deliberate efforts to integrate PSEAH into the objectives and components of the IGF would make its scope less inward looking and organization-centric, better reflecting accountability to IOM's beneficiaries and, more specifically, SEA and SH survivors. PSEAH aligns well with IGF's Objective 1 on Accountability, as a core function of Accountability to Affected Populations. Additionally, the victim-centered approach is a key pillar of IOM's internal justice system. A major opportunity lies in leveraging the IGF to fund the Survivor Care Officer position within the PSEAH unit.

PSEAH institutionalization

7.6. Ensure consistent and systematic implementation of PSEA risk-informed approach within operations and programmes (see previous recommendation under "Effectiveness")

7.7. Establish more systematic lines of communication between the PSEAH Unit and programmes and policy units within HQ, so as to strengthen institutionalization of PSEAH. This process can be facilitated by having DDG Daniels co-chairing some PSEA TF meetings, alternating with DDG Pope (see previous recommendation under "Internal Coherence"). Additionally, similar to DDG Pope, regular, periodic briefing sessions between the Senior PSEAH Global Coordinator and DDG Daniels should be established. This should be an integral part of feedback and integration within the PSEAH Unit for institutional system strengthening given DDG Daniels' oversight and leadership for operations within IOM. Moreover, valuable lessons and feedback can be captured from both DDGs who regularly visit field operations and engage with women personnel in particular.

7.8. PSEA integration in IOM's institutional handbooks, guidance and frameworks, such as PSEA inclusion in IOM's Project Handbook and PRIMA; develop guidance on integrating PSEAH risk into needs assessments.

7.9. Establish and institutionalize minimum requirements for PSEA in L3 emergencies.

ANNEXES

ANNEX A – BENCHMARKING MATRIX

ORG	POLICY FRAMEWORK & ORGANIZATIONAL STRUCTURE	APPROACH OVERVIEW	ACCOUNTABILITY OVERVIEW	VICTIM ASSISTANCE	RISK MANAGEMENT OVERVIEW
WORLD BANK	<ul style="list-style-type: none"> - PSEAH sits with the gender unit. - PSEA Policy, Good Practice Note Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works, and RM FW launched in 2017. - Holistic, integrated approach (safeguards, risk management, gender, GBV, SEA/SH). 	<ul style="list-style-type: none"> - Focused on creating/strengthening prevention and risks mitigation systems with government receiving loans and contractors/sub-contractors. - Approach focused on creating environment where survivors feel safe and are confident to report cases, as an alternative to mandatory reporting (inc. community-based and survivor-centered 	<ul style="list-style-type: none"> - Approach is survivor-centered from the start, it includes identification of SEA/SH risks identification and the promotion safer programming. - Case verification process whereby the link between the World Bank funded project and the alleged cases is verified happens only with the consent of survivors. - If the she/he doesn't consent to a verification process whereby links between the case and the Bank-financed project are 	<ul style="list-style-type: none"> - WB financed project risk mitigation, prevention and response plan include the identification of referral pathways for safe and ethical referrals to multisectoral services. - Referrals can be facilitated with the survivors informed consent. - Collaboration is encouraged with national GBV services providers for a holistic 	<ul style="list-style-type: none"> - Project Risks scoring includes 2 parts: 1) Context, social norms, gender inequality and GBV indicators (13 questions) – which also links to prevalence/benchmark against regional average; 2) then 12 other indicators/questions that are specific to the project sector (Infrastructures, Education, Health, Social Protection). - The context-related questions are filled out and compiled centrally; updated every 2 years, so project staff only must fill out the 12 project-related questions.

	<ul style="list-style-type: none"> - Gender group, in collaboration with Safeguarding unit, provide technical support to the rollout of the Environment and social safeguards policy and tools. - Regional FPs are operational: 6 GBV experts in regions that also do SEAH. 	<p>grievance mechanisms).</p> <ul style="list-style-type: none"> - Internal mandatory reporting with key cases data points (inc. when available type of sexual misconduct, survivors' age/sex, relationship with Bank project. if survivor received support/referral). 	<p>examined, then the incident is still reported to strengthen due diligence, system strengthening/monitoring measures.</p>	<p>response to GBV survivors needs and priorities.</p> <ul style="list-style-type: none"> - For high-risk level project, projects funds can be leveraged to facilitate referrals and support to GBV/SEA and SH survivors. 	<ul style="list-style-type: none"> - Project soring is complemented with OTHER types of assessments, esp. through community consultations (inc. women and girls). - Risks rating Low, medium, substantial, and high calculated with the 25 indicators, then validated through consultative process.
UNFPA	<ul style="list-style-type: none"> - UNFPA PSEAH efforts are guided by a coherent regulatory framework of policy documents and complementary resources. UNFPA adheres to the Secretary-General Bulletin on sexual exploitation and abuse, applicable to all UN staff (ST/SGB/2003/13). - Additionally, UNFPA has a dedicated policy on the Prohibition of harassment, sexual 	<ul style="list-style-type: none"> - UNFPA has a multipronged, victim-centered strategy to effectively prevent and respond to sexual misconduct. - The strategy focuses on measures under three key objectives: prevention, response, and assistance. - In January 2021, UNFAP Executive Director, Dr. Natalia Kanem assumed the Inter-Agency 	<ul style="list-style-type: none"> - Any form of sexual exploitation and abuse and sexual harassment is prohibited, constitutes wrongdoing and will be addressed as a matter of priority by UNFPA. - UNFPA personnel are obligated to report allegations of sexual exploitation and abuse to the Office of Audit and Investigation Services through the confidential reporting tools available here, including an online reporting 	<ul style="list-style-type: none"> - In 2020 UNFPA implemented the United Nations Protocol on the Provision of Assistance to Victims of Sexual Exploitation and Abuse which aims to elaborate a common set of norms and standards to strengthen a coordinated, system-wide approach to the provision of assistance and support, prioritizing the rights and dignity of victims. 	<p>Several layers of assessment that are part of the RM FW:</p> <ul style="list-style-type: none"> - 1. Operational risk assessments of implementing partners (tools and guidance available). - 2. Risk assessment when establishing country program, SEA risks are integrated into the overall risk assessment including as part of social and environmental risks. It is a mandatory risk to be assessed when issuing country programs. - 3. PSEA FP when they operate in PSEA networks at the UN country team level also

	<p>harassment, abuse of authority and discrimination.</p> <p>-The UNFPA Oversight Policy embodies the principle of zero tolerance for wrongdoing, including sexual exploitation and abuse and sexual harassment. In addition, the Policy on Protection against Retaliation sets forth a framework and a procedure for the protection of UNFPA personnel from retaliation.</p> <p>- PSEAH Senior Coordinator role at P5-level created in 2018, sits under the Deputy Executive Director for programmes (DED). - An additional P4-level position recently appointed.</p>	<p>Standing Committee (IASC) Championship on PSEAH.</p>	<p>form available in five of the official UN languages.</p> <p>- There are SOPs in place for investigations and when there is an allegation that is credible enough, it is shared with Sr Coordinator so that risk mitigation tools / measures can be identified.</p>	<p>- Common reporting channels which are not formalized includes disclosures to health staffs (midwives), any other UNFPA personnel and/or partners.</p> <p>- When there are SEA cases - investigators would try to get in touch with the person concerned, to ask if survivor want to file a formal complaint.</p> <p>- Investigators explain the process, including the types of assistance that can be provided (medical, legal, psychosocial, or whatever else is desired).</p> <p>- PSEA FP may hear/receive allegations but it is not their primary role to receive allegations, FP may be helping with VA during investigations, using a survivor-centered</p>	<p>take part in interagency PSEA risk assessments.</p> <p>- The Regional FP oversee and review the risks registers (Excel sheet that examines risk areas, factors, causes, impact, internal controls, severity (after internal control), risks response, action owner) are produced at the country level.</p> <p>- Technical guidance available for country program on the SEA risk register, key questions for SEA situation analysis, examples of SEA risks, and internal controls and risks responses, etc.).</p>
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	<ul style="list-style-type: none"> - Considering 2 to 3 fixed-term PSEA post (roving). - Sr coordinator role covers prevention, response, coordination, and capacity building. - Monitoring framework includes reporting to the Executive Director on policy compliance indicators for Business Units and CO, as well as cross-checking data on reported cases with the Office of Audit and Investigations services, and completion of mandatory trainings. - Network of SEA FP (one FP + an alternate) appointed in each Business Units and CO. <i>Internally</i> they support the implementation in the agency FW on PSEA, <i>externally</i> they sit in PSEA network (when 			<p>approach. They help with communications and keeping the survivor informed about the process.</p> <ul style="list-style-type: none"> - Victims of SEA are able to access assistance through GBV services. When no services are available may have to identify financial resources. - All people working for UNFPA now have access to counselling services through the Employee Assistance Program (EAP), the Rome Institute, as well as regional staff care specialists. - Additional support and resources have been made available to personnel who need assistance with intimate partner violence. 	
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	<p>in place) and/or may act as IA coordinator.</p> <p>- For SH, they are looking at establishing a network of “respectful workplace adviser” who would be working directly with the Ombudsperson, to assist personnel through early intervention in appropriate cases. The programme is currently being piloted in 12 countries.</p>				
UNICEF	<p>- UNICEF prohibits sexual exploitation and abuse, applying the Secretary-General’s Bulletin on Sexual Exploitation and Sexual Abuse (ST/SGB/2003/13) and the Inter-Agency Standing Committee’s Six Core Principles.</p> <p>UNICEF Strategy to Prevent and Respond to Sexual Exploitation and</p>	<p>- Recognising the difference between SEA and SH, UNICEF 2019 Strategy covers both SEA and SH, bringing them together in a way that is mutually reinforcing and that creates opportunities to leverage practices between the two.</p>	<p>- All UNICEF personnel have a duty to report alleged incidents of SEA and shall not be retaliated against for complying with this duty.</p> <p>- When staff is aware of credible information regarding an alleged incident of sexual exploitation or abuse, report can be made directly or through head of</p>	<p>- For SEA, the United Nations Protocol on the Provision of Assistance to Victims of Sexual Exploitation and Abuse contribute to guiding the consistent delivery of VA.</p> <p>- Victims of SEA can access assistance through CP and GBV programs. Some immediate action for safety can be decided</p>	<p>Two layers of assessment that are part of the RM FW:</p> <p>- 1. Operational risk assessments of implementing partners (PSEA Assessment and Toolkit for CSO partners).</p> <p>- 2. Programmatic and operational risk assessment when establishing country program, SEA risks are integrated into the overall safeguard risk assessment, however the organization is</p>

	<p>Abuse and Sexual Harassment was launched in 2019 with 5 goals :</p> <ul style="list-style-type: none"> - 1) Organizational Culture of Zero Tolerance - 2) Reporting mechanisms that are safe and trusted - 3) Swift and Credible Investigations and Sanctions -4) Survivor-centered Response -5) Engaging partners in the fight against SEA and SH. <p>-SEA is embedded under safeguarding. There are 2 staffs, one Senior advisor for Safeguarding and 1 Safeguarding manager.</p> <p>- Sr advisor role includes mainstreaming safeguarding within UNICEF programmatic areas. SH is not covered under this position, it is separated and under</p>	<ul style="list-style-type: none"> - A new safeguarding policy has been developed (old one from 2016) that articulates UNICEF approach to SEA, from a special duty of care for children to “making UNICEF safe for everyone”. - This approach helps moving in a direction where PSEA is not just the sole responsibility of few, nor just a protection issue but it is an operational and programmatic responsibility across the organization. - Under this framework, addressing PSEA does not require solely a legalistic regulatory approach but is rather envisaged as being part the culture and values of the organization. 	<p>office to UNICEF’s Office of Internal Audit and Investigations by emailing integrity1@unicef.org.</p> <ul style="list-style-type: none"> - The Office of Internal Audit and Investigations (OIAI) conducts investigations that involve UNICEF staff, consultants, non-staff personnel and institutional contractors. - OIAI’s investigations cover all forms of misconduct including, but not limited to : fraud; corruption; workplace harassment; sexual harassment; sexual exploitation and abuse; abuse of authority; or failure to observe prescribed regulations, rules, relevant administrative issuances and standards of conduct. - The Ethics Office is an independent office that receives and conducts the primary review of 	<p>upon cases circumstances.</p> <ul style="list-style-type: none"> - UNICEF has worked with the Office of the VRA and OHCHR to improve legal assistance available to victims (inc. roster of lawyers and/or legal aid organizations willing to offer pro bono legal aid). - For SH, UNICEF is equally committed to providing comprehensive support and assistance to staff who experience sexual harassment including confidential ethical advice and guidance; protection from retaliation; counselling; mediation or alternative dispute resolution; medical services; and security support. 	<p>looking at simplifying its approach.</p> <ul style="list-style-type: none"> - Identification and effective management of safeguarding risks is included as an indicator in UNICEF strategic plan.
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	<p>other units (internal culture, legal affairs).</p>	<p>- From September 2018 to September 2019, UNICEF Executive Director Henrietta Fore served as the Inter-Agency Standing Committee “Champion” on Protection from Sexual Exploitation and Abuse, and Sexual Harassment. In this capacity, she focused her agenda on strengthening the country-level systems for SEA prevention and response.</p>	<p>protection against retaliation (whistle-blower protection) and provides confidential advice and guidance on ethics matters related to UNICEF.</p>		
<p>World Food Program</p>	<p>- The approach to PSEA puts the victims at the center and is rooted in the the Secretary-General’s Bulletin on Sexual Exploitation and Sexual Abuse (ST/SGB/2003/13) that defines SEA as ‘acts of gross misconduct’ constituting grounds for termination of employment.</p>	<p>- WFP approaches PSEA in a holistic manner, based on the premise that preventing sexual exploitation and abuse means more than having the right policies in place.</p> <p>- For PSEA efforts to be most impactful and effective, WFP mainstreams PSEA</p>	<p>- WFP has a zero-tolerance policy for SEA. This applies to all WFP employees (regardless of contract type of duration), and all WFP partners, suppliers, contract workers and external services providers.</p> <p>- All WFP personnel have a duty to report SEA including behaviors both away from the workplace,</p>	<p>- WFP takes a victim-centered approach to its prevention and protection measures against SEA.</p> <p>- WFP seeks to ensure that victims are provided with support, as needed, at the same time as reports are investigated.</p> <p>- The organization relies on protection partners</p>	<p>Several layers of assessment that are part of the RM FW:</p> <p>- 1. RM under the responsibility of country directors (short self-assessment reviewed on a yearly basis).</p> <p>- 2. Partners through the capacity assessment process (see: tools available at the UN portal).</p>

	<p>- The prevention of SEA is mainstreamed throughout the organization and its operations and is incorporated in WFP legal framework.</p> <p>- Key pillars of the approach include:</p> <ul style="list-style-type: none"> -1) Capacity strengthening -2) Integration of prevention and protection -3) Interagency and donor engagement -4) Reporting SEA -5) Victim-centered approach -6) Covid-19 adaptation <p>- PSEA is under the responsibility of WFP Ethic office with, since 2018, a PSEA Senior Advisor who supports the implementation of the prevention framework including through a network of 300 PSEA FP – at min at P4 managerial/thematic</p>	<p>concepts, principles and best practices into operations, core learning modules and tools.</p> <p>- WFP also supports at innovative projects (such as PSEA digitalization project that explore digital solutions for referrals of SEA victims).</p>	<p>and during or outside hours.</p> <p>-All reports are confidential and can be made anonymously to WFP’s internal investigations unit, the Office of the Inspector General - OIG, or PSEA Focal Points (who refer matters to OIG) by accessing this link.</p>	<p>and strong local referral networks for direct assistance for victims of sexual exploitation and abuse, and also collaborates with the UN Victims’ Rights Advocate.</p>	
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	<p>expert level - located in all Regional Bureaus, Country offices and field offices with significant staff presence.</p> <ul style="list-style-type: none">- SH falls under HR.- PSEA FP are tasked with supporting prevention, including raising awareness among employees and partners, and receiving reports of SEA from victims for referral to WFP's internal investigations (Office of Inspections and Investigations).				
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<p>UNHCR</p>	<p>- PSEAH Sr Coordinator appointed in 2018 by the High Commissioner.</p> <p>- Reports to the Deputy High Commissioner who chairs the TF on SEA and SH with Director-level membership across the Organization and received support from a working group.</p> <p>- A clear vision, strategy and action plan were developed and are taken forward by the Senior Coordinator (SEA and SH) with 4 pillars:</p> <p>-1) Ensure that an end-to-end victim-centered approach is streamlined in all UNHCR practices and procedures concerning sexual misconduct.</p>	<p>- Dedicated capacity and coordination structure focusing on both SEA and SH. This decision recognizes the common roots of these abuses (power differentials and gender inequalities), as well as the similar needs of victims of all forms of sexual misconduct.</p> <p>- As the 2020 Inter-Agency Standing Committee (IASC) Champion on PSEAH, High Commissioner Filippo Grandi outlined three main priority areas to deliver on during his tenure: Bolstering Prevention, Expanding Safe Spaces, and Promoting Respectful Use of Authority.</p>	<p>- UNHCR has reinforced mechanisms to ensure that cases of SEA are reported, using a range of complaints mechanisms, including face to face engagement, mobile phone technology and call centres.</p> <p>- UNHCR's Inspector General's Office is responsible for investigating allegations of misconduct that involve people or entities with a direct contractual link with UNHCR.</p> <p>- Report of misconduct can be done on the following link.</p> <p>- In addition, the SpeakUp! Helpline is a confidential independent helpline available to UNHCR colleagues who wish to report misconduct or obtain advice on what to do when in doubt. The</p>	<p>- In 2020, UNHCR issued a Policy on a Victim-Centred Approach in UNHCR's response to Sexual Misconduct that focuses on ensuring the safety, rights, well-being and expressed needs and choices of victims/ survivors when responding to sexual misconduct.</p> <p>- Victims of SEA receive multi-sectoral support through GBV and CP. SOPs are in place at the field level, in camps and urban settings, to ensure the safety of victims who report abuse and to guide their safe referral to services such as legal, medical, and psychosocial support.</p> <p>- Victims of sexual harassment are supported by UNHCR's Victim Care Officer.</p>	<p>- UNHCR Emergency Handbook contains guidance and tools to support comprehensive risk assessment, including a situation risk assessment of the operational context during the planning phase, and to conduct periodic sectoral risk assessments.</p> <p>- UNHCR's country offices also guide partners through the capacity assessment process (see: tools available at the UN portal).</p>
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	<p>-2) Equip and empower UNHCR and partner personnel to prevent, identify and respond to sexual misconduct.</p> <p>-3) Uphold organizational accountability in tackling sexual misconduct.</p> <p>-4) Maintain UNHCR's role as a key stakeholder engaging in interagency efforts.</p> <p>- UNHCR's policy on Protection against Retaliation includes all UNHCR personnel, has a wide scope of protected activities and allows for the extension of the timelines to request protection.</p> <p>- UNHCR has a network of 400 PSEA focal points (across 132 countries) with specific responsibilities related to the prevention of SEA, including helping</p>		<p>helpline is managed by an external provider and is available 24/7 by phone, through a web form and a mobile application. It offers the possibility to report in complete anonymity.</p> <p>- UNHCR staff may also contact the Victim Care Officer as the first port-of-call in relation to concerns over sexual harassment.</p>		
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	<p>refugee-victims access support resources as well as through carrying out training and awareness-raising activities.</p> <p>- UNHCR's global network of 400 peer advisors also provides critical support in the context of harassment, particularly in preventing and mitigating tensions and grievances, supporting colleagues, and promoting better workplaces.</p>				
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ANNEX B – DETAILED BREAKDOWN OF PSEA-DEDICATED STAFF POSITIONS (RECENTLY RECRUITED & PLANNED)

REGION	COUNTRY OFFICE	DEDICATED PSEA OFFICERS (AS OF APR. 2022)		DEDICATED PSEA OFFICERS PLANNED		Total by end of 2022	FUNDING SOURCES										
		IOM	IA	IOM	IA		USRAP	GHAP	CAN	UK	AUS	NDL	US	Other donors	OSI	Core/Admin	
AFRICA (15)	Burundi			1		1	100%										
	Cameroon			1		1		50%	50%								
	Democratic Republic of Congo			1		1		100%									
	Ethiopia			2		2		100%	100%								
	Ghana			1		1		100%									
	Kenya	1				2	50%	50%	100%								
	Mozambique			2		2							200%				
	Nigeria*			2		2		200%									
	Rwanda			1		1			100%								
	South Africa			1		1		100%									
	South Sudan			1		1								50%	100%		
	Sudan			1		1			100%								
	Uganda			1		1	50%	50%									
	United Republic of Tanzania			1		1	100%										

	Zimbabwe			1	1		100%									
ASIA (8)	Bangladesh			1	1		100%						100%			
	Iran			1	1				100%							
	Nepal			1	1		100%									
	Pakistan			2	2	50%	50%		100%							
	Philippines			2	2		100%						100%			
	Sri Lanka			1	1		100%									
	Thailand (supporting Malaysia)			1	1	50%	50%									
	Viet Nam			1	1		100%									
EUROPE & CENTRAL ASIA (8)	Greece			1	1									100%		
	Hungary	1			1									100%		
	Moldova	1			1									100%		
	Poland	1		1	2									200%		
	Romania	1			1									100%		
	Slovakia	1			1									100%		
	Tajikistan			1	1				100%							
	Ukraine	4			4	100%								300%		
	Egypt			1	1	50%		50%								
MENA (7)	Iraq			2	1				100%							
	Jordan			1	2	50%	50%							100%		
	Lebanon			1	1				100%							
	Qatar			1	1	100%										
	Turkey			1	1	100%										
	Syria based in Turkey, Gaziantep		1			1								500%		

	El Salvador (supporting Guatemala)			1	1	100%										
Global (1)	Global PSEAH Team	3		1	4	50%	50%				100%		100%		200%	
	Interagency PSEA Team		2		2							200%				

Table: Dedicated PSEA staffing over time in IOM – PSEA staffing to support IOM vs PSEA staffing to support the interagency

IOM	INTERAGENCY	IOM	INTERAGENCY	IOM	INTERAGENCY	TOTAL
3.5	8	10	1	39	0	61.5
Staffing as of Apr 22		RECENTLY HIRED		PROPOSED by Dec 22		

Table: Increase in PSEA staffing over time (IOM vs interagency)

	Apr 22	Increase	Dec-22
Interagency	8	(+1) 11.25%	9
IOM	3.5	(+49) 1500%	52.5
TOTAL			61.5

Table: Dedicated PSEA staffing within IOM HQ vs field and interagency HQ vs field

	IOM HQ	IOM Field	IA HQ	IA Field	TOTAL
International	4	5	2	3	14
National		43.5	0	4	47.5
TOTAL	4	48.5	2	7	61.5

ANNEX C – EXAMPLES OF POWERFUL PSEAH COMMUNICATIONS (UNFPA)



In today's Ethics Post, I share a UN Appeals Tribunal case involving a P4 staff member from Sudan who was fired for sexually harassing a UNV. I hope this serves as a warning to people in positions of power that it is never okay to exploit that power for your own sexual gratification.

To the men who are reading this now and thinking: "Men don't know how to act around women anymore" I say, when you're used to privilege, equality feels like oppression. If #metoo has made you self-conscious about what you say and do around your female colleagues, that is a good thing - we all have the obligation to monitor our conduct to ensure we are creating a psychologically safe environment for those around us. This applies in all arenas, including racism and discrimination in all its forms.

Women have, for too long, carried the psychological burden of extracting themselves from opaque workplace relationships with more powerful men. We are turning a corner. These are transformative times and I am proud to work for UNFPA, an organization that walks the talk on zero tolerance.

Leanne

Dear Leanne

Your Ethics post today is important reading for all of us as UNFPA staff.

I ask everyone to read the post and then discuss it widely, as part of upholding our 'Speak Up' culture.

UNFPA's commitment to zero tolerance for sexual harassment is a cornerstone of full equality and respect for women — and everyone — in the workspace.

Your explanations in the Ethics post and the details contained in the Tribunal case are helpful in increasing our understanding as staff, consultants, volunteers, interns, vendors, implementing partners and other associates of UNFPA, about the power dynamics involved in sexually harrassing behaviors and the duty and responsibility we all have to take action to prevent, interrupt and report such behaviors, whenever and wherever they may occur.

With thanks to you and the Ethics Office team.

**Saludos de
Natalia**

Dr. Natalia Kanem
Executive Director

UNFPA United Nations Population Fund

How Past Trauma Can Silence Your Voice: 3 min read

Inbox



Ethics Office 14:47
to ALL



There are many reasons people do not feel safe to report wrongdoing or engage in constructive dissent.

As an organization, we are working to create a culture where everyone feels safe to belong, contribute and speak up. However, there is one element of safety to speak up that is difficult for our organization to tackle - when the fear of speaking up is rooted in past trauma.

To learn more, click here: <https://sites.lumapps.com/a/unfpa/myunfpa/ls/community/ethics/post/4889761179107328>



Ethics Office 15:29
to ALL



Dear Colleagues,

This week we ran our first webinar on psychological safety for HQ personnel. We had 179 participants. Many shared of your shared your thoughts and experiences in the chat box; you said:

I spoke up a few times, but nothing happened, so now I don't do it anymore

I am made to feel like I am undermining authority when I speak up

I was punished when I spoke up: through my PAD or in other ways

It is harder for consultants to speak up because our positions/contracts are at stake

I reported to Ethics/Investigations/Ombudsman, and nothing happened

To learn more, click here: <https://sites.lumapps.com/a/unfpa/myunfpa/ls/community/ethics/post/6438062579908608>

Our Internal Justice System - Your Questions Answered

Inbox



Ethics Office 17:39

to ALL



Dear Colleagues,

All key actors in our internal justice system are coming together this week to answer your thorny questions/concerns/comments. Don't miss this first-of-a-kind event. **For more, click here:** <https://sites.lumapps.com/a/unfpa/myunfpa/ls/community/ethics/post/5403819691081728>



MEET THE INTEGRITY FAMILY
Please join us
18 Aug. 2022



ANNEX D — SUMMARY OF RECOMMENDATIONS

#	Recommendation	SH	SEA
Victim-Centered Approach			
4.9	<i>PSEAH Unit to have overall accountability for IOM’s victim-centered framework, a critical pillar of IOM’s internal justice system and overall PSEAH approach, including by housing a senior-level SVO position to support SEAH work.</i>	✓	✓
4.10	<i>The PSEAH Unit to actively support the development of IOM’s victim-centered approach at the cornerstone of its prevention and response framework, it should address: a) IOM’s vision, rationale and principles underpinning IOM’s victim-centered approach and how it will be operationalized internally within the Organization by the various relevant entities and concerned stakeholders. b) In collaboration with ECO, OIG, Security, LEG and DHRM, identify mechanisms that should be put in place to guarantee the security of SEAH survivors during and after investigations (long-term protection of victims). c) Working with OIG to develop a joint-information sharing protocol that addresses: -protocols for referring SEA reports from OIG to the PSEAH Unit to facilitate referrals to victim assistance services (at which point of the complaints handling, timeframes to do so, assistance referral points to be provided, etc.); - strengthened overview of SEA trends and patterns (number of cases opened per region, number of cases investigated per region, number of cases closed, whether SE or SA, gender, adult/minor, etc.). d) Supporting LEG and OIG in the development of a standardized approach to information sharing with SEAH survivors during investigations (case updates) and upon case-closure (outcomes of the process) in a way that is suitable to the needs of IOM beneficiaries (most which are populations on the move). These processes and protocols should be reflected in the forthcoming SEAH investigations SOPs. e) Defining funding for ensuring victims can access basic assistance and multi-sectoral services at the various levels and throughout the different stages of the complaints handling process, including establishing partnerships with GBV and Protection actors, and allocating funding for access to and availability of services.</i>	✓	✓
4.11	<i>Define minimum standards for the provision of services for victims of sexual harassment</i>	✓	
4.12	<i>Ensure that there are robust victim assistance referral SOPs in place within operations that explain who and how referrals will be performed, how IOM will work with the local Protection, GBV and CP sectors, or trigger providers of last resort, as applicable, as well as funding requirements to be provisioned to link victims to the appropriate multi-sectoral services.</i>	✓	✓
4.13	<i>Develop M&E framework to assess implementation of IOM’s victim-centered approach, conduct periodic reviews and iterate, as required.</i>	✓	✓
Risk Management			

1.5; 4.1 and 7.6	<p><i>Strengthen efforts to promote safer programming:</i></p> <p><i>a) Develop and roll-out of a robust yet easy-to-deploy risk analysis, prioritization and mitigation framework, suitable to the realities and capacities of IOM;</i></p> <p><i>b) Ensure that the framework is consistently used to inform operations and programming;</i></p> <p><i>c) Ensure that IOM has the necessary human, financial and technical capacity to consistently implement the framework – this may involve training staff or recruiting additional capacity if needed;</i></p> <p><i>d) Widely disseminated risk analysis associated products to enhance the PSEA knowledge base and inform global approaches.</i></p>		✓
3.2	<p><i>If more consistently employing a risk-informed approach to operations and programming, IOM can use its own experiences to enrich the global PSEA knowledge base and inform the work of others. This would not only help to strengthen safer programming practices but also solidify IOM’s credibility vis à vis donors and peer organizations.</i></p>		✓
Policies linked to PSEAH			
1.1.	<p><i>Bring the voices of affected populations, and needs and priorities of victims, to the center of discussions; ensure these are used to guide decision-making, especially in policy revision processes.</i></p>	✓	✓
1.2.	<p><i>Enhance IN/90 Rev.1 in a potential follow-up update or in the roll-out of the guidelines:</i></p> <p><i>a) Ensure IN/90 Rev. 1 is consistent with IOM’s overarching vision and commitments to the prevention, mitigation and response to sexual harassment risks, with specific reference to “IOM’s Strategic Approach Toward the Prevention and Response to Sexual Exploitation and Abuse and Sexual Harassment”, including its five priority areas;</i></p> <p><i>b) Introduce and clarify roles and responsibilities of the PSEAH Senior Coordinator and PSEAH Unit, as well as any other relevant operational-level staff that support sexual harassment prevention and response efforts;</i></p> <p><i>c) Address the specific the differential nature of sexual harassment vis-à-vis other types of abusive or inappropriate behaviour in the workplace;</i></p> <p><i>d) Introduce IOM’s vision, guiding principles and operationalization of IOM’s victim-centered approach to prevention and response to sexual harassment;</i></p> <p><i>e) Introduce gender-sensitive considerations guiding the provision of informal assistance in cases of sexual harassment;</i></p> <p><i>f) Establish links and develop specific technical guidance to inform and support the collective delivery of IOM’s approach on sexual harassment</i></p>	✓	
1.3.	<p><i>For IN/234, IOM should consider reflecting the following recommendations in the revised policy or accompanying guidance:</i></p> <p><i>a) Align the PSEA Policy with IOM’s overarching vision and commitments to the prevention, mitigation and response to SEA risks with reference to IOM’s Strategic Approach Toward the Prevention and Response to Sexual Exploitation and Abuse and Sexual Harassment (5 priority areas);</i></p> <p><i>b) Adoption of a broader statement prohibiting sexual relationships with beneficiaries, unless otherwise previously disclosed to the Ethics and Conduct Office; IOM’s Relatives in the Workplace form, already in use, can be updated to clearly address this requirement.</i></p>		✓

	<p>d) Introduce of IOM vision, guiding principles and operationalization of IOM victim-centered approach in complement to the PSEA Policy, for an example, definition of the victim-centered approach and the rationale for adopting a victim-centered approach to guide the organization's response to sexual misconduct.</p> <p>e) Introduce and outline the risk-informed approach and how it will be operationalized to guide decision-making on PSEA prevention and response;</p> <p>Clarify and ensure coherence and complementarity between the PSEA Policy and other IOM instructions (IN/90 Rev. 182, IN/28283, IN/27584);</p> <p>f) Establish linkages with specific, detailed technical guidance to support the joint operationalization of IOM's vision and commitments on PSEAH.</p> <p>g) Revise the application and policy operationalization to cover IPs, TPCs and service providers including: mandatory PSEA IP capacity assessment to be roll out through a phased approach to reflect any identified change in policy and practice; and to outline considerations on potential support and oversight by OIG of investigation of cases involving TPC staff as alleged perpetrators, to accompany developments already happening across wider UN-system entities.</p> <p>h) Reflect IOM's obligations towards information sharing on SEA allegations with RC/HCs.</p>		
1.4	Under the steer of senior leadership, use the revision of IN/234 (and potential future revisions of IN/90 Rev 1 and corresponding guidance) as an opportunity to address critical gaps in internal coherence. Explore option of using PSEAH HQ Task Force as forum for hosting policy discussions.	√	√
3.1, 4.15	Set milestones and timelines for resolving IOM's position on the adoption of UN/international norms standards, and moving forward with any necessary subsequent institutional/policy reforms. Some specific issues requiring urgent positioning are: a) Systematic sharing non-identifying case information on SEA with RCs/HCs, as IOM is one of the only UN entities presently not providing this information; b) Mandatory IP capacity assessments, which can be initiated through a phased approach that would make it an internal requirement for high-risk programmes and operations as a first step.		√
PSEAH Governance Structure			
2.1	Clarify, and communicate more strategically, the PSEAH unit's role and responsibilities, including PSEAH domains that fall under its responsibility (e.g.: the victim-centered approach) and those areas that it currently does not have the capacity to lead on (e.g.: child safeguarding issues).	√	√
2.2	Make the PSEAH Task Force more results-oriented; leverage it as the collective forum for producing joint deliverables, and enhance PSEA integration across programmes and other relevant policy areas. It should meet more regularly; have a workplan that articulates tangible deliverables, and corresponding responsibilities, targets and timelines; be co-chaired by DDGs Pope and Daniels, alternately.	√	√
PSEAH Strengthening within IPs, TPCs and Service Providers			

1.6 and 4.15	<p>Implement a more consistent approach to working with TPCs from procurement and contracting to onboarding of staff, and throughout the time TPC staff are serving within IOM operations. This includes:</p> <p>a) Exploring avenues for enabling TPCs to join the "Misconduct Disclosure Scheme" as a complementary alternative to UN ClearCheck or, alternatively, establish a directive for TPCs to share names of potential new hires with IOM DHR so that IOM can run checks on their behalf.</p> <p>c) Ensuring more diligent implementation and monitoring of onboarding requirements;</p> <p>d) Customizing PSEA training and awareness to IOM and translated into local languages, and ensuring these are tailored to the audience group (guards, administrative staff, etc.)</p> <p>e) Take the necessary steps to ensure TPCs' investigations capacity are on par with international/IOM's standards to guarantee that, while not covered by IOM's internal justice system, the same accountability threshold can be maintained across all workers. The capacity to meet these standards should be part of the procurement due diligence process when selecting a TPC, to ensure they have the capacity to conduct an investigation from the start. Additionally, OIG should develop a simple checklist to support an assessment of whether the TPC has appropriate standards and investigation capacity in place.</p>	✓	✓
4.15	Establish a timeline and targets for making IP capacity assessments mandatory across all operations; the process can be phased and strategically rolled out in line with the risk-informed approach,		✓
4.16	Strengthen PSEA efforts to more systematically target volunteers and daily workers. For volunteers, IOM should consider establishing its own vetting system or, in contexts where there is strong government capacity, advocate for the establishment of national vetting systems.		✓
UN and Interagency Coordination and Partnerships			
3.4	Continue to be an active and strong supporter of PSEA inter-agency efforts at global regional levels. Institutional resolve on unsettled policy issues (e.g.: inter-agency information sharing, use of the UN Incident Reporting Form, etc.) will help make IOM's position clearer on these issues and support more strategic engagement of IOM staff in inter-agency fora, solidifying IOM's position in these platforms. Hence the urgency in moving forward with these discussions at HQ-level.		✓
3.5	Potential future revisions of existing MOUs signed with UNICEF and UNFPA should be expanded to reflect the role of these entities as providers of last resort. In parallel, guidance should be provided to missions on how to activate external partnerships for victim assistance in settings where providers of last resort (UNICEF and UNFPA) may need to be triggered		✓
3.6.	Continue moving forward with prevention of sexual harassment efforts within IOM and externally through inter-agency platforms, as new co-chair of the workstream on prevention and behaviour change within the UN Chief Executive Board on Sexual Harassment.	✓	
Sexual Harassment			
4.3a	Enhance messaging to clarify and emphasize to staff on: 1) differences between SEA and SH, and which carry mandatory reporting obligations; 2) options and services available for SH victims, including implications of opting for formal versus informal resolution avenues.	✓	✓

4.3.b	<i>Clarify the role of key HQ departments and mission-level staff (CoM, Security and DHRM, PSEA and Respectful Work Environment Focal Points); establish protocols anchored in the need-to-know principle for safely and timely escalating the sharing of information in the event of risk and threats of retaliation (when? how? who?).</i>	✓	✓
4.3.c	<i>Produce practical guidance, tailored to each relevant mission-level staff on role and responsibilities in the event of sexual harassment case (e.g.: what should be prioritized, what is expected from each actor receiving the complaint, etc.); a concise, practical document in the form of a "decision tree" that also contains basic information on "do's and don'ts", building from examples and good practices from the GBV sector.</i>	✓	
4.3d	<i>Given that IN/go rev 1 has been launched, train Manila DHRM and Office of Staff Security staff on aspects related to sexual harassment.</i>	✓	
4.4	<i>Roll out and sustain the soon to be launched communication campaign on the Prevention of Sexual Harassment, and foster opportunities for bringing attention to the issue (e.g: creating dialogues with colleagues on the issue, delivering and supporting dedicated training, integrating sexual harassment as a topic in wider communication and training materials, etc).</i>	✓	
PSEA Programme Strengthening			
2.4.	<i>Draw more systematically on lessons-learned and best practices from IOM DOE's PRM-funded Safe from the Start/GBViC Institutional Capacity Building project and IOM's own accumulated experience integrating GBV into non-Protection-specialized sectors.</i>		✓
3.3.	<i>Invest more in Protection/GBV dedicated programming especially in high-risk operational contexts. This will also contribute to expanding IOM's capacity to deliver victim assistance services, making use of its own Protection/GBV programming and filling critical gaps in contexts where such services are not available.</i>		✓
5.8	<i>Leverage newly-established PSEA positions with the various resettlement programmes and GHAP to support PSEA efforts across IOM's wider projects and programmes, etc. Programmes should be open to pooling and sharing resources and not operate in a siloed manner.</i>		✓
7.7	<i>Establish more systematic lines of communication between the PSEAH Unit and programmes and policy units within HQ, so as to strengthen institutionalization of PSEA. DDG Daniels to co-chair some PSEA TF meetings, alternating with DDG Pope Similar to DDG Pope, regular, periodic briefing sessions between the Senior PSEAH Global Coordinator and DDG Daniels should also be established.</i>		✓
7.8	<i>PSEA integration in IOM's institutional handbooks, guidance and frameworks, such as PSEA inclusion in IOM's Project Handbook and PRIMA; develop guidance on integrating PSEAH risk into needs assessments.</i>		✓
7.9	<i>Establish and institutionalize minimum requirements for PSEA in L3 emergencies.</i>		✓
Strategic Communications (internally)			
4.2a	<i>Leadership should make more strategic use of communications disseminated to all staff to continue to raise awareness on PSEAH and demonstrate IOM's commitment to the issue to ensure it remains high in the agenda and momentum is not lost. Powerful messaging should be used to deconstruct fear of reporting, widespread perception of impunity, showcase efforts, highlight best practices, etc.</i>	✓	✓
4.2.b	<i>Communications from the PSEAH Unit to the network of dedicated-PSEA staff/Focal Points should be more regular and predictable. It ensures field staff are informed of HQ-level ongoing and planned work, especially on any new guidance to be rolled-out, latest</i>		✓

	<i>organization-wide PSEAH developments, and is also used as a vehicle to solicit inputs on specific deliverables to strengthen two-way communication and keep the Network motivated. A periodic newsletter (concise email) to the Network should be circulated and regular "Questions & Answers" webinars should be organized. Moreover, a PSEAH community of practice should be articulated, for example, through a Yammer group or other fora promoting interaction among staff by encouraging the sharing of ideas, updates, questions, tools, etc.</i>		
6.1	<i>Speak with one voice and avoid jargon to explain and disseminate IOM PSEAH vision, guiding principles, objectives and processes, so that IOM staff can better understand the complaints handling process, services they can access, the implications of reporting, how information will be handled, timelines, when status update on process can be expected, etc.</i>	√	√
6.4	<i>Increase transparency and trust by communicating widely the results of IOM's PSEAH efforts, including, but not limited to, disciplinary measures taken against abusers in a safe and confidential manner – trends, patterns, percentages, etc. IOM existing communications on SEAH should be revised to be more digestible, audience-tailored and strategically packaged to help to deconstruct crystalized perceptions of impunity among IOM staff and foster behaviour change among staff.</i>	√	√
6.5.	<i>Amplify communications through the use of multiple channels to share success stories and achievements on PSEAH – e.g.: ending impunity of abusers, highlighting IOM's agents of change, impactful sensitization of affected populations on SEA, etc.</i>	√	√
Reporting and Complaints Handling			
4.5	<i>Update IOM reporting platform/form to: a) Include all basic information required to facilitate and expedite intake and the initial assessment, and addresses minimum victim assistance information requirements to enable referrals, including by OIG if not yet done at the point of receiving the complaint from the field (e.g.: the form could include a box that can be ticked to confirm that the victim has already been referred) c) Include a mechanism enabling regular, confidential and anonymous, communication between the lead investigator within OIG and the individual submitting the report (either PSEA Focal point/dedicated-PSEA staff, victim or other) to facilitate the collection of any additional required information and the sharing of case status updates. Note that this feature would also help make the platform attuned to the needs of mobile populations.</i>	√	√
4.6	<i>Develop practical, detailed guidance on how to safely and confidentiality transfer SEA reports received through local complaints and feedback mechanisms to the WAAI platform, addressing minimum victim assistance information requirements to enable follow-up referrals (if not done at the point of receiving the complaint). The guidance should account for resource, expertise and staffing structure differentials within IOM offices (e.g.: if the mission has Protection expertise/capacity, etc.)</i>		√
4.7	<i>Invest in greater AAP technical capacity and programmes and operations should commit more efforts to identifying, jointly with affected populations, especially women and girls, preferences around safe, accessible and appropriate reporting channels for SEA, and on how to effectively communicate with beneficiaries and affected populations on PSEA. Examples, tools and best practices should be widely disseminated within IOM programmes and operations.</i>		√
Investigations			

5.4	<i>Physical decentralization to increase field office presence and expansion of OIG's human resources to reflect diverse technical and language capacities are recommended to ensure it is able to more effectively and timely respond to, and meet requirements of, survivor-centered investigations.</i>	✓	✓
4.8	<i>While respecting OIG's independence and confidentiality, more transparency and coordination between OIG and other units is should be fostered to clarify OIG's internal processes. Circulate the investigation SOPs being developed by OIG for within the PSEAH Task Force for comments</i>	✓	✓
Monitoring, Evaluation & Learning			
6.2.	<i>Establish a robust, overarching M&E framework that captures PSEAH collective results against targets set within its strategic plan. A system of feedback should also be established for learning from specific cases so that the Organization can continuously improve approaches to strengthen its approach to PSEAH.</i>	✓	✓
6.3	<i>Move beyond process indicators towards robust measurements that are able to capture accountability and impact. Monitoring, evaluation and learning frameworks, and corresponding indicators should capture changes in organizational and staff attitudes and behavior. For example, "thermometer" surveys can be periodically implemented to monitor perceptions, trust, knowledge, etc. among IOM staff and, especially, senior leadership</i>	✓	✓
Guidance & Capacity Development			
1.7	<i>Expand technical expertise, resources, guidance and develop approaches that are fit for purpose for children and people with diverse SOGISEC.</i>	✓	✓
3.6	<i>Short guidance or technical note should be issued outlining key PSEA issues to consider when working with governments.</i>		✓
5.10	<i>PSEAH Unit should continue to encourage a more deliberate, conscientious nomination of PSEA Focal Points by CoMs to ensure nominated staff meet the requirements of the role (see related recommendation below on PSEAH training for CoMs), possibly integrating messaging around this into training and capacity building initiatives targeting CoMs.</i>		✓
5.12	<i>Ensure key PSEAH-related policies, guidance and technical resources are translated, at a minimum, into French, Arabic and Spanish.</i>	✓	✓
5.13	<i>Expedite the development and roll out a training (or induction package) for PSEA Focal Points and dedicated PSEA Officers</i>		✓
5.14	<i>Building on the PSEAH Toolkit and Checklist, provide audience-tailored PSEAH training to senior leadership, particularly CoMs to clarify expectations, roles and responsibilities, as well as outline the key actions to take there be a case of SEA or sexual harassment within their respective mission, how to respond to media enquires, etc.</i>	✓	✓
5.15	<i>Foster "culture change" within the Organization by building of capacity of CoMs, Project Managers, Project Development Officers, M&E Officers, Crisis Coordinators, etc. to ensure that all play a role in embedding PSEA in programming and management.</i>		✓
PSEAH Human & Technical Resources			
5.1	<i>The PSEAH Unit staffing levels to be significantly expanded</i>	✓	✓

5.2	<i>A senior P5-level Victim Care Officer position, within the PSEAH Unit, is urgently needed to drive victim-centered approach efforts forward. Establishing a senior-level position (P5+) is key, as it demonstrates IOM's strong commitment to putting the needs and priorities of victims at the center of its PSEAH efforts and would be appreciated by donors (it would be the most senior level position of this kind among all UN-system entities).</i>	✓	✓
5.3.	<i>Consider creating a flexible, roving team of PSEA experts that can provide targeted support to strengthen PSEA efforts within missions. A dedicated PSEA institutional capacity-building project would greatly facilitate such efforts. Create a roster of existing experts that they could tap into.</i>		✓
5.5	<i>Office of the Ombudsperson should continue to decentralize</i>	✓	
5.6	<i>HRM should consider any additional resources required at HQ and RO levels or viable alternatives, such as service outsourcing, to cope with mandatory UN ClearCheck and other PSEAH-related requirements</i>	✓	✓
5.7	<i>LEG should consider any additional resources required at the HQ-level to support the team with PSEAH related tasks</i>	✓	✓
5.9	<i>Rapidly increase the number of dedicated, full-time, PSEA positions at both RO and CO levels, deployed strategically in line with a risk-informed approach. At RO level, dedicated staff is vital, as these staff can support a portfolio of programmes and countries in strengthening PSEA efforts.</i>		✓
5.11	<i>Collaborate with the Office of the Ombudsperson to find ways to promote more systematic engagement and synergies between PSEAH and Respectful Work Environment Focal Points at the mission-level. This is critical for strengthening sexual harassment efforts within IOM Country Offices, since SH is not included in the ToRs of PSEA Focal Points. Basic guidance can be incorporated into the PSEAH Toolkit and Checklist on how these two key office resources can better work together.</i>	✓	
Funding			
7.1	<i>Ensure more predictable funding is mobilized and allocated to PSEAH within the Organization.</i>	✓	✓
7.2	<i>Rely on a diversified funding strategy that taps into multiple sources: core funding from IOM's central budget (whenever possible); earmarked funding from IGF, MiRAC or similar; dedicated budget lines within wider programming budgets; as well as dedicated PSEAH projects.</i>	✓	✓
7.3	<i>In operations where IOM is delivering both development and humanitarian programmes, PSEA positions can be attached to long-term projects and programming to ensure sustainability but mobilized to support PSEA efforts across multiple types of programmes.</i>		✓
7.4	<i>Institutionalize the requirement for inclusion of dedicated PSEA budget lines to ensure adequate PSEA staffing and activities within project proposals and that a portion of resources be allocated to support core, cross-cutting PSEA staffing and activities would be required.</i>		✓
7.5	<i>Continue to explore synergies with IOM's IGF. A major opportunity lies in leveraging the IGF to fund the Survivor Care Officer position within the PSEAH unit.</i>	✓	✓

ANNEX E— EVALUATION QUESTIONS & DIMENSIONS OF INQUIRY

QUESTIONS & DIMENSIONS OF INQUIRY EXPLORED IN THE ANALYSIS	
Evaluation Questions	Dimensions of Inquiry
1. Relevance	
1A. To what extent is IOM's approach to PSEAH fit-for-purpose taking into account IOM's strategic vision, global workforce, reach (global footprint), scope (types of programming across humanitarian, development, transition settings) and operating model (highly operational, direct implementation)?	<ul style="list-style-type: none"> - Degree of alignment of IOM policy on PSEAH with IOM Strategic vision and other relevant framework (IOM Strategic result framework), and overarching framework (Sustainable Development Goals (SDGs) and the Global Compact for Safe, Orderly and Regular Migration (GCM). - Centralization of PSEAH capacities vis à vis needs of COs and ROs - Adaptable approach to Risk management/mitigation
1B. To what extent is the PSEAH approach responsive to beneficiaries needs and priorities (IOM global, regional and country teams, implementing partners, affected population)?	<ul style="list-style-type: none"> - Communities: VCA/Victim assistance, links between community-level reporting channels and WAAI - SH response framework, including VCA to SH - Responsiveness to needs of populations on the move
1C. To what is IOM's PSEAH approach aligned IOM's policy on PSEAH?	<ul style="list-style-type: none"> - Degree of alignment between IOM policy on PSEAH (2016) and PSEAH approach - Evolution of PSEAH approach.
2. Coherence & Coordination	
Internal coherence / coordination	
2A. To what extent do IOM's internal policies, objectives and practices promote a coherent, comprehensive approach to PSEAH?	<ul style="list-style-type: none"> - Synergies and interlinkages with other interventions implemented by IOM - Degree of collaboration, complementarity between PSEAH-relevant departments within (HR, LEG, Protection/GBV, OIG) at global, regional and country levels. - Degree of complementarity of efforts between PSEAH efforts and cross-cutting sectors and policy areas (e.g.: HR, legal, protection, gender-based violence, etc.) - PSEAH mainstreaming within IOM interventions - PSEAH trickling down to IPs and third-party contractors
External coherence / coordination	
2B. To what extent has IOM's approach on PSEAH been consistent with UN international norms and standards to which IOM adheres?	<ul style="list-style-type: none"> - Alignment between IOM strategy with key international norms and standards on PSEAH.
2C. To what extent are IOM's efforts complementary to, and coordinated with, other actors' interventions on PSEAH?	<ul style="list-style-type: none"> - Degree of complementarity of efforts and coordination with other actors (inc. donors, UN agencies, INGOs, governments, etc). - Links with GBV actors at country level.
2D. To what extent are IOM's efforts adding value to the work of PSEAH international bodies, if at all? What comparative advantages (and distinct assets) does IOM have on PSEAH and to what extent are these comparative advantages being fully exploited?	<ul style="list-style-type: none"> - IOM leadership at IASC, strategic positioning in global PSEAH fora - Distinct features, comparative advantages, technical capacities and skills.
3. Efficiency	

3A. To what extent does IOM have adequate structures, human and financial resources for effective PSEAH actions (at country, regional, programmatic and global level)?	<ul style="list-style-type: none"> - Amount of funding, expertise and time invested in PSEAH. - Coordination mechanism (i.e.: PSEAH Task Force) generated coherence in the implementation of the strategic approach. - Degree to which the available resources for the PSEAH team have been efficiently used. - PSEAH integration into project budgets - PSEAH staffing/HR at RO and CO levels
4. Effectiveness	
4A. To what extent has IOM's approach to PSEAH been effective? What are IOM's greatest strengths, weaknesses, opportunities and threats to effective PSEAH?	<ul style="list-style-type: none"> - Technical capacity/support, tools and resources meet needs of offices/programmes. - Level of understanding of (P)SEAH among IOM staff - Reporting mechanisms are appropriate and safe for staff and communities - Trust in reporting systems/complaints handling process / protection from retaliation - Rights and needs of survivors are fulfilled - Offenders are held to account
4B. What measures can be put in place to mitigate SEAH risks from organizational and programmatic standpoints?	<ul style="list-style-type: none"> - Risk types and levels and corresponding risk management and mitigation measures (organizational/programmatic) - Benchmarking analysis
4C. How can IOM prioritize SEAH risks going forward?	
Note: Questions 4B and 4C to will be addressed in detail through the Risk Management/Mitigation Plan (Deliverable #2)	
5. Impact	
5A. What impact, if any, does IOM's approach to PSEAH have on shifting organizational culture, behaviour and attitudes to create an environment that protects from SEAH?	<ul style="list-style-type: none"> - Level of understanding of (P)SEAH among IOM staff - Code of Conduct - Knowledge of reporting obligations/mechanisms - Trust in reporting systems/complaints handling process, willingness to report
5B. How can IOM foster continuous learning and improvement, and strengthen accountability on PSEAH?	<ul style="list-style-type: none"> - Mechanisms for monitoring and evaluating PSEAH efforts and feedback loops (outputs, outcomes), information sharing between departments and also with survivors - Indicators to measure performance/achievements (e.g.: case management, knowledge of reporting mechanisms, trust in the reporting process, etc.).
6. Sustainability	
6A. To what extent is PSEAH institutionalized in IOM and considered in programming and operational activities?	<ul style="list-style-type: none"> - PSEAH mainstreaming into programming and operations (progress and limitations): HR, budgets, activities. - PSEAH trickling down to IPs and third-party contractors
6B. What steps could be taken to strengthen IOM's PSEAH structures and systems?	<ul style="list-style-type: none"> - Policies and procedures - PSEAH HR - PSEAH technical capacity
6C. To what extent was capacity developed, especially at the field level, to ensure the sustainability of efforts and benefits?	<ul style="list-style-type: none"> - Capacity building initiatives and tools - PSEAH technical support
6D. How has funding been secured to ensure implementation of the PSEA approach at all levels, and do these funding models remain relevant and appropriate going forward?	<ul style="list-style-type: none"> - Funding levels/sources/modalities for PSEAH at HQ, RO, CO levels - Funding allocation, prioritization decision-making - Funding gaps
7. Benchmarking	
7A. Assess IOM frameworks/systems in place against those of other organizations to identify strengths and weaknesses; focus on victim assistance and risk mitigation operational frameworks	How are other organizations: a) Addressing/mitigating and prioritizing SEA risks b) Addressing (mandatory) reporting obligations c) Ensuring a victim-centered approach in the way they handle SEAH allegations (including working with GBV actors)

ANNEX F – LIST OF DOCUMENTS CONSULTED

1. IOM PSEAH strategy
2. IOM 2021 Entity Level Action Plan
3. IN/234 (IOM PSEA Policy, 2016)
4. IN/15 (IOM Standards of Conduct)
5. IN/90 Rev 1 (Respectful Working Environment)
 - a. Final Draft
 - b. Guidelines On INgo
6. IN/275 (Misconduct)
7. IN/285 (AAP framework)
8. IN/282 (Retaliation) Final Draft
9. IN/161 (Relatives in the Workplace)
10. IN/275 (Reporting and Investigation of Misconduct Framework)
11. IOM Organigram
12. IOM's risk management framework - Draft version
13. (PENDING) Member State Language on PSEAH for Agreements
14. OECD DAC Recommendation on ending SEAH in the aid sector
15. IASC Six Core Principles PSEA
16. IASC PSEA Minimum Operating Standards
17. UN Comprehensive Strategy on Assistance and Support to Victims of SEA
18. UN Protocol on the Provision of Assistance to Victims of SEA
19. Technical Note in the Implementation of the UN Protocol on Victim Assistance
20. UN Protocol on SEA Allegations Involving Implementing Partners
21. Memo Guidance Note on Information Sharing
22. Policy on Integrating a Human Rights-based approach
23. A victim-centered approach to sexual harassment
24. Annual UN SEA survey results (2021)
25. Annual UN SH survey results (2020)
 - a. Consolidated UN SH report
 - b. IOM responses to the questions
26. IOM Programme and Budget for 2022 (Council 112th Session)
27. IOM Year in Review: 2020: link (started in 2020 and produced on a yearly basis)
28. IOM Year in Review: 2021: link
29. IOM End of Year Management Letter: 2019
30. IOM End of Year Management Letter: 2020
31. IOM End of Year Management Letter: 2021
32. IOM PSEA/PSEAH Task Force (Terms of Reference: 2019 and 2021 versions) link
33. IOM PSEA/PSEAH Task Force: Meeting Minutes and Notes for File (2018 to present) link
34. IOM PSEA Task Force Work Plan
35. MOPAN Report on IOM (2017 – 2018)
36. IOM developed PSEAH matrix in preparation for MOPAN assessment in 2022:
37. UN Fact Sheet – UN System Wide PSEA Initiative
38. IOM (linked to IN 90) Building a respectful work environment (2022.03.01)

39. IOM Presentation of key points (UNFPA GBV PSEA workshop to the HQ TF_11 October 2021):
link
40. IOM Video for micro-modules - Duty of Care (Do No Harm - PSEA)
41. IOM Video for micro-modules - Below the Surface (From a Victim's Perspective - PSEA)
42. Matrix on progress against MOPAN indicators (stock-taking prior to upcoming autumn 2022 MOPAN assessment on IOM).
43. MCC: shared with DDG (summary/future)
44. WAAI reporting page screenshot ENGLISH
45. Revised draft PSEA Policy: Anna (knowing there is still some sticking points)
46. Analysis of IOM projects which include elements of PSEA
47. PSEAH organigram now (2022): link (previously PSEA was covered by the Gender Coordination Unit, now called the Gender and Diversity Unit (GDU) and interagency (collective work) supported by the interagency PSEA team in IOM's department of operations and emergencies, the later which still exists)
48. IOM Interagency PSEA (history, 2002 - 2021)
49. IOM PSEA Tip Sheet and Timeline (developed in 2018 for period from 2002)
50. IOM PSEA Timeline (consolidated) (drafted in 2022) – content only
51. IOM Staff Advisories with content on PSEA/PSEAH sent out to IOM staff globally
52. IOM AirBNB SOPs and Annexes
53. IN/142 Policy on Reporting Irregular Practices Wrongdoing and Misconduct
54. IOM Call for Proposals (Terms of Reference contained within) to develop a communications campaign on the Prevention of Sexual Harassment within IOM
55. ICC Addressing Discrimination, Harassment, including Sexual Harassment, and Abuse of Authority

ANNEX G – KEY INFORMANTS LIST

	NAME	ORGANIZATION / OFFICE	POSITION
SENIOR ORGANIZATIONAL LEADERSHIP			
1	Antonio VITORINO	Office of Director General	Director General
2	Amy POPE	Executive Office	Deputy Director General for Management and Reform
3	Ugochi DANIELS	Executive Office	Deputy Director General for Operations
KEY PSEAH-RELEVANT DEPARTMENTS/UNITS/OFFICES IN HQ			
4	Dyane EPSTEIN	PSEAH Global Team	Senior Coordinator (PSEAH)
5	Anna REICHENBERG		Senior Governance and Protection Officer (PSEAH)
6	Sophia PIERRE-ANTOINE		PSEAH Officer
7	Etsuko INOUE*		Programme Officer <i>*support to the external evaluation</i>
8	Mutya MASKUN	Gender & Diversity Unit	Head
9	Helliana BERNER		Project Officer - "We Are All In"
10	Helder CASTRO	Risk Management Unit	Chief Risk Officer
11	Charlotte Geagea		Risk Officer
12	Anaïs NAU	Office of Inspector General (OIG)	Chief of Investigations
13	Riley BARRETT		Investigator
14	Mouna Laroussi	Department of HR Management	Chief, HRM
15	Conor TIERNEY		Chief, HRM (Policy)
16	Christine Adam	Department of Legal Affairs	Deputy Director (LEG)
17	Gabriela PEREIRA		Legal Officer
18	Cristiana MUTIU		Division Head
19	Evelyn KACHAJE		Legal Officer
20	Ariona AUBREY		Legal Contracts – Head of Division
21	Carolina Puentes	Legal Officer	
22	Rogelio BERNAL	Office of the Ombudsperson	Ombudsperson
23	Julie S. Black		Associate Ombuds Officer
24	Clarissa AZKOUL	Ethics and Conduct Office	Head
25	Elizabeth OPENSHAW	Staff Welfare Unit	Senior Staff Welfare Officer

26	David KNIGHT	Department of Strategic Planning and Organizational Performance	Director
27	Luc Yves VANDAMME		Director
28	Maricar (Icar) PURUGGANAN-ADKINS	Office of Staff Security	Security Policy and Training Coordination Officer
29	Florian FORSTER	Global Staff Advocacy Association	Chairperson

HEADS OF PROGRAMMATIC DEPARTMENTS / UNITS AND TECHNICAL SPECIALISTS

30	Monica GORACCI	Department of Programme Support and Migration Management	Director
31	Yitna GETACHEW	Department of Programme Support and Migration Management / Protection Division	Head
32	Jacqueline WEEKERS	Department of Programme Support and Migration Management / Migration Health Division	Director
33	Rex Arnold-ALAMBAN	Department of Operations & Emergencies	Director
34	Tristan BURNETT		Deputy Director
35	Rana JABER	Resettlement and Movement Management Division	Chief
36	David JOHN	US Refugee Assistance Programme	Global Programme Coordinator (USRAP)
37	Louise Mary O SHEA	Department of Operations & Emergencies /CCCM	GBV Specialist
38	Agnes Kwoba OLUSESE		GBV Officer
39	Christie BACAL-MAYENCOURT	Department of Operations & Emergencies (AAP)	AAP Officer
40	Mathilde VERSTRAETE	Department of Operations & Emergencies (MAAP)	Programme Officer (Mainstreaming Protection and Accountability to Affected Populations - MAAP)
41	Irina TODOROVA	Department of Programme Support and Migration Management	Head AVM Unit (Protection Division)
42	Nadia AKMOUN		Senior Protection Officer
43	Giulia TSHILUMBA		Protection Officer
44	Vivian ALT VIERA		Disabilities Inclusion Advisor

45	Andria KENNEY		Counter Trafficking In Humanitarian Settings Specialist
46	Daunia PAVONE	Department of Operations & Emergencies /Displacement Tracking Matrix	Senior Data Quality and Advocate Consultant
47	Alexandra HILEMAN	Inter-agency PSEA team	PSEA Project Manager
48	Mariska DE KEERSMAEKER		PSEA Support Officer
REGIONAL DIRECTORS			
49	Carmela GODEAU	Middle East and North Africa	Regional Director
50	Diego BELTRAND	Regional Response to Venezuela Situation	DG Special Envoy
RO PSEA FOCAL POINTS			
51	Oriane BATAILLE	West and Central Africa RO Dakar	Regional Protection & GBV specialist
52	Alexandra VALERIO	Asia and the Pacific RO Bangkok	Regional Protection & GBV specialist
53	Agueda MARIN	South America RO Buenos Aires	Senior Migrant Assistant Specialist (CT)
54	Amr TAHA	RO Vienna and Brussels Ukraine Response	Senior Regional Liaison & Policy Officer
55	Daniel REDONDO		Senior Migrant Assistant Specialist
CO PSEA FOCAL POINTS			
56	Hyejeong YOO	IOM Iraq	PSEA Office (Protection Coordinator)
57	Rawshan ZANNAT	IOM Bangladesh	Sr Project Assistant (GBV)
58	Muneyi MUCHANYUKA	IOM South Sudan	Protection Officer
59	Andromachi LAZARIDI	IOM Greece	Sr Gender & Protection Assistant Programme Dev & Imp
60	Monica NORIEGA	IOM Special Envoy's Office R4V	GBV Specialist
61	Amina EL HOUDERI	Previously IOM Libya; now IOM Kenya	PSEA Officer
CHIEFS OF MISSIONS			
62	Jean-Philippe CHAUZY	IOM Germany	Chief of Mission
63	Dana GRABER-LADEK	IOM Mexico	Chief of Mission
64	Tajma KURT	IOM Jordan	Chief of Mission
CRISIS COORDINATORS/PROGRAMME MANAGERS			
65	Marco CHIMENTON	IOM Ukraine	Crisis Coordinator

66	Hannah CURWEN	IOM Afghanistan	Crisis Coordinator
UN & MULTILATERAL ENTITIES and INGOs			
67	Gareth PRICE-JONES	IASC PSEAH Champion	IASC PSEAH Champion SHCR and
68	Anne-Marie CONNOR	SHCR and World Vision	World Vision
69	Johanna Eriksson	UNICEF	Senior Advisor Child Safeguarding
70	Eva BOLKART	UNFPA	Senior Coordinator PSEAH
71	Wendy CUE	OCHA	Senior Coordinator PSEAH
72	Natalia MACDONALD	WFP	Senior Advisor PSEA
73	Benjamin Rue	WFP	Head of Intake
	Kathrin BAUSH		Investigation Officer
	Annam SIDDIQI		Intake / Data analyst
74	Diana Jimena ARANGO	World Bank	Senior GBV and Development Specialist
THIRD PARTY SERVICE PROVIDERS/CONTRACTORS			
75	Louisa ELKINGTON	CTG	Client Services Director and General Counsel
76	Mustafa ALI	Stars Orbit Consultants	Project Officer
IMPLEMENTING PARTNERS			
77	Esther Namegabe	INTERSOS (International IP South Sudan)	Protection Project Manager & PSEAH Referent – Protection Focal Point
78	Florence Paul	Community Initiative for Development Organizations CIDO (National IP South Sudan)	Policy and Partnership Lead
79	Lucy Bree	Yazda (International IP Iraq)	Programme Coordinator
DONORS			
80	Diane BOULAY	US Permanent Mission	Humanitarian Affairs, Program Specialist
81	Courtney BLAKE		Senior humanitarian Lead (USAID)
82	Chelsea BOORMAN		Humanitarian Specialist
83	Elizabeth PENDER	USAID Bureau for Humanitarian Assistance (BHA)	Team Lead, Safe and Accountable Programming
84	Neil PATRICK	UK Foreign Commonwealth Development Office (FCDO)	Senior Policy Advisor
85	Anais LAFITE		Humanitarian Advisor
86	Natalia VERSTEEG		Humanitarian Advisor
87	Edo DRIESSEN		Senior Policy Officer

88	Mariska MEIJERHOF	Netherlands Permanent Mission GVA / Netherlands (capital level)	Senior Policy Officer – Migration
89	Andrew ROSE	Australia Permanent Mission (Geneva)	Director (Home Affairs)
90	Shaun CHOON		Executive Officer (Home Affairs)

ANNEX H – DATA COLLECTION TOOLS

A. PSEAH Team

BACKGROUND

1. Please briefly describe your PSEAH team: what are the team main objectives, activities and targets.

- Describe if, how and explain why those have evolved over the past few years.

RELEVANCE

2. Please walk us through IOM's approach to PSEAH from a historical perspective.

- How has IOM's approach to PSEAH evolved over time?
- Have priorities and needs of beneficiaries ever been accounted for? If so, can you describe how? If no, can you explain why?
- What are some of the approach's strengths and weaknesses?
- Please distinguish between SEA and SH, if any nuances.

3. In your opinion, to what extent is this approach fit-for-purpose taking into account IOM's strategic vision, global footprint, workforce, reach, scope and operating model? Why?

INTERNAL COHERENCE

4. Please describe where and why the PSEAH Team fits within IOM organigram?

- Has it evolved over time? If so, why?
- Does it fit for purpose? What are the advantages and disadvantages of the current positioning of the PSEAH team within IOM?

5. Please describe how the PSEAH team collaborate with other IOM PSEAH-relevant departments at global level:

- What are the strengths and weaknesses?
- What are the opportunities and threats?
- Have those relationships evolved over time? If so, why?
- Please distinguish between SEA and SH, if any nuances.

- a. Executive Office
- b. HR
- c. Security
- d. OIG
- e. LEG
- f. Gender
- g. Protection/GBV
- h. Other

6. Please describe how the PSEAH team promotes and supports the implementation of a coherent approach to PSEAH at global, regional and country levels.

- Does it fit for purpose?
- What are the strengths and weaknesses?
- What are the opportunities and threats?
- Please distinguish between SEA and SH, if any nuances.

7. Please describe how the PSEAH team promotes and supports PSEAH mainstreaming efforts within IOM operations.

- What are the strengths and weaknesses?
- What are the opportunities and threats?
- Please distinguish between SEA and SH, if any nuances.

8. Please describe how the PSEAH team promotes and supports a coherent and comprehensive approach to PSEAH with IPs and Third-Party contractors.

- What are the strengths and weaknesses?
- What are the opportunities and threats?

BENCHMARKING ON VICTIM ASSISTANCE

9. Please walk us through the process of SEA complaints handling as it happens in IOM from the moment an allegation is received, channeled to OiG, investigated and the case is closed.

- How are most SEA allegations channeled/received/collected? (e.g.: CFMs, dedicated staff in the field, etc.)
- Which departments/teams within CO, RO and HQ are engaged during the process and for what purpose?
- What is working well/not so well in this process?
- How does the CO/RO/HQ ensure that SEA victims are effectively linked to assistance?
- How are GBV core guiding principles (confidentiality, dignity, security, non-discrimination) implemented throughout the process of SEA complaints handling?
- Who (which function) is ultimately accountable for the SEA complaints handling from A to Z, including accountability to affected populations?

10. Please walk us through the process of SH complaints handling as it happens in IOM from the moment an allegation is received, channeled to OiG, investigated, and the case is closed.

- Which departments/teams at HQ are engaged during the process and for what purpose?
- Which departments/teams within CO, RO and HQ are engaged during the process and for what purpose?
- What is working well/not so well in this process?
- How does the CO/RO/HQ ensure that SH victims are effectively linked to assistance?
- How are GBV core guiding principles (confidentiality, dignity, security, non-discrimination) implemented throughout the process of SH complaints handling?

- Who (which function) is ultimately accountable for the SH complaints handling from A to Z?

EXTERNAL COHERENCE

11. To what extent has IOM's approach on PSEAH been consistent with UN international norms and standards to which IOM adheres?
12. To what extent do you think IOM's efforts are adding value to the work of PSEAH external bodies?

EFFICIENCY

13. Within your team, how are PSEAH functions resourced?
 - Are current resources sufficient?
 - If not, which additional HR/technical/financial resources are needed?
 - How efficient is the current funding model?
14. To what extent does IOM have adequate structures, human and financial resources for effective PSEAH actions at country, regional, programmatic and global level?
 - Are current human and financial resources sufficient?
 - If not, which additional HR/technical/financial resources are needed?
 - How efficient is the current funding model?

EFFECTIVENESS

15. Please describe your roles and responsibilities as members of the PSEAH Team.
 - Describe how the composition, roles and responsibilities have evolved for the past few years. Why have these changes occurred?
 - Does the current composition, roles and responsibilities are fit for purpose?
 - What are some of the strengths and weaknesses of your team composition and role?
16. Please walk us through frameworks/systems/tools/approached developed by the PSEAH team to prioritize and mitigate SEA risks at programmatic and operational levels.
 - Please elaborate on potential gaps, strengths and weaknesses.
 - Please explain how the current risks management framework fits IOM's global footprint, workforce, reach, scope and operating model, if at all.
 - Please distinguish between SEA and SH, if any nuances.
17. How can IOM strengthen its SEAH risks mitigation framework from organizational and programmatic standpoints?
 - Please elaborate on what could be a suitable approach/tool considering IOM's strategic vision, global workforce, reach, scope and operating model.

IMPACT

18. What kind of systems/indicators/data does PSEAH Team have/use to monitor and assess whether it is able to effectively deliver on its PSEAH responsibilities?

- If applicable: Are there any (additional) indicators/data that you think it would be helpful to have? Why?

19. What types of data/information does PSEAH Team share with others (who?) to foster continuous learning, improvement and accountability on PSEAH, if any?

20. In your opinion, to what extent have IOM's efforts on PSEAH been able to:

- Mitigate SEAH risks?
- Create an environment where safe reporting on sexual misconduct can take place? (e.g.: staff know how to report, staff feel safe to report, communities are provided with safe and accessible reporting channels, staff/victims are protected from retaliation, etc.)
- Uphold the rights of victims and address their needs?
- Implement and maintain high standards (do no harm, survivor-centered approach, GBV guiding principles, personal data protection)?
- Hold offenders to account?

SUSTAINABILITY

21. What steps are being taken, if any, to guarantee the sustainability of PSEAH efforts in IOM, considering financial, technical and HR needs, if at all?

- What more can be done to ensure PSEAH efforts are sustained across time?

ENDING THE DISCUSSION

22. Is there something else you would like share with us that we have not yet covered in our discussion?

B. Senior Organizational Leadership

BACKGROUND

1. Please tell us a bit about your involvement in IOM's PSEAH efforts.

RELEVANCE

2. Please walk us briefly through IOM's approach to PSEAH.

- In your opinion, to what extent is this approach fit-for-purpose taking into account IOM's strategic vision, global footprint, workforce, reach, scope and operating model?
- What are some of the approach's strengths and weaknesses?

3. How has IOM's approach to PSEAH evolved over time?

- What are some of the approach's strengths and weaknesses?

INTERNAL COHERENCE

4. How are the different IOM departments, involved in PSEAH, working together to deliver on IOM's PSEAH approach?

- What is working well and not so well? How can internal coherence/coordination be improved?

EXTERNAL COHERENCE

5. To what extent has IOM's approach on PSEAH been consistent with UN international norms and standards to which IOM adheres?

6. How has IOM's global strategic positioning on PSEAH evolved across time?

- To what extent are IOM's efforts adding value to the work of PSEAH international bodies, if at all?
- What comparative advantages (and distinct assets) does IOM have on PSEAH, if any? To what extent are these comparative advantages being fully exploited?

EFFECTIVENESS

7. As those who have ultimate accountability for PSEAH within IOM, to what extent do you think IOM achieving its objectives on PSEAH?

- What have been some key successes and shortfalls?
- How do you know IOM is/is not delivering well on PSEAH (complaints handling process, rights and needs of survivors are fulfilled, GBV core guiding principles maintained, offenders held accountable)?
- Please distinguish between SEA and SH, if any nuances.

IMPACT

8. In your opinion, to what extent have IOM's efforts on PSEAH been able to:

- Mitigate SEAH risks?

- Create an environment where safe reporting on sexual misconduct can take place? (e.g.: staff know how to report, staff feel safe to report, communities are provided with safe and accessible reporting channels, staff/victims are protected from retaliation, etc.)
- Uphold the rights of victims and address their needs?
- Implement and maintain high standards (do no harm, survivor-centered approach, GBV guiding principles, personal data protection)?
- Hold offenders to account?

9. How can IOM foster continuous learning and improvement and strengthen M&E efforts/tools on PSEAH?

SUSTAINABILITY

10. How is IOM guaranteeing the sustainability of PSEAH efforts considering financial, human and technical needs, if at all?

- What steps could be taken to ensure PSEAH efforts are sustained across time?

ENDING THE DISCUSSION

11. Is there something else you would like share with us that we have not yet covered in our discussion?

C. Office of Inspector General

BACKGROUND

1. Please tell us about OiG's involvement in PSEAH: what is OiG's role and your main responsibilities in relation to PSEAH?

INTERNAL COHERENCE / BENCHMARKING ON VICTIM ASSISTANCE

2. Please walk us through the process of SEA complaints handling, from the moment an allegation is received by OiG through investigation up to case closure.

- How are complaints prioritized for investigations?
- Which departments at HQ do you liaise with during the process and for what purpose?
- Which teams/staff in HQ, country/regional offices do you liaise with during this process and for what purpose?
- How do you ensure that SEA victims are effectively linked to assistance?
- How do you implement and maintain high standards (do no harm, survivor-centered approach, GBV guiding principles, personal data protection) throughout the process of SEA complaints handling?
- What information is shared with survivors?

3. Please walk us through the process of SH complaints handling, from the moment an allegation is received by OiG through investigation up to case closure.

- How are complaints prioritized for investigations?
- Which teams/staff in HQ, country/regional offices do you liaise with during the process and for what purpose?
- How do you ensure that SH victims are effectively linked to assistance?
- How do you implement and maintain high standards (do no harm, survivor-centered approach, GBV guiding principles, personal data protection) throughout the process of SH complaints handling?
- What information is shared with survivors?

EFFECTIVENESS

4. In your opinion, is the SEA complaints handling system in place, especially those aspects under OiG's responsibility, working effectively? Please elaborate on what are some of the system's strengths and weaknesses.

5. In your opinion, is the SH complaints handling system currently in place, especially those aspects under OiG's responsibility, working effectively? Please elaborate on what are some of the system's strengths and weaknesses.

IMPACT

6. What kind of systems/indicators/data does OiG have/use to monitor and assess whether it is able to effectively:

- Handle SEA/SH allegations
- Address to the needs of SEA/SH victims and uphold their rights?
- Implement and maintain high standards (do no harm, survivor-centered approach, GBV guiding principles, personal data protection)?
- If applicable: Are there any (additional) indicators/data that you think it would be helpful to have? Why?

7. What types of data/information does OiG share with others (who?) to foster continuous learning, improvement and accountability on PSEAH, if any?

8. In your opinion, to what extent have IOM's efforts on PSEAH been able to:

- Mitigate SEAH risks?
- Create an environment where safe reporting on sexual misconduct can take place? (e.g.: staff know how to report, staff feel safe to report, communities are provided with safe and accessible reporting channels, staff/victims are protected from retaliation, etc.)
- Uphold the rights of victims and address their needs?
- Implement and maintain high standards (do no harm, survivor-centered approach, GBV guiding principles, personal data protection)?
- Hold offenders to account?

EFFICIENCY

9. Please walk us through OiG's staffing structure and detail the specific human resources currently in place to support PSEAH.

- Please provide details on number of staff, gender composition of team(s), technical background/ expertise of staff on SEAH/SH related areas, mandatory training requirements and/or investments in continuous learning, etc.
- Are current resources sufficient? If not, what additional HR/technical capacities are needed?

SUSTAINABILITY

10. Considering the current HQ-centralized nature of IOM's investigation resources/capacities, what steps could be taken to strengthen IOM's PSEAH structures and systems and guarantee sustainability of PSEAH efforts?

ENDING THE DISCUSSION

11. Is there something else you would like share with that we have not yet covered in our discussion?

D. Department of Human Resources Management

BACKGROUND

1. Please tell us about DHRM's involvement in PSEAH: what is DHRM's role and your main responsibilities in relation to PSEAH?

INTERNAL COHERENCE

2. Please explain how DHRM engages and collaborates with the other departments involved in PSEAH (LEG, PSEAH team, OIG, Ethics, Staff Welfare, Office of the Ombudsperson, etc.).

- What is working well and not so well? How can internal coherence/coordination be improved between the various departments/teams?

3. Please explain how, if at all, the DHRM-HQ engages with other HR departments in ROs and COs on PSEAH.

- What is working well and not so well? How can coherence/coordination be improved between DHRs at the different levels on PSEAH?

EFFECTIVENESS

4. In your opinion, is IOM's approach to PSEAH, especially those aspects under DHRM's responsibility, working effectively? Please elaborate on what are some of the approach's strengths and weaknesses. Please distinguish between SEA and SH, if any nuances.

IMPACT

5. What kind of systems/indicators/data does DHRM have/use to monitor and assess whether it is able to effectively deliver on its PSEAH responsibilities?

- If applicable: Are there any (additional) indicators/data that you think it would be helpful to have? Why?

6. What types of data/information does DHRM share with others (who?) to foster continuous learning, improvement and accountability on PSEAH, if any?

- What information is shared with survivors when disciplinary action is taken against offenders? How is it shared?

7. In your opinion, to what extent have IOM's efforts on PSEAH been able to:

- Mitigate SEAH risks?
- Create an environment where safe reporting on sexual misconduct can take place? (e.g.: staff know how to report, staff feel safe to report, communities are provided with safe and accessible reporting channels, staff/victims are protected from retaliation, etc.)
- Uphold the rights of victims and address their needs?
- Implement and maintain high standards (do no harm, survivor-centered approach, GBV guiding principles, personal data protection)?
- Hold offenders to account?

EFFICIENCY

8. Within DHRM's staffing structure, are there any staff assigned specifically to support PSEAH efforts/mainstreaming?

- Do staff member(s) have specific technical background/ expertise on PSEAH-related areas?
- Are current resources sufficient? If not, which additional HR/technical capacities are needed?

9. Please walk us briefly through IOM's PSEAH human resources within IOM HQ, ROs and COs.

- How many IOM COs and ROs have dedicated PSEAH staff?
- Who decides whether dedicated PSEAH human resources are needed at RO and CO levels? To your knowledge, what issues are normally considered in making this determination?
- In your view, are current PSEAH resources at HQ, CO and RO sufficient to deliver on PSEAH objectives? If not, what additional human resources are needed and where?

SUSTAINABILITY

10. How, if at all, is DHRM mainstreaming PSEAH into its policies, systems and procedures? (e.g: vetting process/Clear Check, PSEAH questions inserted into interview questionnaires, etc.)

- What have been some key achievements to date?
- What gaps remain?
- What steps are being taken to cascade these policies, systems and procedures to the different institutional levels – RO, CO?
- How can these efforts be sustained? Please consider funding as well as human and technical resources requirements.

ENDING THE DISCUSSION

11. Is there something else you would like share with that we have not yet covered in our discussion?

E. Department of Legal Affairs

BACKGROUND

1. Please tell us about LEG's involvement in PSEAH: what is LEG's role and your main responsibilities in relation to PSEAH?

INTERNAL COHERENCE

2. Please explain how LEG engages and collaborates with other HQ departments involved in PSEAH (PSEAH team, OiG, DHR, Ethics, Office of the Ombudsperson, etc.).

- What is working well and not so well? How can internal coherence/coordination be improved between the various departments/teams?
- Please distinguish between SEA and SH, if any nuances.

3. Please explain how, if at all, the LEG-HQ engages with other administrative departments within ROs and COs on PSEAH.

- What is working well and not so well? How can coherence/coordination be improved between LEG and IOM administrative departments at different levels on PSEAH?
- Please distinguish between SEA and SH, if any nuances.

EFFECTIVENESS

4. In your opinion, is IOM's approach to PSEAH, especially those aspects under LEG's responsibility, working effectively? Please elaborate on what are some of the approach's strengths and weaknesses. Please distinguish between SEA and SH, if any nuances.

5. How do you ensure that appropriate/proportionate sanctions are implemented?

IMPACT

6. What kind of systems/indicators/data does LEG have/use to monitor and assess whether it is able to effectively deliver on its PSEAH responsibilities?

- If applicable: Are there any (additional) indicators/data that you think it would be helpful to have? Why?

7. What types of data/information does LEG share with others (who?) to foster continuous learning, improvement and accountability on PSEAH, if any?

- What information is shared with survivors when disciplinary action is taken against offenders? How is it shared?

8. In your opinion, to what extent have IOM's efforts on PSEAH been able to:

- Mitigate SEAH risks?
- Create an environment where safe reporting on sexual misconduct can take place? (e.g.: staff know how to report, staff feel safe to report, communities are provided with safe and accessible reporting channels, staff/victims are protected from retaliation, etc.)
- Uphold the rights of victims and address their needs?

- Implement and maintain high standards (do no harm, survivor-centered approach, GBV guiding principles, personal data protection)?
- Hold offenders to account?

EFFICIENCY

9. Within LEG's staffing structure, are there any staff assigned specifically to support PSEAH efforts/mainstreaming?
- Do staff member(s) have specific technical background/ expertise on PSEAH-related areas?
 - Are current resources sufficient? If not, which additional HR/technical capacities are needed?

SUSTAINABILITY

10. How, if at all, is LEG mainstreaming PSEAH into its practices and procedures?
- What have been some key achievements to date?
 - What gaps remain?
 - Please distinguish between SEA and SH, if any nuances.

ENDING THE DISCUSSION

11. Is there something else you would like share with that we have not yet covered in our discussion?

F. Gender and Diversity Unit

BACKGROUND

1. Please tell us a bit about GDU involvement in IOM's PSEAH efforts.

RELEVANCE

2. Please walk us briefly through IOM's approach to PSEAH from a historical perspective.
- How has IOM's approach to PSEAH evolved across time?
 - What are some of the approach's strengths and weaknesses?
 - In your opinion, to what extent is this approach fit-for-purpose taking into account IOM's strategic vision, global footprint, workforce, reach, scope and operating model?
 - Please distinguish between SEA and SH, if any nuances.

EXTERNAL COHERENCE

3. To what extent has IOM's approach on PSEAH been consistent with UN international norms and standards to which IOM adheres?

INTERNAL COHERENCE

4. To what extent and on which aspects does GDU collaborate and coordinate with the various IOM departments/teams involved in PSEAH?
- What is working well and not so well?
 - How can internal coherence/coordination be improved?

EFFECTIVENESS

5. Tell us about the WAAI platform, which is managed by GDU.
- When/how was the platform established?
 - Have priorities and needs of beneficiaries ever been accounted for? If so, can you describe how? If no, can you explain why?
 - What issues were considered for the platform's design phase?
 - What issues were considered for the design of the reporting template?
 - What are some of the WAAI platform's strengths and weaknesses?
 - Are there any aspects that should be strengthened?

IMPACT

6. In your opinion, to what extent have IOM's efforts on PSEAH been able to:
- Mitigate SEAH risks?
 - Create an environment where safe reporting on sexual misconduct can take place? (e.g.: staff know how to report, staff feel safe to report, communities are provided with safe and accessible reporting channels, staff/victims are protected from retaliation, etc.)
 - Uphold the rights of victims and address their needs?
 - Implement and maintain high standards (do no harm, survivor-centered approach, GBV guiding principles, personal data protection)?

- Hold offenders to account?

SUSTAINABILITY

7. How is IOM guaranteeing the sustainability of PSEAH efforts considering financial, human and technical needs, if at all?

- What steps could be taken to ensure PSEAH efforts are sustained across time?

ENDING THE DISCUSSION

8. Is there something else you would like share with us that we have not yet covered in our discussion?

G. Risk Management Unit

BACKGROUND

1. Please tell us about RMU's involvement in PSEAH: how has RMU engaging in PSEAH?

INTERNAL COHERENCE

2. Please explain how RMU engages and collaborates with other HQ departments involved in PSEAH (PSEAH team, OiG, DHR, Ethics, Office of the Ombudsperson, etc.), if at all.

- What is working well and not so well? How can internal coherence/coordination be improved between the various departments/teams?

EFFECTIVENESS

3. Please walk us through frameworks/systems/tools used by IOM to manage, prioritize and mitigate SEA risks at programmatic and operational levels.

- Please elaborate on potential gaps, strengths and weaknesses.
- Please explain how the current framework fits IOM's global footprint, workforce, reach, scope and operating model, if at all.
- Please distinguish between SEA and SH, if any nuances.

4. How can IOM strengthen its SEAH risks mitigation framework from organizational and programmatic standpoints?

- Please elaborate on what could be a suitable approach/tool considering IOM's strategic vision, global workforce, reach, scope and operating model.

IMPACT

5. In your opinion, to what extent have IOM's efforts on PSEAH been able to:

- Create an environment where safe reporting on sexual misconduct can take place? (e.g.: staff know how to report, staff feel safe to report, communities are provided with safe and accessible reporting channels, staff/victims are protected from retaliation, etc.)
- Uphold the rights of victims and address their needs?
- Implement and maintain high standards (do no harm, survivor-centered approach, GBV guiding principles, personal data protection)?
- Hold offenders to account?

SUSTAINABILITY

6. To what extent is RMU mainstreaming PSEAH into its broader systems, procedures and frameworks?

- What have been some key achievements to date?
- What gaps remain?
- Please distinguish between SEA and SH, if any nuances.

7. To what extent does RMU-HQ engages with counterparts within ROs and COs to cascade PSEA risk management/mitigation frameworks, tools, resources and technical capacities, etc.?

- What steps are being taken, if any, to institutionalize SEA and SH in IOM's risk management frameworks/approaches/systems and tools at the different levels – HQ, RO, CO?
- How can these efforts be sustained? Please consider funding as well as human and technical resources requirements.

ENDING THE DISCUSSION

8. Is there something else you would like share with that we have not yet covered in our discussion?

H. Office of the Ombudsperson

BACKGROUND

1. Please tell us about the OOM's involvement in PSH: what is OOM's role and your main responsibilities in relation to SH?

INTERNAL COHERENCE / BENCHMARKING ON VA

2. Please walk us through the process of SH complaints handling from the perspective of OMM.

- How are you notified about the complaint and the need for OOM involvement?
- Which teams/staff in HQ, country/regional offices do you liaise with during the mediation process and for what purpose?
- How do you ensure that SH victims are effectively linked to assistance, when they wish to access support services?
- How do you ensure that high standards (do no harm, survivor-centered approach, GBV guiding principles, personal data protection) are implemented throughout the process?

EFFECTIVENESS

3. In your opinion, is the SH complaints handling system in place, especially those aspects under OOM's responsibility, working effectively? Please elaborate on what are some of the system's strengths and weaknesses.

IMPACT

4. In your opinion, to what extent have IOM's efforts on PSH been able to:

- Protect staff from SH?
- Create an environment where safe reporting on sexual misconduct can take place? (e.g.: staff knows how to report, staff feel safe to report, staff/victims are protected from retaliation, etc.)
- Uphold the rights of victims and address their needs?
- Implement and maintain high standards (do no harm, survivor-centered approach, GBV guiding principles, personal data protection)?
- Hold offenders to account?

EFFICIENCY

5. Within OOM's staffing structure, are there any staff assigned specifically to handle SH cases?

- Do staff member(s) have specific technical background/ expertise on SH-related areas?
- Are current resources sufficient? If not, which additional HR/technical capacities are needed?

SUSTAINABILITY

6. Considering the current HQ-centralized nature of IOM's OOM capacities, which steps could be taken to strengthen IOM's internal structures and systems and guarantee sustainability of PSH efforts?

ENDING THE DISCUSSION

7. Is there something else you would like share with that we have not yet covered in our discussion?

I. Ethics and Conduct Office

BACKGROUND

1. Please tell us about the Ethics & Conduct involvement in PSH: what is EC's role and your main responsibilities in relation to SH?

INTERNAL COHERENCE / BENCHMARKING ON VA

2. Please walk us through the process of protection from retaliation complaints handling from the perspective of EC.

- How are you notified about the complaint and the need for EC involvement?
- Which teams/staff in HQ, country/regional offices do you liaise with during the process and for what purpose?
- How do you ensure that SH victims are effectively protected from retaliation while their complaint is being investigated?
- How do you ensure that high standards (do no harm, survivor-centered approach, GBV guiding principles, personal data protection) are implemented throughout the process?

EFFECTIVENESS

3. In your opinion, is the SH complaints handling system in place, and especially those aspects related to protection from retaliation which are under EC's responsibility, working effectively? Please elaborate on what are some of the system's strengths and weaknesses.

IMPACT

4. In your opinion, to what extent have IOM's efforts on PSH been able to:

- Protect staff from SH and retaliation?
- Create an environment where safe reporting on sexual misconduct can take place? (e.g.: staff know how to report, staff feel safe to report, staff/victims are protected from retaliation, etc.)
- Uphold the rights of SH victims and address their needs?
- Implement and maintain high standards (do no harm, survivor-centered approach, GBV guiding principles, personal data protection)?
- Hold offenders to account?

EFFICIENCY

5. Within EC's staffing structure, are there any staff assigned specifically to handle cases of retaliation?

- Do staff member(s) have specific technical background/ expertise on SH- and/or retaliation- related areas?
- Are current resources sufficient? If not, which additional HR/technical capacities are needed?

SUSTAINABILITY

6. Considering the current HQ-centralized nature of IOM's EC capacities, which steps could be taken to strengthen IOM's internal structures and systems and guarantee sustainability of PSH efforts?

ENDING THE DISCUSSION

7. Is there something else you would like share with that we have not yet covered in our discussion?

J. Staff Welfare Unit

BACKGROUND

1. Please tell us about the SW's involvement in PSH: what is SW's role and your main responsibilities in relation to SH?

INTERNAL COHERENCE / BENCHMARKING ON VA

2. How are you notified about the need for SW involvement in cases related to SH?

- Which teams/staff in HQ, country/regional offices do you liaise with during the process and for what purpose?
- How do you ensure SH victims are effectively linked to assistance, when they wish to access support services?
- How do you ensure that high standards (do no harm, survivor-centered approach, GBV guiding principles, personal data protection) are implemented throughout the process?

EFFECTIVENESS

3. In your opinion, is the SH complaints handling system in place, and especially those aspects related to victim assistance, working effectively? Please elaborate on what are some of the system's strengths and weaknesses.

IMPACT

4. In your opinion, to what extent have IOM's efforts on PSH been able to:

- Protect staff from SH and retaliation?
- Create an environment where safe reporting on sexual misconduct can take place? (e.g.: staff know how to report, staff feel safe to report, staff/victims are protected from retaliation, etc.)
- Uphold the rights of SH victims and address their needs?
- Implement and maintain high standards (do no harm, survivor-centered approach, GBV guiding principles, personal data protection)?
- Hold offenders to account?

EFFICIENCY

5. Within SW, are there any staff with technical background/ expertise on SH?

- Are current resources sufficient to support PSH? If not, which additional HR/technical capacities are needed?

SUSTAINABILITY

6. Considering the current HQ-centralized nature of IOM's SW capacities, which steps could be taken to strengthen IOM's internal structures and systems and guarantee sustainability of PSH efforts?

ENDING THE DISCUSSION

7. Is there something else you would like share with that we have not yet covered in our discussion?

K. Department of Strategic Planning

BACKGROUND

1. Please tell us a bit about DRD's involvement in IOM's PSEAH efforts.

INTERNAL COHERENCE

2. To what extent and on which aspects does DRD collaborate and coordinate with the various IOM departments/teams involved in PSEAH?

- What is working well and not so well?
- How can internal coherence/coordination be improved?
- Please distinguish between SEA and SH, if any nuances.

IMPACT

3. In your opinion, to what extent have IOM's efforts on PSEAH been able to:

- Mitigate SEAH risks?
- Create an environment where safe reporting on sexual misconduct can take place? (e.g.: staff know how to report, staff feel safe to report, communities are provided with safe and accessible reporting channels, staff/victims are protected from retaliation, etc.)
- Uphold the rights of victims and address their needs?
- Implement and maintain high standards (do no harm, survivor-centered approach, GBV guiding principles, personal data protection)?
- Hold offenders to account?

SUSTAINABILITY

4. How is IOM currently funding its PSEAH efforts at HQ, RO and CO levels?

5. What steps are being taken, if any, to guarantee the sustainability of PSEAH efforts considering financial needs, if at all?

- What more can be done to ensure PSEAH efforts are sustained across time?

ENDING THE DISCUSSION

6. Is there something else you would like share with us that we have not yet covered in our discussion?

L. Office of Staff Security

BACKGROUND

1. Please tell us a bit about OST's involvement in IOM's PSEAH efforts.

INTERNAL COHERENCE

2. To what extent and on which aspects does OST collaborate and coordinate with the various IOM departments/teams involved in PSEAH at HQ level?

- What is working well and not so well?
- How can internal coherence/coordination be improved?
- Please distinguish between SEA and SH, if any nuances.

3. To what extent and on which aspects does OST collaborate and coordinate with the various IOM departments/teams involved in PSEAH at country/regional offices?

- How do you ensure that PSEAH victims are effectively protected from retaliation while their complaint is being investigated?

IMPACT

4. In your opinion, to what extent have IOM's efforts on PSEAH been able to:

- Mitigate SEAH risks?
- Create an environment where safe reporting on sexual misconduct can take place? (e.g.: staff know how to report, staff feel safe to report, communities are provided with safe and accessible reporting channels, staff/victims are protected from retaliation, etc.)
- Uphold the rights of victims and address their needs?
- Implement and maintain high standards (do no harm, survivor-centered approach, GBV guiding principles, personal data protection)?
- Hold offenders to account?

ENDING THE DISCUSSION

5. Is there something else you would like share with us that we have not yet covered in our discussion?

M. Heads of programmatic departments/units/offices and/or Technical specialists

BACKGROUND

1. Please tell us a bit about your/your team's involvement in IOM's PSEAH efforts.

INTERNAL COHERENCE

2. To what extent and on which aspects do you/your team collaborate and coordinate with the various IOM departments/teams involved in PSEAH at HQ?

- What is working well and not so well?
- How can internal coherence/coordination be improved?
- Please distinguish between SEA and SH, if any nuances.

EFFECTIVENESS

3. To what extent do you/your team receive the appropriate capacity/support, including technical guidance, on how you/your team/programme/department are supposed to engage/support PSEAH efforts, if at all?

- Is this guidance/support sufficient?
- What are the gaps?
- Please distinguish between SEA and SH, if any nuances.

4. For GBV/Protection teams/staff only

- To what extent and on which aspects do you/your team collaborate and coordinate with the various IOM departments/teams involved in PSEAH at RO and CO levels?
- Are there any aspects of your work on disability, counter-trafficking and CP where such collaboration occurs? Please describe.
- What happens when there are no Protection/GBV staffs in operations?

5. For AAP teams/staff only

- How is IOM linking country/mission-level CFMs with the WAAI platform? What kind of guidance exists on that to support operations in effectively establishing these links, if any?
- To what extent are you/is AAP staff at CO/RO level involved in the feedback process of allegations, if at all?

IMPACT

6. In your opinion, to what extent have IOM's efforts on PSEAH been able to:

- Mitigate SEAH risks?
- Create an environment where safe reporting on sexual misconduct can take place? (e.g.: staff know how to report, staff feel safe to report, communities are provided with safe and accessible reporting channels, staff/victims are protected from retaliation, etc.)
- Uphold the rights of victims and address their needs?
- Implement and maintain high standards (do no harm, survivor-centered approach, GBV guiding principles, personal data protection)?

- Hold offenders to account?

SUSTAINABILITY

7. How, if at all, is your team/department mainstreaming PSEAH into its programmes, frameworks, procedures, etc.?

- What have been some key achievements to date?
- What gaps remain?
- What steps are being taken to cascade these to the different operational levels – RO, CO?
- How can these efforts be sustained? Please consider funding as well as human and technical resources requirements.

ENDING THE DISCUSSION

8. Is there something else you would like share with us that we have not yet covered in our discussion?

N. Regional Directors

BACKGROUND

1. Please tell us a bit about your/your RO involvement in IOM's PSEAH efforts.

RELEVANCE

2. In your opinion, to what extent is IOM's approach to PSEA fit for purpose?

INTERNAL COHERENCE

3. To what extent and on which aspects does your RO collaborate and coordinate with the various IOM departments/teams involved in PSEAH at HQ, other ROs, and COs under your region of coverage?

- What is working well and not so well?
- How can internal coherence/coordination be improved?
- Please distinguish between SEA and SH, if any nuances.

EFFICIENCY

4. Within your RO, how are PSEAH functions resourced?

- Are current resources sufficient?
- If not, which additional HR/technical/financial resources are needed?
- How efficient is the current funding model?

EFFECTIVENESS

5. What kind of capacity/support, including technical guidance, do you you/your RO receive to ensure effective PSEAH, if at all? (NOTE: Covers both supports received from HQ PSEAH team, as well as RO Protection FP/Specialist if there is one in place).

- Is this guidance/support sufficient?
- What are the gaps?
- Please distinguish between SEA and SH, if any nuances.

IMPACT

6. In your opinion, to what extent have IOM's efforts on PSEAH been able to:

- Mitigate SEAH risks?
- Create an environment where safe reporting on sexual misconduct can take place? (e.g.: staff know how to report, staff feel safe to report, communities are provided with safe and accessible reporting channels, staff/victims are protected from retaliation, etc.)
- Uphold the rights of victims and address their needs?
- Implement and maintain high standards (do no harm, survivor-centered approach, GBV guiding principles, personal data protection)?
- Hold offenders to account?

SUSTAINABILITY

7. How, if at all, is the RO mainstreaming PSEAH into its programmes, frameworks, procedures, etc.?

- What have been some key achievements to date?
- What gaps remain?
- How can these efforts be sustained? Please consider funding as well as human and technical resources requirements.

8. What steps are being taken in the RO, if any, to guarantee the sustainability of PSEAH efforts considering financial, technical and HR needs, if at all?

- What more can be done to ensure PSEAH efforts are sustained across time?

ENDING THE DISCUSSION

9. Is there something else you would like share with us that we have not yet covered in our discussion?

O. Chiefs of Missions

BACKGROUND

1. Please tell us a bit about your/your CO involvement in IOM's PSEAH efforts.

RELEVANCE

2. In your opinion, to what extent is IOM's approach to PSEA fit for purpose?

EXTERNAL COHERENCE

3. To what extent and on which aspects do you/your CO collaborate and coordinate with the various other actors/coordination structures involved in PSEAH in your context?

INTERNAL COHERENCE

4. To what extent and on which aspects does you/your CO collaborate and coordinate with the various IOM departments/teams involved in PSEAH at HQ, other ROs, and COs?

- What is working well and not so well?
- How can internal coherence/coordination be improved?
- Please distinguish between SEA and SH, if any nuances.

EFFICIENCY

5. Within your CO, how are PSEAH functions resourced?

- Are current resources sufficient?
- If not, which additional HR/technical/financial resources are needed?
- How efficient is the current funding model?

EFFECTIVENESS

6. What kind of capacity/support, including technical guidance, do you you/your CO receive from to ensure effective PSEAH, if at all? (NOTE: Covers both supports received from HQ PSEAH team, as well as RO and CO PSEA/Protection FP/Specialist if there is one in place).

- Is this guidance/support sufficient?
- What are the gaps?

IMPACT

7. In your opinion, to what extent have IOM's efforts on PSEAH been able to:

- Mitigate SEAH risks?
- Create an environment where safe reporting on sexual misconduct can take place? (e.g.: staff know how to report, staff feel safe to report, communities are provided with safe and accessible reporting channels, staff/victims are protected from retaliation, etc.)
- Uphold the rights of victims and address their needs?
- Implement and maintain high standards (do no harm, survivor-centered approach, GBV guiding principles, personal data protection)?
- Hold offenders to account?

SUSTAINABILITY

8. How, if at all, is the mission mainstreaming PSEAH into its programmes, frameworks, procedures, etc.?

- What have been some key achievements to date?
- What gaps remain?
- How can these efforts be sustained? Please consider funding as well as human and technical resources requirements.

9. What steps are being taken in the mission, if any, to guarantee the sustainability of PSEAH efforts considering financial, technical and HR needs, if at all?

- What more can be done to ensure PSEAH efforts are sustained across time?

ENDING THE DISCUSSION

10. Is there something else you would like share with us that we have not yet covered in our discussion?

P. PSEA Focal Points/Experts (RO/CO)

BACKGROUND

1. Please tell us a bit about your involvement in IOM's PSEAH efforts. What is your role and main responsibilities in relation to PSEAH as RO/CO Focal Point?

RELEVANCE

2. Please walk us briefly through IOM's approach to PSEAH from a historical perspective.

- How has IOM's approach to PSEAH evolved across time?
- What are some of the approach's strengths and weaknesses?
- Please distinguish between SEA and SH, if any nuances.

3. In your opinion, to what extent is this approach fit-for-purpose taking into account IOM's strategic vision, global footprint, workforce, reach, scope and operating model? Why?

INTERNAL COHERENCE / BENCHMARKING ON VA

4. Please walk us through the process of SEA complaints handling as it happens in your office/context, from the moment an allegation is received, channeled to OiG, investigated and the case is closed.

- How are most SEA allegations channeled/received/picked up? (e.g.: CFMs, staff in the field, etc.)
- Which departments/teams within your office, RO and HQ are engaged during the process and for what purpose?
- What is working well/not so well in this process?
- How does the CO/RO ensure that SEA victims are effectively linked to assistance?
- How are GBV core guiding principles (confidentiality, dignity, security, non-discrimination) implemented throughout the process of SEA complaints handling?
- Who (which function) is ultimately accountable for the SEA complaints handling from A to Z, including accountability to affected populations?

5. Please walk us through the process of SH complaints handling as it happens in your CO/RO, from the moment an allegation is received, channeled to OiG, investigated, and the case is closed.

- Which departments/teams at HQ are engaged during the process and for what purpose?
- Which departments/teams within your office, RO and HQ are engaged during the process and for what purpose?
- What is working well/not so well in this process?
- How does the CO/RO ensure that SH victims are effectively linked to assistance?
- How are GBV core guiding principles (confidentiality, dignity, security, non-discrimination) implemented throughout the process of SH complaints handling?
- Who (which function) is ultimately accountable for the SH complaints handling from A to Z, including accountability to affected populations?

EXTERNAL COHERENCE

6. To what extent has IOM's approach on PSEAH been consistent with UN international norms and standards to which IOM adheres?

7. Which actors/coordination mechanisms are you working with within your context/response on PSEAH? Please provide more details and highlight key successes and shortfalls on issues relating to external coherence/coordination.

EFFICIENCY

8. Within your RO/CO, how are PSEAH functions resourced?

- Are current resources sufficient?
- If not, which additional HR/technical/financial resources are needed?
- How efficient is the current funding model?

EFFECTIVENESS

9. Please walk us through frameworks/systems/tools/approaches used by IOM to manage in your office/context to prioritize and mitigate SEAH risks at programmatic and operational levels.

- Please elaborate on potential gaps, strengths and weaknesses.
- Please distinguish between SEA and SH, if any nuances.

10. How can IOM strengthen its SEAH risks mitigation framework from organizational and programmatic standpoints?

- Please elaborate on what could be a suitable approach/tool considering IOM's strategic vision, global workforce, reach, scope and operating model.

11. What kind of capacity/support, including technical guidance, do you receive to ensure you are able to effectively support PSEAH within your CO/RO, if at all? (NOTE: Covers both supports received from HQ PSEAH team and RO PSEA/Protection FP/Specialist if there is one in place).

- Is this guidance/support sufficient?
- What are the gaps?
- Please distinguish between SEA and SH, if any nuances.

IMPACT

12. In your opinion, to what extent have IOM's efforts on PSEAH been able to:

- Mitigate SEAH risks?
- Create an environment where safe reporting on sexual misconduct can take place? (e.g.: staff know how to report, staff feel safe to report, communities are provided with safe and accessible reporting channels, staff/victims are protected from retaliation, etc.)
- Uphold the rights of victims and address their needs?
- Implement and maintain high standards (do no harm, survivor-centered approach, GBV guiding principles, personal data protection)?
- Hold offenders to account?

SUSTAINABILITY

13. How, if at all, is the CO/RO mainstreaming PSEAH into its programmes, frameworks, procedures, etc.?

- What have been some key achievements to date?
- What gaps remain?
- How can these efforts be sustained? Please consider funding as well as human and technical resources requirements.

14. What steps are being taken, if any, to guarantee the sustainability of PSEAH efforts in your CO/RO, considering financial, technical and HR needs, if at all?

- What more can be done to ensure PSEAH efforts are sustained over time?

ENDING THE DISCUSSION

15. Is there something else you would like share with us that we have not yet covered in our discussion?

Q. Crisis Coordinators / Programme Managers

BACKGROUND

1. Please tell us a bit about involvement in IOM's PSEAH efforts.

RELEVANCE

2. In your opinion, to what extent is IOM's approach to PSEA fit for purpose?

INTERNAL COHERENCE

3. To what extent and on which aspects do you collaborate and coordinate with the PSEAH team in HQ or PSEA FP/specialists in your programme/response?

- What is working well and not so well?
- How can internal coherence/coordination be improved?
- Please distinguish between SEA and SH, if any nuances.

EFFICIENCY

4. Within your programme/response, how are you resourcing PSEAH functions?

- How efficient is this model?
- Are current resources sufficient?
- If not, which additional HR/technical/financial resources are needed?

EFFECTIVENESS

5. What kind of capacity/support, including technical guidance, do you/your programme/response receive to ensure effective PSEAH, if at all? (NOTE: Covers both supports received from HQ PSEAH team and RO PSEA/Protection FP/Specialist if there is one in place).

- Is this guidance/support sufficient?
- What are the gaps?

IMPACT

6. In your opinion, to what extent have IOM's efforts on PSEAH been able to:

- Mitigate SEAH risks?
- Create an environment where safe reporting on sexual misconduct can take place? (e.g.: staff know how to report, staff feel safe to report, communities are provided with safe and accessible reporting channels, staff/victims are protected from retaliation, etc.)
- Uphold the rights of victims and address their needs?
- Implement and maintain high standards (do no harm, survivor-centered approach, GBV guiding principles, personal data protection)?
- Hold offenders to account?

SUSTAINABILITY

7. How, if at all, are you mainstreaming PSEAH into your programming/response?

- What gaps remain?

- How can these efforts be sustained? Please consider funding as well as human and technical resources requirements.

8. What steps are being taken, if any, to guarantee the sustainability of PSEAH efforts considering financial needs, if at all?

- What more can be done to ensure PSEAH efforts are sustained across time?

ENDING THE DISCUSSION

9. Is there something else you would like share with us that we have not yet covered in our discussion?

R. Third-Party Contractors

BACKGROUND

1. Please tell us a bit about your involvement with IOM.

EXTERNAL COHERENCE

2. Under IOM contracts, what are your PSEAH obligations as a third-party contractor?
 - Please distinguish between SEA and SH, if any nuances.
 - How are IOM's standard contractual clauses on SEAH different from those of other UN agencies, if at all?
3. How are you implementing these obligations?
4. What kind of support, if any, do you receive from IOM to implement these obligations?
 - What is working well and not so well?
 - What are the gaps?

EFFICIENCY

5. Within your IOM-funded programmes/projects, how are you resourcing PSEAH functions, if at all?
 - Are current resources sufficient? If not, which additional HR/technical/financial resources are needed?

ENDING THE DISCUSSION

6. Is there something else you would like share with us that we have not yet covered in our discussion?

S. Implementing Partners

BACKGROUND

1. Please tell us a bit about your involvement with IOM.

EXTERNAL COHERENCE

2. Has your organization been assessed for PSEAH capacities?

- Please describe the process and challenges, if any.

3. Under IOM contracts, what are your PSEAH obligations as an implementing partner?

- Please distinguish between SEA and SH, if any nuances.
- How are IOM's standard contractual clauses on SEA different from those of other UN agencies, if at all?

4. How are you implementing these obligations? (including: mandatory reporting, victim assistance, etc.)

5. What kind of support, if any, do you receive from IOM to implement these commitments?

- What is working well and not so well?
- What are the gaps?

EFFICIENCY

6. Within your IOM-funded programmes/projects, how are you resourcing PSEAH functions, if at all?

- Are current resources sufficient? If not, which additional HR/technical/financial resources are needed?

BENCHMARKING *(if applicable)*

7. What systems are in place within your organization to receive and handle SEA allegations? Please walk us through the SEA complaints handling process – from reporting to case closure.

- How does your organization ensure that the process remains victim-centered and that survivors are effectively linked to services?

8. Does your organization have any framework/system in place to assess SEA risks at programmatic and operational levels, and then determine the necessary risk management and mitigation measures to be put in place to address these risks? Please provide us with a brief overview of how this framework/system works.

- What criteria do you use to determine/categorize/prioritize risks?
- What are the framework/system's major strengths and weaknesses?

ENDING THE DISCUSSION

9. Is there something else you would like share with us that we have not yet covered in our discussion?

T. Donors

BACKGROUND

1. Please tell us a bit about your involvement with IOM.

RELEVANCE

2. Why funding IOM's PSEAH institutional strengthening efforts a priority for you as a donor?

COHERENCE

3. What comparative advantages (and distinct assets) does IOM have on PSEAH and to what extent are these comparative advantages being fully exploited?

EFFECTIVENESS

4. In your opinion's what are IOM's greatest strengths, weaknesses, opportunities and threats to effective PSEAH?

IMPACT

5. In your opinion, to what extent have IOM's efforts on PSEAH been able to:

- Mitigate SEAH risks?
- Create an environment where safe reporting on sexual misconduct can take place? (e.g.: staff know how to report, staff feel safe to report, communities are provided with safe and accessible reporting channels, staff/victims are protected from retaliation, etc.)
- Uphold the rights of victims and address their needs?
- Implement and maintain high standards (do no harm, survivor-centered approach, GBV guiding principles, personal data protection)?
- Hold offenders to account?

SUSTAINABILITY

6. In funding proposals submitted by IOM, to what extent, if at all, is it considering PSEAH institutional sustainability to ensure PSEAH efforts are sustained over time?

ENDING THE DISCUSSION

7. Is there something else you would like share with us that we have not yet covered in our discussion?

U. UN System and Multilateral entities and INGOs

A. BACKGROUND

1. Please tell us a bit about your role in PSEAH efforts within your organization.

BENCHMARKING

2. How is reporting addressed:

- In your organization's PSEA Policy?
- In your organization's SH Policy?

3. What systems are in place within your organization to receive and handle SEA/SH allegations? Please walk us through the SEA/SH complaints handling process – from reporting to case closure.

- How does your organization ensure that the process remains victim-centered and that survivors are effectively linked to services?

4. Does your organization have any framework/system in place to assess SEA/SH risks at programmatic and operational levels, and then determine the necessary risk management and mitigation measures to be put in place to address these risks? Please provide us with a brief overview of how this framework/system works.

- What criteria do you use to determine/categorize/prioritize risks?
- What are the framework/system's major strengths and weaknesses?

EXTERNAL COHERENCE

5. *If Informant is an IASC/APP-PSEAH agency representative* - To what extent are IOM's efforts adding value to the work of PSEA international bodies/coordination mechanisms? What comparative advantages (and distinct assets) does IOM have regarding PSEA, if any?

- To what extent are IOM's efforts complementary to, and coordinated with, other actors' interventions on PSEAH at the global level?

ENDING THE DISCUSSION

6. Is there something else you would like share with us about organization's PSEAH systems and practices (or IOM's global positioning in PSEAH) that we have not yet covered in our discussion?

ⁱ Note that specific guidance on PSEAH funding is outlined in the PSEAH Toolkit and Checklist.