

Management Response and Action Plan Matrix

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

Name and function of the management response coordinator: Dyane Epstein, Senior Coordinator, Protection from Sexual Exploitation and Abuse and Sexual Harassment, PSEAH Unit

Date of publication: 5 August 2023

Overall comment on evaluation process:

IOM welcomes the findings and recommendations outlined in the IOM External Evaluation on Protection from Sexual Exploitation and Abuse and Sexual Harassment (PSEAH). A wide range of internal and external stakeholders were consulted to identify the accomplishments and ensure solid recommendations.

Of the 62 recommendations emanating from the External Evaluation report, IOM *Accepts*, *Partially Accepts* and does *Not Accept* as follows:

Table 1: Acceptance of External Evaluation Recommendations

Level of acceptance	TOTAL
Accept	46 recommendations
Partially Accept	14 recommendations ¹
Not Accept	2 recommendations
TOTAL	62 recommendations

The External Evaluation recommendations cut across the following seven categories: 1) Relevance; 2) Internal coherence, 3) External coherence; 4) Effectiveness 5) Efficiency; 6) Impact; and 7) Sustainability.

Table 2: External Evaluation (Thematic Areas)

		Recommendations #	TOTAL
1	Relevance	1.1 – 1.7	7 recommendations
2	Internal Coherence	2.1 – 2.4	4 recommendations
3	External Coherence	3.1 – 3.6	6 recommendations
4	Effectiveness	4.1 – 4.16	16 recommendations
5	Efficiency	5.1 – 5.15	15 recommendations
6	Impact	6.1 – 6.5	5 recommendations
7	Sustainability	7.1 – 7.9	9 recommendations
	TOTAL		62 recommendations

¹ Recommendation #29 has two elements – one was accepted and one was not accepted; Recommendation #60 has four elements - two were not accepted and two were partially accepted.

For the purposes of the External Evaluation Management Response and Action Plan Matrix, the recommendations were re-organized, in line with the IOM PSEAH Strategy, five (5) pillars: 1) Leadership and Organizational Culture; 2) Institutional Accountability and Transparency; 3) Communication, Capacity-Building and Behaviour Change; Pillar 4) Quality and Accessible Victim Assistance; and 5) Partnership and Coordination.

Table 3: IOM PSEAH Strategic Pillars

		Rec #	TOTAL
1	Leadership and Culture	1 - 18	18 recommendations
2	Institutional Accountability and Transparency	19 - 33	15 recommendations
3	Communication, Capacity Development and Behaviour Change	34 - 43	10 recommendations
4	Quality Victim Assistance	44 - 52	9 recommendations
5	Partnership and Coordination	53 - 62	10 recommendations
		TOTAL	62 recommendations

Pillar 1: Leadership and Organizational Culture	
Recommendation #1	
Internal Coherence: Recommendation 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)	
Responsible unit(s): PSEAH Support from: EO and various entities, as required	
Management response – Accept	
Key actions: Develop informational materials and present on IOM’s PSEAH approach, strategic pillars and operational sectors; organize briefing sessions, bilateral meetings, and deliver other communications, as required.	
Implementation monitoring status – discarded/open/completed: (Time 2)	
Comments on implementation status: (Time 2)	
Final implementation monitoring status – discarded/open/completed: (Time 3)	
Final comments on implementation status: (Time 3)	
Recommendation #2	
Internal Coherence: Recommendation 2.2	
As the main coordination body on PSEAH issues, the IOM PSEAH Task Force should be more results-oriented; it can be leveraged as a collective forum for producing joint deliverables and enhance PSEAH 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; c) be co-chaired by DDGs Pope and Daniels, alternating.	
Responsible unit(s): PSEAH Support from: DDG-MR, DDG-O	
Management response – Accept	
Key actions: Revise ToR for the IOM PSEAH Task Force and share with relevant internal stakeholders/entities; Identify key priorities within the Task Force, based on external evaluation results and develop a system for tracking (e.g. FAQs as first key deliverable).	
Implementation monitoring status – discarded/open/completed: (Time 2)	
Comments on implementation status: (Time 2)	

<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p> <p>Final comments on implementation status: <i>(Time 3)</i></p>
<p>Recommendation #3 Efficiency: Recommendation 5.1</p>
<p>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.</p>
<p>Responsible unit(s): PSEAH Support from: EO, DHR, IGF, DDG-MR</p>
<p>Management response – Accept</p> <p>Key actions: With secured funding, strengthen the PSEAH global team through both project funds (e.g. MIRAC, IGF, and donor funds); Prepare proposals for dedicated PSEAH staffing support; Develop ToRs for select regional and/or field locations; Advocate with donors; Recruit; Onboard new staff.</p>
<p>Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i></p> <p>Comments on implementation status: <i>(Time 2)</i></p>
<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p> <p>Final comments on implementation status: <i>(Time 3)</i></p>
<p>Recommendation #4 <i>(linked to recommendation #47)</i> Efficiency: Recommendation 5.2</p>
<p>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).</p>
<p>Responsible unit(s): PSEAH Support from: EO, DHR, IGF, DDG-MR</p>

<p>Management response – Accept</p> <p>Key actions: Finalize ToR for Victim Care Officer (VCO) (P5); Advertise the position, shortlist, interview, select; Recruit the VCO and onboard; Workplan developed with key deliverables.</p>
<p>Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i></p> <p>Comments on implementation status: <i>(Time 2)</i></p>
<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p> <p>Final comments on implementation status: <i>(Time 3)</i></p>
<p>Recommendation #5 Efficiency: Recommendation 5.3</p>
<p>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. IOM should also identify existing rosters of PSEA experts that they could tap into.</p>
<p>Responsible unit(s): PSEAH Support from: DHR, DOE (roster), DOE (GBV), DOE (inter-agency PSEA)</p>
<p>Management response – Accept</p> <p>Key actions: Identify linkages and create synergies between PSEAH and DOE/HR and other IOM entities involved in L3 deployments to avoid duplication; Depending on findings, develop, strengthen or integrate PSEAH within existing systems; Identify the PSEAH needs (technical expertise, availability, languages); identify methodology for identifying qualified staff to undertake TDYs; Populate system with names of qualified staff; identify and leverage linkages with other PSEA rosters and PSEA Networks outside of IOM, including at the inter-agency level, to support population of the roster with qualified staff; strengthen capacity-building of roster members on engagement with PSEA inter-agency structures.</p>
<p>Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i></p> <p>Comments on implementation status: <i>(Time 2)</i></p>
<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p> <p>Final comments on implementation status: <i>(Time 3)</i></p>
<p>Recommendation #6 Efficiency: Recommendation 5.4</p>

Physical decentralization to increase field office presence² 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)³.

Responsible unit(s): OIG

Management response – Accept

Key actions: Analyze OIG statistics to identify suitable OIG field office locations; Prepare strategic vision, proposal and justification for budget process, accordingly; Obtain buy-in from senior management and Member States approval; Recruit and roster suitable, qualified and experienced candidates with an SEAH skillset and further diversify OIG workforce.

Implementation monitoring status – discarded/open/completed: (Time 2)

Comments on implementation status: (Time 2)

Final implementation monitoring status – discarded/open/completed: (Time 3)

Final comments on implementation status: (Time 3)

Recommendation #7 (linked recommendation #12 and #20)
Efficiency: Recommendation 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.

Responsible unit(s): OOM

Support unit(s): DG, DDG-MR, MiRAC Committee

Management response – Partially accept

Organization needs to ensure that OOM is adequately funded to materialize the decentralization of the Office by creating new Conflict Resolution Officer positions in selected missions and accompanying support staff to help with the coordination of the respectful workplace focal point network; This would serve to enable OOM to provide a better service, closer to IOM personnel.

Key actions: Funding would need to be secured through the allocation of additional administrative budget lines, OSI, or MIRAC funding within the budgetary reform process.

² Discussions with the Executive Office are ongoing on the question of OIG field office presence.

³ 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.

<p>Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i></p> <p>Comments on implementation status: <i>(Time 2)</i></p>
<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p> <p>Final comments on implementation status: <i>(Time 3)</i></p>
<p>Recommendation #8 Efficiency: Recommendation 5.6</p>
<p>DHR 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.</p>
<p>Responsible unit(s): DHR</p>
<p>Management response – Partially accept</p> <p><i>DHR currently has a locally recruited position in place in MHRO-REC who deals with Clearcheck across the Organization. DHR does not have the capacity to expand our checks/due diligence activities. Should DHR be provided with additional resources, such resources would be welcome.</i></p> <p>Key actions: DHR will continue to support the work of the PSEAH Task Force within available (and limited) resources and would be happy to increase support should additional resources be provided.</p>
<p>Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i></p> <p>Comments on implementation status: <i>(Time 2)</i></p>
<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p> <p>Final comments on implementation status: <i>(Time 3)</i></p>
<p>Recommendation #9 Efficiency: Recommendation 5.7</p>
<p>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.</p>
<p>Responsible unit(s): LEG Support from: DHR</p>
<p>Management response - Partially accept</p>

In addition to the disciplinary work conducted by the General and Administrative Law Division in LEG, including with respect to SEAH cases, two P-2 Legal Officers are already assigned as members of the PSEAH Task Force, under the supervision of senior legal staff, to address requests for support relating to this matter (review of contractual clauses, support to PSEAH Task Force work, etc.). LEG does not have the spare capacity to assign more staff to PSEA now. Should LEG be provided with additional resources, such resources would be welcome; however, the provision of junior level personnel such as JPO and UNVs would not fill the need for consistent capacity to undertake senior level responsibilities of policy review and advice.

Key actions: LEG will continue to support the work of the PSEAH Task Force within available resources and to increase support should additional resources be provided.

Implementation monitoring status – discarded/open/completed: *(Time 2)*

Comments on implementation status: *(Time 2)*

Final implementation monitoring status – discarded/open/completed: *(Time 3)*

Final comments on implementation status: *(Time 3)*

Recommendation #10
Efficiency: Recommendation 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.

Responsible unit(s): PSEAH

Support from: Department Leads, Programme Leads, Project Managers, ERM, DFAM, RO, RD, CO, CoM/HoO, DOE (inter-agency PSEA)

Management response – **Accept**

Key actions: Develop tools, indicators and systems for the rollout of risk management approach (evidenced-based) on PSEAH in coordination and with the support of ERM; Collect risk management indicators globally, analyse, assess, and coordinate with respective Country Offices/programmes, particularly those identified as very high and high risk (updated on yearly basis); Continually work toward ensuring that there are dedicated PSEA Officers in place within very high and high risk locations; strengthen the capacity of staff on strategic engagement with PSEA inter-agency structures and leadership in high risk settings.

Implementation monitoring status – discarded/open/completed: *(Time 2)*

Comments on implementation status: *(Time 2)*

Final implementation monitoring status – discarded/open/completed: *(Time 3)*

<p>Final comments on implementation status: <i>(Time 3)</i></p>
<p style="text-align: right;">Recommendation #11 Efficiency: Recommendation 5.10</p> <p>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.</p>
<p>Responsible unit(s): PSEAH Support from: Regional Directors and COMs</p>
<p>Management response – Accept</p> <p>Key actions: Continually update the PSEA Focal Point list, as required (as staff transfer, leave IOM, or in the event that a staff without the technical expertise is nominated; Periodically review the IOM PSEA Focal Point list to ensure the correct profile is in place (not HR practitioners).</p>
<p>Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i></p> <p>Comments on implementation status: <i>(Time 2)</i></p>
<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p> <p>Final comments on implementation status: <i>(Time 3)</i></p>
<p style="text-align: right;">Recommendation #12 <i>(linked recommendation #7 and #20)</i> Efficiency: Recommendation 5.11</p> <p>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.</p>
<p>Responsible unit(s): PSEAH Support from: OOM</p>
<p>Management response – Accept</p> <p>Key actions: Organize meeting between PSEAH Unit and OOM; Develop a plan for the way forward and communicate accordingly; This plan is to be implemented without prejudice towards OOM’s Charter, particularly with regards to its independence, confidentiality, impartiality and neutrality, and informality, which also applies to its Respectful Workplace Focal Points (RWFP).</p>
<p>Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i></p>

Comments on implementation status: *(Time 2)*

Final implementation monitoring status – discarded/open/completed: *(Time 3)*

Final comments on implementation status: *(Time 3)*

Recommendation #13
Sustainability: Recommendation 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).

Responsible unit(s): [DG](#), [DDG-MR](#)

Support from: [PSEAH](#)

Management response – [Accept](#)

Key actions: [Advocate for core resources to support PSEAH strengthening globally; Develop proposals \(MIRAC, IGF\) as required; Develop a plan to meet with donors; arrange bilateral meetings with donors \(FCDO, Netherlands, Friends of SH\), permanent missions/governments \(Japan, Norway, Finland, Switzerland, Netherlands, Canada, Australia, etc\); Continually meet with donors to present on progress and needs; Fundraising plan \(tracking system\) - proposals, responses, meetings, etc.](#)

Implementation monitoring status – discarded/open/completed: *(Time 2)*

Comments on implementation status: *(Time 2)*

Final implementation monitoring status – discarded/open/completed: *(Time 3)*

Final comments on implementation status: *(Time 3)*

Recommendation #14
Sustainability: Recommendation 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.

<p>Responsible unit(s): DDG-MR and PSEAH Support from: DSPOP, IGF, MiRAC Committee</p>
<p>Management response – Accept</p> <p>Key actions: Develop fundraising plan and organize targeted meetings with key donors on funding support for PSEAH; Work with L3 response to ensure integration of PSEA within core L3 budgets; Development of PSEAH concept notes and proposals to submit; Integration of PSEA within IOM proposals and budgets.</p>
<p>Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i></p> <p>Comments on implementation status: <i>(Time 2)</i></p>
<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p> <p>Final comments on implementation status: <i>(Time 3)</i></p>
<p>Recommendation #15 Sustainability: Recommendation 7.3</p>
<p>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.</p>
<p>Responsible unit(s): PSEAH Support from: Programme and Project Leads/Managers, RD, CoM/HoO, RO, CO, DOE, DPSMM, DPDC</p>
<p>Management response – Accept</p> <p>Key actions: Integration of PSEA within IOM proposals and budgets; develop training modules for managers, emergency coordinators, project developers and other senior staff and rollout globally; ensure PSEA integration in IOM Project Handbook revision and IOM management systems so that it becomes institutionalized.</p>
<p>Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i></p> <p>Comments on implementation status: <i>(Time 2)</i></p>
<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p> <p>Final comments on implementation status: <i>(Time 3)</i></p>
<p>Recommendation #16 Sustainability: Recommendation 7.4</p>

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.

Responsible unit(s): DOE

Support from: RD, CoM/HoO, RO/CO, Department and Division Leads, Programme Leads/Project Managers, DPSMM, PSEAH

Management response – Accept

Key actions: Work with L3 response to ensure integration of PSEA within core L3 budgets; Integration of PSEA within IOM proposals and budgets; train managers, project developers and other senior staff; ensure PSEA integration in IOM Project Handbook revision.

Implementation monitoring status – discarded/open/completed: (Time 2)

Comments on implementation status: (Time 2)

Final implementation monitoring status – discarded/open/completed: (Time 3)

Final comments on implementation status: (Time 3)

Recommendation #17
Sustainability: Recommendation 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.

Responsible unit(s): IGF

Support from: PSEAH

Management response – Accept

IGF allocated funds to hire a Victim Care Officer at P5 level for 12 months. It is however noted that, as the current IGF Workplan is close to completion, it is likely that the next phase of IGF reform will shape, going forward, the way IGF currently supports such reform initiatives, including the work of PSEAH (i.e. allocating unearmarked funding to specific reform initiatives).

Key actions: PSEAH Unit to provide periodic progress update on the use of fund for the Victim Care Officer to IGF; Continue to explore synergies with IGF through the Working Groups on IGF and on Accountability during the Transition period; Develop the new phase of IGF reform agenda taking into consideration of recommendations on PSEAH by external evaluations.

Implementation monitoring status – discarded/open/completed: *(Time 2)*

Comments on implementation status: *(Time 2)*

Final implementation monitoring status – discarded/open/completed: *(Time 3)*

Final comments on implementation status: *(Time 3)*

Recommendation #18
Sustainability: Recommendation 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.

Responsible unit(s): PSEAH

Support from: Units responsible for PRIMA and Project Handbook revision, ERM, DPSMM

Management response – **Accept**

Key actions: Active involvement in the Project Handbook committee to integrate PSEAH within project cycle management globally; Develop a RO Regional Thematic Specialist (RTS) and CO checklist for reviewing proposals and budgets to ensure PSEA is systematically embedded where risk is determined; Contribute to ongoing guidance as required; Advocate for the inclusion of PSEAH within the PRIMA system and the rollout of new guidance and procedures; Ensure PSEAH risks are identified at both project development, endorsement and implementation level, with risk treatment plans in place from the onset.

Implementation monitoring status – discarded/open/completed: *(Time 2)*

Comments on implementation status: *(Time 2)*

Final implementation monitoring status – discarded/open/completed: *(Time 3)*

Final comments on implementation status: *(Time 3)*

Pillar 2: Institutional Accountability and Transparency

Recommendation #19
Relevance: Recommendation 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 processes⁴. The application of a human-centered design⁵ 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.

Responsible unit(s): PSEAH

Support from: DOE (AAP), DOE (GBV), DOE (inter-agency PSEA), PDX, all Heads of Departments/Divisions

Management response – Partially Accept

Policy development is very high level; however, consideration could be given to affected populations/victims during the development of guidance or other standard operating procedures, in a way that is safe and ethical.

Key actions: Contribute feedback from engagement with in-country practitioners about community needs to the development of guidance and SOPs.

Implementation monitoring status – discarded/open/completed: (Time 2)

Comments on implementation status: (Time 2)

Final implementation monitoring status – discarded/open/completed: (Time 3)

Final comments on implementation status: (Time 3)

Recommendation #20 (linked recommendations #7, #12, #21, #23)

Relevance: Recommendation 1.2

IN/90 rev 1: Policy for a Respectful Working Environment

Enhance IN/90 Rev.1 in a potential follow-up update or in the roll-out of the guidelines:

- 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 areas⁶;

⁴ For guidance and good practices in giving communities an active role in these processes, please refer to: <https://empoweredaid.gwu.edu/>

⁵ 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.](#)

⁶ “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).

<ul style="list-style-type: none"> 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 Working Environment Focal Points); 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; 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 avenues⁷, gender-sensitive mediation processes that take into account victims’ needs and priorities, including mediator, venue, peer-support, psychological support⁸, etc.); f. Establish links and develop specific technical guidance to inform and support the collective delivery of IOM’s approach on sexual harassment.
<p>Responsible unit(s): DHR Support from: OOM</p>
<p>Management response – Not accept</p> <p><i>Given that IN/90 rev 1 was just revised and launched and DHR is currently halfway through the roll out of a Trainer of Trainers on the new Instruction (IN/90), there are no plans to update the content. If feasible, some of these recommendations may be taken on board within other IOM guidance and tools developed.</i></p> <p><i>Additionally, not in agreement with the expansion of the role of Respectful Workplace Focal Points which may be in violation of other – already established – mandatory policies (IN/204 rev 1 and IN/265).</i></p> <p>Key actions:</p>
<p>Implementation monitoring status – discarded/open/completed: (Time 2)</p> <p>Comments on implementation status: (Time 2)</p>
<p>Final implementation monitoring status – discarded/open/completed: (Time 3)</p> <p>Final comments on implementation status: (Time 3)</p>
<p>Recommendation #21 ((linked to recommendations #20 and #23) Relevance: Recommendation 1.3</p>

⁷ 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.

⁸ “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.](#)

IN/234: Policy and Procedures for Preventing and Responding to Sexual Exploitation and Abuse:

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 areas⁹);
- 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 IOM vision, guiding principles and operationalization of IOM victim-centered approach to 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;
- e. Clarify and ensure coherence and complementarity between the PSEA Policy and other IOM instructions (IN/90 Rev. 1¹⁰, IN/282¹¹, IN/275¹²);
- 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 entities¹³.
- 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.

Responsible unit(s): PSEAH

Support from: DHR, DFAM, LEG, OIG, PROC, ECO, ERM

Management response – Partially accept

Not all recommendations are appropriate to integrate within the policy document itself but could be included in operational guidance to support the implementation of the policy.

⁹ “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).

¹⁰ 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.

¹¹ IOM, Policy for Protection against retaliation for reporting misconduct or cooperating with investigations and audits (IN/282), 2022.

¹² IOM, Reporting and Investigation of Misconduct Framework (IN/275), 2019.

¹³ For example, UNFPA, UNICEF, WFP, UNHCR; for reference, please refer to Annex A.

The recommendation in (b) is accepted to the extent that the prohibition of sexual relationships is consistent with the IASC principle that “4. Any sexual relationship between those providing humanitarian assistance and protection and a person benefitting from such humanitarian assistance and protection that involves improper use of rank or position is prohibited.”

Additionally, it should be reflected that the disclosure of a sexual relationship with a beneficiary to ECO is not per se a sufficient requirement for the non-prohibition of the relationship. Detailed wording would need to be adopted.

Key actions:

Point a: Revise IN/234

Point b: Revise IN/234

Point c: To be addressed under recommendation 4.10 Key action (a)

Point d: To be address under recommendation 5.9

Point e: Revise IN/234

Point f: To be addressed under recommendation 4.10 Key action (a)

Point g: Revise IN/234

Point h: Revise IN/234

Implementation monitoring status – discarded/open/completed: *(Time 2)*

Comments on implementation status: *(Time 2)*

Final implementation monitoring status – discarded/open/completed: *(Time 3)*

Final comments on implementation status: *(Time 3)*

Recommendation #22 *(linked to recommendations #28 and #31)*

Relevance: Recommendation 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

Responsible unit(s): PSEAH

Support from: ERM, DOE, DPSMM, DPDC, DOE (interagency PSEA), DOE (GBV)

Management response – **Accept**

Key actions: Develop a risk analysis approach, prioritization and mitigation framework informs IOM programming from project development, endorsement and implementation, providing key indicators on risk trends or red flags to enable IOM’s oversight; rollout globally; Align with ERM Unit’s yearly risk management workplan to identify key IOM operations, projects and programmes, enabling the early identification of PSEAH resource and capacity needs; Integrate DOE’s feedback from conversations with practitioners conveying country level operational priorities into IOM strategies.

Implementation monitoring status – discarded/open/completed: *(Time 2)*

Comments on implementation status: <i>(Time 2)</i>
Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i>
Final comments on implementation status: <i>(Time 3)</i>
Recommendation #23 <i>(linked to recommendations #2, #20, #21)</i> Internal Coherence: Recommendation 2.3
<p>Under the steer of senior leadership, the revision of IN/234 (and potential future revisions of IN/90 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.</p>
Responsible unit(s): PSEAH Support from: PSEAH Taskforce members, including DHR, LEG, etc
Management response – Accept Key actions: Include agenda items within the IOM HQ PSEAH Task Force, and where required organize sub-working groups to move forward with PSEAH deliverables, including those linked to policy revisions.
Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i>
Comments on implementation status: <i>(Time 2)</i>
Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i>
Final comments on implementation status: <i>(Time 3)</i>
Recommendation #24 Effectiveness: Recommendation 4.6
<p>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. <i>if the mission has Protection expertise/capacity, etc.</i>).</p>
Responsible unit(s): DOE (AAP) Support from: OIG, PSEAH, LEG, DOE (GBV)
Management response – Accept

Key actions: Review and update of CFM manual produced by AAP in implementing local CFMs that take into account the safe and confidential transfer of SEA to WAAI across operations; Mapping and review of CFMs proliferating in IOM worldwide through a TWG composed PSEA, AAP, OIG, LEG, and GBV as core members; PSEAH to create SOPs, in line with CFM Manual.

Implementation monitoring status – discarded/open/completed: *(Time 2)*
Comments on implementation status: *(Time 2)*

Final implementation monitoring status – discarded/open/completed: *(Time 3)*
Final comments on implementation status: *(Time 3)*

Recommendation #25
Effectiveness: Recommendation 4.8

While respecting OIG’s independence and confidentiality, transparency and coordination between OIG and other units is important to clarify OIG’s internal processes. SOPs could be a great opportunity to test a more collaborative approach, for example, these could be shared for comments or collectively developed. Clarity from OIG on its internal processes, which do not include aspects related to specific cases, would contribute to making the work of others more effective, especially in areas of overlap, helping to foster trust in the system.

Responsible unit(s): OIG

Management response – **Accept**

Key actions: Preparation and implementation of the SOP on investigations with a victim-centred approach; request input from PSEAH Unit on key actions for a VCA in SEA and SH investigations; Collaborate with PSEAH Unit and LEG regarding information sharing on Victim Assistance and the Resident Coordinator system; Continue participation in outreach, training and awareness raising initiatives; update and expand the content of WAAI, Intranet and IOM website.

Implementation monitoring status – discarded/open/completed: *(Time 2)*
Comments on implementation status: *(Time 2)*

Final implementation monitoring status – discarded/open/completed: *(Time 3)*
Final comments on implementation status: *(Time 3)*

Recommendation #26
Efficiency: Recommendation 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.

Responsible unit(s): PSEAH

Support from: USRAP, GHAP, Department Leads, Programme Leads, COs

Management response – Accept

Key actions: The risk management tools that are being created at: a) country context level; b) IOM operational context level; and c) programme/project level will be useful in ensuring that PSEA is integrated where risk is high or very high; Additionally, IOM's PRIMA/PRISM system will be strengthened to integrate PSEA so that PSEA is considered within proposals and budgets, no matter the sector.

Implementation monitoring status – discarded/open/completed: (Time 2)

Comments on implementation status: (Time 2)

Final implementation monitoring status – discarded/open/completed: (Time 3)

Final comments on implementation status: (Time 3)

Recommendation #27
Internal Coherence: Recommendation 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.

Responsible unit(s): DOE (inter-agency PSEA)

Support from: GBV, GDU, PSEAH

Management response – Accept

Key actions: With the PSEAH Unit, develop a procedure for regular / weekly coordination and systematic information sharing to facilitate identification of areas where lessons learnt, strategies, and best practices from the Safe from the Start project can inform the work of the PSEAH unit (methodology to be determined); Monitor and ensure regular coordination as per the defined methodology, to be conceived with the PSEAH unit.

Implementation monitoring status – discarded/open/completed: (Time 2)

Comments on implementation status: (Time 2)

Final implementation monitoring status – discarded/open/completed: (Time 3)

Final comments on implementation status: (Time 3)

Recommendation #28 (linked to recommendations #22 and #31)
Effectiveness: Recommendation 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 framework¹⁴, suitable to the realities and capacities of IOM;
- b) Ensure that the framework is consistently used to inform operations and programming;
- 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.

Responsible unit(s): PSEAH
Support from: ERM, DOE, DPSMM, DPDC

Management response – Accept

Key actions: Develop a risk analysis approach, prioritization and mitigation framework informs IOM programming from project development, endorsement and implementation, providing key indicators on risk trends or red flags to enable IOM’s oversight; rollout globally.

Implementation monitoring status – discarded/open/completed: (Time 2)

Comments on implementation status: (Time 2)

Final implementation monitoring status – discarded/open/completed: (Time 3)

Final comments on implementation status: (Time 3)

Recommendation #29
Effectiveness: Recommendation 4.5

Similar to WFP’s Navex reporting platform, 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). 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.

¹⁴ Action on this recommendation has already been initiated through the second deliverable of the PSEAH Evaluation consultancy.

<p>Responsible unit(s): OIG Support from: PSEAH, LEG, ECO, ICT</p>
<p>Management response – Partially accept</p> <p><i>Point b not accepted – WAAI, OIG Intake email and individual Investigator contacts already provide confidential channels and can be used for anonymous reporting/communication. It is not clear what the added value of a Navex system would be for mobile populations. Moreover, an analysis of the UN’s iReport portal indicates that WFP’s reporting system has not resulted in greater effectiveness or efficiency in handling complaints as compared with similarly situated agencies.</i></p> <p>Key actions: Update and expand WAAI platform and modify reporting form; recruit a P2 WAAI officer and focal point; address technical challenges of the platform; Any update and expansion of the We Are All In Platform should be in line with the IOM Data Protection Principles and include appropriate consent language for any referrals made through the platform.</p>
<p>Implementation monitoring status – discarded/open/completed: (Time 2)</p> <p>Comments on implementation status: (Time 2)</p>
<p>Final implementation monitoring status – discarded/open/completed: (Time 3)</p> <p>Final comments on implementation status: (Time 3)</p>
<p>Recommendation #30 Effectiveness: Recommendation 4.7</p>
<p>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</p>
<p>Responsible unit(s): DDG-O and DOE (AAP) Support from: PSEAH, DOE (GBV), interagency PSEA) RO, CO, LEG</p>
<p>Management response – Accept</p> <p>Key actions: Advocate for adequate AAP resourcing and dedicated staffing in L2/L3 operations to effectively integrate principles of AAP and build trust in communities through inclusive participation to strengthen SEA prevention and response; Build an AAP roster in IOM for surge deployments to crisis operations; Conduct joint AAP-PSEA trainings and regularly improve the integration of PSEA in AAP trainings across IOM to enhance interlinkages and culture of accountability in the organization. Consolidate lessons learnt and best practices of PSEA integrated in AAP work and AAP-PSEA collaborations in programmes and operations.</p>
<p>Implementation monitoring status – discarded/open/completed: (Time 2)</p> <p>Comments on implementation status: (Time 2)</p>

<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p> <p>Final comments on implementation status: <i>(Time 3)</i></p>
<p>Recommendation #31 <i>(linked to recommendations #22 and #28)</i> Sustainability: Recommendation 7.6</p>
<p>Ensure consistent and systematic implementation of PSEA risk-informed approach within operations and programmes</p>
<p>Responsible unit(s): PSEAH Support from: ERM, DOE, DPSMM, DPDC</p>
<p>Management response – Accept</p> <p>Key actions: Develop and rollout tool which assesses SEAH at the country level, IOM operational level, and programme/project level; Additionally create sector specific checklists to ensure that mitigation measures to address SEAH risks are put in place; Contribute to the revision of the IOM Project Handbook to ensure that PSEAH is embedded, particularly within the risk management section; With the support of the ERM Unit, ensure the identification, prioritization and mitigation of PSEAH risks are captured in all IOM’s risk assessments and registers.</p>
<p>Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i></p> <p>Comments on implementation status: <i>(Time 2)</i></p>
<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p> <p>Final comments on implementation status: <i>(Time 3)</i></p>
<p>Recommendation #32 Sustainability: Recommendation 7.7</p>
<p>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. 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.</p>
<p>Responsible unit(s): PSEAH Support from: DDG-MR, DDG-O</p>
<p>Management response – Accept</p>

<p>Key actions: Extend PSEAH Task Force invite to include policy team; ensure that the DDGs alternate chairing the PSEAH Task Force; Establish a system to regularly coordinate with DDG for Operations.</p>
<p>Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i></p> <p>Comments on implementation status: <i>(Time 2)</i></p>
<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p> <p>Final comments on implementation status: <i>(Time 3)</i></p>
<p>Recommendation #33 Sustainability: Recommendation 7.9</p>
<p>Establish and institutionalize minimum requirements for PSEA in L3 emergencies.</p>
<p>Responsible unit(s): DOE Support from: DDG – O, PSEAH, MEC</p>
<p>Management response – Accept</p>
<p>Key actions: Create new policy and tools around IOM’s response in L3 crises; ensure that reference is made to PSEA within L3/L2 emergencies, including that PSEA is integrated from the start of any crises.</p>
<p>Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i></p> <p>Comments on implementation status: <i>(Time 2)</i></p>
<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p> <p>Final comments on implementation status: <i>(Time 3)</i></p>
<p>Pillar 3: Capacity Development, Behaviour Change and Communications</p>
<p>Recommendation #34 Effectiveness: Recommendation 4.2</p>
<p>IOM’s senior organizational leadership and the PSEAH Unit should make more systematic strategic use of communications.</p> <ol style="list-style-type: none"> 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 messaging¹⁵ 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

¹⁵ Annex C provides examples of powerful communications sent by key UNFPA departments and senior leadership to all staff which can be used for inspiration.

<p>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 motivated¹⁶. 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.</p>
<p>Responsible unit(s): PSEAH Support from: EO, DG, DDG-MR, DDG-O, DOE (Inter-Agency PSEA)</p>
<p>Management response – Accept</p> <p>Key actions: Develop and distribute regular newsletters on PSEA developments including developments at the inter-agency level, organize brown bags/drop-in hours and online learning opportunities for field staff on policy/technical and operational developments; develop and rollout PSEA webinars to support and strengthen the IOM PSEA community; A Yammer group (now Viva Engage) is already being used and is active amongst PSEA practitioners.</p>
<p>Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i></p> <p>Comments on implementation status: <i>(Time 2)</i></p>
<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p> <p>Final comments on implementation status: <i>(Time 3)</i></p>
<p style="text-align: right;">Recommendation #35 Effectiveness: Recommendation 4.3</p> <p>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:</p> <ul style="list-style-type: none"> 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 Workplace 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?). 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).

¹⁶ Please consult [the WFP mid-year highlights example](#).

d) Given that IN/90 rev 1 has been already launched, train Manila DHRM and Office of Staff Security staff on aspects related to SH.
Responsible unit(s): PSEAH Support from: EO, DHR, OOM, ECO, OSS, SWO, OIG, LEG, OHU
Management response – Accept Key actions: Develop and roll-out a global communication campaign on sexual harassment; include SH in PSEA trainings where applicable; write guidance notes on SH victim assistance standards and on the implementation of the victim-centered approach in IOM; Develop guidance with OSS/DHR/LEG/ECO/OIG on how to ensure security and protection of survivors during and after investigations; With OHU/HR revise occupational accident reporting process and access to services through insurance for SH survivors, including non-staff personnel (consultants, interns, third party contracted staff).
Implementation monitoring status – discarded/open/completed: (Time 2) Comments on implementation status: (Time 2)
Final implementation monitoring status – discarded/open/completed: (Time 3) Final comments on implementation status: (Time 3)
Recommendation #36 Efficiency: Recommendation 5.12
<p>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.</p>
Responsible unit(s): PSEAH Support from: relevant units (as required)
Management response – Partially accept <i>IOM PSEAH Unit translates as much as possible into French, Spanish and Arabic. Traditionally IOM does not translate policies.</i> Key actions: Prioritize the translation of PSEAH guidance, tools, and trainings into French, Spanish and Arabic at a minimum.
Implementation monitoring status – discarded/open/completed: (Time 2) Comments on implementation status: (Time 2)
Final implementation monitoring status – discarded/open/completed: (Time 3) Final comments on implementation status: (Time 3)

<p>Recommendation #37 Efficiency: Recommendation 5.13</p>
<p>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).</p>
<p>Responsible unit(s): PSEAH Support: DOE (PSEA Inter-Agency), ERM</p>
<p>Management response – Accept</p> <p>Key actions: Support development and delivery of facilitated and self-paced trainings to introduce Focal Points and Officers to their role and responsibilities, including the IOM PSEAH Toolkit content (examples: risks, mainstreaming PSEA in the project cycle and budgets, raising awareness, supporting IPs, communicating with communities, CFMs, victim assistance/VCA/responding to disclosures, etc.)). Additional webinars to focus on risk management and inter-agency PSEA structures and frameworks, strategic engagement with inter-agency PSEA leadership in-country, engagement with PSEA Network members.</p>
<p>Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i></p> <p>Comments on implementation status: <i>(Time 2)</i></p>
<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p> <p>Final comments on implementation status: <i>(Time 3)</i></p>
<p>Recommendation #38 <i>(linked to recommendations #39, #53 and #54)</i> Efficiency: Recommendation 5.14</p>
<p>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.</p>
<p>Responsible unit(s): PSEAH Support from: MCU, DOE (inter-agency PSEA), RO, RD, CO, CoM/HoO</p>
<p>Management response – Accept</p>

<p>Key actions: Modules on PSEAH will be developed for senior managers (starting first with PSEA) and rolled out; PSEAH to reach out to the Regional Directors to ensure PSEAH is part of yearly RO meetings to ensure that IOM leadership (CoM/HoO) receive dedicated sessions; guidance and SOPs developed and rolled out outlining the process for sharing of non-identifying information on SEA allegations with RC/HC, in line with the UN Management Accountability Framework (MAF); Support development of induction package / training tools through the integration of key content on inter-agency PSEA structures and frameworks, strategic engagement with inter-agency PSEA leadership in-country, engagement with PSEA Network members.</p>
<p>Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i></p> <p>Comments on implementation status: <i>(Time 2)</i></p>
<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p> <p>Final comments on implementation status: <i>(Time 3)</i></p>
<p>Recommendation #39 <i>(linked to recommendation #38)</i> Efficiency: Recommendation 5.15</p>
<p>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.</p>
<p>Responsible unit(s): PSEAH Support from: EO, RO, RD, CO, CoM/HoO, DOE, relevant units (as required)</p>
<p>Management response – Accept</p> <p>Key actions: Create, pilot (and then refine) a training for IOM senior managers, including CoMs which focuses on the leadership role of senior staff on PSEAH, integration of PSEA in IOM and programmes/projects, etc; Create, pilot, and refine a training for Emergency Coordinators; Ensure that PSEAH is embedded in other trainings, workshops and guidance materials and tools as applicable.</p>
<p>Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i></p> <p>Comments on implementation status: <i>(Time 2)</i></p>
<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p> <p>Final comments on implementation status: <i>(Time 3)</i></p>
<p>Recommendation #40 Impact: Recommendation 6.1</p>

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.

Responsible unit(s): PSEAH

Support from: DOE (interagency PSEA team) and other entities, as required

Management response – Partially accept

This will not be considered a separate recommendation but rather it will be addressed through other recommendations.

Key actions: PSEAH HQ Task Force (different units/departments) to review and validate key strategic and guidance documents, tools and materials on PSEA and SH - this includes not only what is created by the PSEAH Unit but also by other Units/Departments that may have an impact and/or link to PSEAH.

Implementation monitoring status – discarded/open/completed: (Time 2)

Comments on implementation status: (Time 2)

Final implementation monitoring status – discarded/open/completed: (Time 3)

Final comments on implementation status: (Time 3)

Recommendation #41
Efficiency: Recommendation 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.

Responsible unit(s): OIG

Support from: PSEAH, ECO, LEG, DHR, OOM, SWO, OSS, OHU

Management response – Partially accept

OIG does not have the mandate to develop an M&E framework.

Key actions: Establish a system of feedback for learning from specific cases, in line with OIG's confidentiality and due process requirements as well as OIG's available resources.

Implementation monitoring status – discarded/open/completed: (Time 2)

Comments on implementation status: (Time 2)

<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p> <p>Final comments on implementation status: <i>(Time 3)</i></p>
<p>Recommendation #42 Efficiency: Recommendation 6.3</p>
<p>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 leadership.</p>
<p>Responsible unit(s): PSEAH Support from: RBM, relevant units (as required)</p>
<p>Management response – Accept</p> <p>Key actions: Develop and disseminate survey on sexual harassment which will capture changes in attitudes and behaviours; Strengthen checklist section of the Toolkit; Review indicators and coordinate revisions with RBM; Develop M&E framework to assess implementation of IOM’s victim-centred approach.</p>
<p>Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i></p> <p>Comments on implementation status: <i>(Time 2)</i></p>
<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p> <p>Final comments on implementation status: <i>(Time 3)</i></p>
<p>Recommendation #43 Efficiency: Recommendation 6.5</p>
<p>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 staff¹⁷.</p>
<p>Responsible unit(s): PSEAH Support from: LEG and DHR</p>
<p>Management response – Partially accept</p>

¹⁷ 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’ [ROSA](#), [GBV/SOP Respond developed in Lebanon](#), [GBV Pocket Guide](#).

IOM evidence indicates mobile applications are not the best modality for use in remote locations

Key actions: Develop and disseminate IOM PSEAH quarterly newsletters highlighting key messages, best practices, and provide practical guidance.

Implementation monitoring status – discarded/open/completed: *(Time 2)*

Comments on implementation status: *(Time 2)*

Final implementation monitoring status – discarded/open/completed: *(Time 3)*

Final comments on implementation status: *(Time 3)*

Pillar 4: Quality and accessible victim assistance

Recommendation #44
Relevance: Recommendation 1.4

Address major gaps in IOM’s implementation of the victim-centered approach to PSEAH.

Responsible unit(s): PSEAH

Support from: OIG, LEG, ECO, DHR, SWO, OOM, EO

Management response – **Accept**

Key actions: As detailed below in each of the Pillar 4 recommendations

Overarching Key Action: Develop statement defining IOM’s victim-centered approach; Develop guidance note on implementation of victim-centred approach in IOM.

Implementation monitoring status – discarded/open/completed: *(Time 2)*

Comments on implementation status: *(Time 2)*

Final implementation monitoring status – discarded/open/completed: *(Time 3)*

Final comments on implementation status: *(Time 3)*

Recommendation #45
Relevance: Recommendation 1.7

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

Responsible unit(s): PSEAH

Support from: GDU, Protection, GBV

Management response – **Accept**

Key actions: In coordination with GDU, develop/integrate and rollout guidance note on access to victim assistance for people with diverse SOGIESC.

Implementation monitoring status – discarded/open/completed: *(Time 2)*

Comments on implementation status: *(Time 2)*

Final implementation monitoring status – discarded/open/completed: *(Time 3)*

Final comments on implementation status: *(Time 3)*

Recommendation #46
External Coherence: Recommendation 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.

Responsible unit(s): DOE (GBV)

Support from: EO (DDG-O), with support from DPSMM, CO/RO, PSEAH

Management response – **Accept**

Key actions: Advocate for investment in GBV dedicated programming where feasible with donors, senior management at HQ, RO and CO and support missions; In locations where there is no GBV programming or protection staff, invest in local organizations, preferably women-led organizations to who may be best placed to provide the support.

Implementation monitoring status – discarded/open/completed: *(Time 2)*

Comments on implementation status: *(Time 2)*

Final implementation monitoring status – discarded/open/completed: *(Time 3)*

Final comments on implementation status: *(Time 3)*

Recommendation #47 (linked to recommendation #4)
Effectiveness: Recommendation 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/Victim Care Officer ¹⁸ (V/SCO) position responsible for putting SEAH victims' rights and dignity first.
Responsible unit(s): PSEAH Support from: DHR
Management response – Accept
Key actions: Recruit Senior Victim Care Officer to move this recommendation forward; Victim Care Officer to develop workplan with key deliverables, tools, guidance, etc.
Implementation monitoring status – discarded/open/completed: (Time 2)
Comments on implementation status: (Time 2)
Final implementation monitoring status – discarded/open/completed: (Time 3)
Final comments on implementation status: (Time 3)
Recommendation #48 Effectiveness: Recommendation 4.10
<p>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:</p> <ol style="list-style-type: none"> 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 stakeholders¹⁹. 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

¹⁸ 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](#).

¹⁹ 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.

<p>of cases investigated per region, number of cases closed, whether SE or SA, gender, adult/minor, etc.).</p> <p>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.</p> <p>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.</p>
<p>Responsible unit(s): <i>Corresponding to the above (a – e)</i></p> <p>Point a: PSEAH, with the support from EO, DOE, DPSMM, DPDC, OIG, LEG, DHR, ECO, OSS, DFAM</p> <p>Point b: PSEAH, with the support from OSS, DHR, ECO, LEG</p> <p>Point c: OIG, with the support from PSEAH and LEG</p> <p>Point d: PSEAH, with the support from LEG and OIG</p> <p>Point e: PSEAH, with the support from EO, DOE (GBV), DPSMM (PXD)</p>
<p>Management response:</p> <p>Point a: Accept</p> <p>Point b: Accept</p> <p>Point c: Accept</p> <p>Point d: Accept</p> <p>Point e: Accept</p> <p>Key actions:</p> <p>Point a: Develop institutional statement on IOM’s victim centre approach; guidance note on implementation of victim centred approach in IOM (key performance indicators for: elevating voices of survivors, workplace culture, design & implementation of projects, formal/informal complaint handling process, victim assistance, disciplinary action etc)</p> <p>Point b: Develop guidance with OSS/DHR/LEG/ECO/OIG on how to ensure security and protection of survivors during and after investigations</p> <p>Point c: The final draft of the victim assistance protocol has already been developed by OIG and PSEAH unit in collaboration with LEG. This protocol allows for the PSEAH unit to have a strengthened overview of SEA trends and patterns. Additional resources are required for OIG and PSEAH unit to launch the additional protocol, including for effective and timely reporting, facilitation of victim assistance and raising awareness IOM-wide on victim assistance and cooperation with OIG.</p> <p>Point d: Address standardized approach to information sharing with SEAH survivors within guidance note on implementation of victim-centred approach to be developed under point a</p> <p>Point e: Develop briefing note on institutional standards and funding for SEAH assistance.</p>
<p>Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i></p>
<p>Comments on implementation status: <i>(Time 2)</i></p>
<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p>

<p>Final comments on implementation status: <i>(Time 3)</i></p>
<p style="text-align: right;">Recommendation #49 Effectiveness: Recommendation 4.11</p> <p>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.</p>
<p>Responsible unit(s): PSEAH Support from: DHR, OHU, SWO, GSAC, NSAC, ECO, OOM</p>
<p>Management response – Accept</p> <p>Key actions: Identify available resources and assistance services available for IOM staff, including non-staff personnel and the channels to access them; Create an easy-to-understand visual; Develop internal guidance note on SH victim assistance standards; Review and revise internal processes, tools and guidance. .</p>
<p>Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i></p> <p>Comments on implementation status: <i>(Time 2)</i></p>
<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p> <p>Final comments on implementation status: <i>(Time 3)</i></p>
<p style="text-align: right;">Recommendation #50 Effectiveness: Recommendation 4.12</p> <p>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.</p>
<p>Responsible unit(s): PSEAH Support from: DOE (GBV), DPSMM (PXD)</p>
<p>Management response – Accept</p> <p>Key actions: Develop SEA Victim Assistance guidance note and SOPs; Develop and rollout training materials and tools for responding to SEA disclosures and facilitating victim assistance referrals</p>
<p>Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i></p> <p>Comments on implementation status: <i>(Time 2)</i></p>
<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p>

<p>Final comments on implementation status: <i>(Time 3)</i></p>
<p style="text-align: right;">Recommendation #51 Effectiveness: Recommendation 4.13</p> <p>Develop M&E framework to assess implementation of IOM’s victim-centered approach, conduct periodic reviews and iterate, as required.</p>
<p>Responsible unit(s): PSEAH Support from: ERM, RBM, DOE (GBV, AAP), DPSMM (PXD)</p>
<p>Management response – Accept</p> <p>Key actions: Develop M&E framework to assess implementation of IOM’s victim-centred approach, as required; Adjust indicators in IOM’s strategic results framework, in coordination with Results-Based Management Unit and Enterprise Risk Management Unit.</p>
<p>Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i></p> <p>Comments on implementation status: <i>(Time 2)</i></p>
<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p> <p>Final comments on implementation status: <i>(Time 3)</i></p>
<p style="text-align: right;">Recommendation #52 Efficiency: Recommendation 6.4</p> <p>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 confidential manner – trends, patterns, percentages, etc.²⁰ 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.</p>
<p>Responsible unit(s): LEG and PSEAH Support from: EO, OIG</p>
<p>Management response – Accept</p> <p>Key actions: Information Bulletin IB/82, published on an annual basis, includes all disciplinary measures taken during the year, including those imposed on SH and SEA offenders. LEG has been regularly providing statistics on SH and SEA within the framework of audits and meetings with Donors. LEG remains available to provide information on actions it has taken on OIG’s reports and to assist the PSEAH team in its efforts to increase transparency on these matters; the PSEAH Unit will continue to develop and distribute communication to various target groups within IOM (all staff, senior managers, RDs and CoM/HoO, dedicated PSEA Officers/Focal Points, etc).</p>

²⁰ 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.

<p>Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i></p> <p>Comments on implementation status: <i>(Time 2)</i></p>
<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p> <p>Final comments on implementation status: <i>(Time 3)</i></p>
<p>Pillar 5: Partnership and Coordination</p>
<p style="text-align: center;">Recommendation #53 <i>(linked to recommendations #38, #54, #62)</i></p> <p style="text-align: center;">Relevance: Recommendation 1.6</p> <p>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.</p>
<p>Responsible unit(s): PSEAH Support from: DHR</p>
<p>Management response – Partially accept</p> <p><i>IOM cannot ensure standards of external entities; however, IOM can commit to systematically assessing capacity and building the capacity of partners and service providers to meet collective agreed standards</i></p> <p>Key actions: IOM will strengthen its support to TPCs, implementing partners and service providers by putting in place the UN PSEA Common Assessment Tool; roll out the UN Common Assessment Tool starting first with partner agreements where, for example, the staff are directly interacting with beneficiaries, contract value above US\$ 100,000, including during the renewal/contract extension stage; organize meetings with global TPCs to support on PSEA.</p>
<p>Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i></p> <p>Comments on implementation status: <i>(Time 2)</i></p>
<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p> <p>Final comments on implementation status: <i>(Time 3)</i></p>
<p>Recommendation #54 <i>(linked to recommendations #38, #53, #62)</i></p> <p>External Coherence: Recommendation 3.1</p> <p>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:</p>

<p>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;</p> <p>b) 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.</p>
<p>Responsible unit(s): Point a: PSEAH, with support from OIG and LEG Point b: PSEAH, with support from Procurement, CO/RO and OPC</p>
<p>Management response Point a: Accept Point b: Accept</p> <p>Key actions: Point a: Develop a framework and guidance for the sharing of non-identifying case information on SEA with RC/HCs, through the relevant CoM/HoO; implement accordingly. Point b: Develop criteria for the rollout and implementation of the IP capacity assessment, through a phased approach; monitor and strengthen.</p>
<p>Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i></p> <p>Comments on implementation status: <i>(Time 2)</i></p>
<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p> <p>Final comments on implementation status: <i>(Time 3)</i></p>
<p style="text-align: right;">Recommendation #55 Internal Coherence: Recommendation 3.2</p> <p>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.</p>
<p>Responsible unit(s): PSEAH Support from: EO, CO/RO, ERM, DOE (Inter-Agency PSEA), PXD</p>
<p>Management response – Partially accept</p> <p><i>Given that there are human resource capacity constraints to commit more time to interagency processes than what is already being supported; Additionally we continue to share any tools or materials with other agencies.</i></p> <p>Key actions: As much as possible, IOM will continue to contribute to global interagency PSEAH efforts through the UN and IASC.</p>
<p>Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i></p>

Comments on implementation status: <i>(Time 2)</i>
Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i>
Final comments on implementation status: <i>(Time 3)</i>
Recommendation #56 Internal Coherence: Recommendation 3.4
IOM should continue to be an active and strong supporter of PSEA inter-agency efforts at global and 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.
Responsible unit(s): PSEAH Support from: LEG, OIG, DOE (inter-agency PSEA) and other IOM PSEAH Task Force entities as required
Management response – Accept
Key actions: Through 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. SOPs and guidance will be developed to support IOM’s position and distributed accordingly.
Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i>
Comments on implementation status: <i>(Time 2)</i>
Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i>
Final comments on implementation status: <i>(Time 3)</i>
Recommendation #57 Internal Coherence: Recommendation 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.
Responsible unit(s): PSEAH Support from: LEG, DER, PDX
Management response – Partially accept

It is not necessary to ensure that a clause is included in any IOM and UNICEF/UNFPA agreement, given that these two agencies are already officially the “provider of the last resort”.

Key actions: Strengthen PSEAH Toolkit guidance on victim assistance SOPs, referral pathways and information on the provider of the last resort in terms of victim assistance (UNICEF, UNFPA); Consider sending out separate information or including this information within the Quarterly Newsletters which has a section “Did you Know?”

Implementation monitoring status – discarded/open/completed: *(Time 2)*

Comments on implementation status: *(Time 2)*

Final implementation monitoring status – discarded/open/completed: *(Time 3)*

Final comments on implementation status: *(Time 3)*

Recommendation #58
Internal Coherence: Recommendation 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.

Responsible unit(s): PSEAH, in coordination with other UN agencies

Support from: OIG, LEG, DOE (PSEA Inter-Agency)

Management response – **Partially accept**

Work is ongoing within the UN (UN Implementing Partner Working Group) to develop a framework for engaging with governments on PSEA which will benefit IOM

Key actions: IOM to actively attend the UN Implementing Partner Working Group, contribute to the development of tools and adopt/adapt to support government engagement for rollout in IOM; Coordinate internally amongst various IOM entities to ensure that any tools or guidance developed are adapted for use within IOM.

Implementation monitoring status – discarded/open/completed: *(Time 2)*

Comments on implementation status: *(Time 2)*

Final implementation monitoring status – discarded/open/completed: *(Time 3)*

Final comments on implementation status: *(Time 3)*

Recommendation #59
Effectiveness: Recommendation 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.

Responsible unit(s): PSEAH

Support from: DHR, GDU, OIG, SWO, OOM

Management response – Accept

Key actions: IOM co-chairs Workstream 1 (Prevention and Behaviour Science) within the UN CEB Task Force on Prevention of Sexual Harassment; Once the Victim Care Officer is recruited within IOM to support victims of sexual harassment, as well as the P2 JPO in Cairo, develop a plan for communication and training to reach the wider IOM on efforts and support available.

Implementation monitoring status – discarded/open/completed: (Time 2)

Comments on implementation status: (Time 2)

Final implementation monitoring status – discarded/open/completed: (Time 3)

Final comments on implementation status: (Time 3)

Recommendation #60
Effectiveness: Recommendation 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 Scheme²¹” as a complementary alternative to UN Clear Check 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.
- b. 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;
- c. 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.)
- d. 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 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

²¹ Please consult: <https://misconduct-disclosure-scheme.org>

<p>should develop a simple checklist to support an assessment of whether the TPC has appropriate standards and investigation capacity in place.</p>
<p>Responsible unit(s): Point a: n/a Point b: n/a Point c: PSEAH Point d: OIG</p>
<p>Management response Point a: <i>Not accept</i> Point b: <i>Not accept</i></p> <p><i>IOM doesn't have resources or capacity to enforce the clearance of TPC staff through ClearCheck nor enforce completion of training prior to onboarding but can more diligently track compliance once personnel are contracted. The TPC template already reflects the requirements stated. If necessary, a specific reference to PSEA can be added to the undertaking.</i></p> <p>Point c: Accept Point d: Partially accept</p> <p><i>OIG cannot ensure investigation standards of external entities. OIG's participation in procurement due diligence is limited to information sharing and strategizing assessments. TPC procurement should follow the guidance on the UN Partner Protocol, which has developed an inter-agency checklist for assessing TPC capacity overall.</i></p> <p>Key actions: Point a: n/a Point d: n/a Point c: PSEAH Unit will share the Together We Say No communication materials on PSEA with TPG, available in 22+ languages to support frontline workers with easy-to-understand PSEA messaging; PSEAH Unit to coordinate with COs to share the communication materials with partners, as required.</p> <p>Point d: OIG will develop a checklist to support the assessment of TPC standards and capacity for investigations. OIG will continue to provide guidance to TPCs on investigations standards and feedback on investigations conducted by the TPCs. OIG will develop investigation checklists or guidelines for TPCs and as permitted by OIG's available resources, take additional steps to develop TPC investigation capacity through information sharing.</p>
<p>Implementation monitoring status – discarded/open/completed: <i>(Time 2)</i></p> <p>Comments on implementation status: <i>(Time 2)</i></p>
<p>Final implementation monitoring status – discarded/open/completed: <i>(Time 3)</i></p> <p>Final comments on implementation status: <i>(Time 3)</i></p>

Recommendation #61 *(linked to recommendations #38, #53, #54)*
Effectiveness: Recommendation 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).

Responsible unit(s): PSEAH
Support from: PROC, RO/CO, and OPC

Management response – Accept

Key actions: Based on the new IN/288 on *Implementing Partners Handbook*, IOM will be strengthening its approach to PSEA through implementing partners, by ensuring that IOM Offices and operations adopt the UN Implementing Partner PSEA Capacity Assessment, as provided within IN/288; IOM has also recently joined the UNPP and will take concrete steps for planning, implementation and follow-up of the UNPP within IOM, as well as global rollout to ensure that the system is being used.

Implementation monitoring status – discarded/open/completed: *(Time 2)*

Comments on implementation status: *(Time 2)*

Final implementation monitoring status – discarded/open/completed: *(Time 3)*

Final comments on implementation status: *(Time 3)*

Recommendation #62
Effectiveness: Recommendation 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.

Responsible unit(s): DHR
Support from:

Management response – Not accept

There are no HR systems for the recruitment of volunteers in IOM - this contractual type does not exist - and for daily workers, IOM does not have the resources to do additional checking outside the standard policy.

Key actions:

Implementation monitoring status – discarded/open/completed: *(Time 2)*

Comments on implementation status: *(Time 2)*

Final implementation monitoring status – discarded/open/completed: *(Time 3)*

Final comments on implementation status: *(Time 3)*

List of Acronyms

AAP – Accountability to Affected Populations
CBCM – Community-based Complaint and Feedback Mechanism
CEB – Chief Executive Board
CFM – Complaint and Feedback Mechanisms
CO – Country Office
CoM/HoO – Chief of Mission / Head of Office
CP – Child Protection
DG – Director General
DDG-MR - Deputy Director General Management and Reform
DDG-O - Deputy Director General of Operations
DER – Department of External Relations
DFAM – Department of Financial and Administrative Management
DHR – Department of Human Resources
DHRM – Department of Human Resources Management (*used sometimes by the External Evaluators*)
DPDC – Department of Peace and Development Cooperation
DPSMM – Department of Programme Support and Migration Management
DSPOP – Department of Strategic Planning and Organizational Performance
DOE – Department of Operations and Emergencies
ECO – Ethics and Conducts Office (2021 acronym)
EO – Executive Office
ERM – Enterprise Risk Management Unit
GBV – Gender-Based Violence
GBViC – Gender-Based Violence in Crisis
GDU – Gender and Diversity Coordination Unit
GHAP – Global Health Assessment Programme
GSAC – Global Staff Association Committee
IASC – Inter-Agency Standing Committee
IGF – Internal Governance Framework Unit
IOM – International Organization for Migration
IP – Implementing Partner
JPO – Junior Professional Officer
LEG – Department of Legal Affairs
M&E – Monitoring and Evaluation
MCU – Media and Communication Unit
MHRO-REC – Manila Human Resources Office/Recruitment
MiRAC – Migration Resource Allocation Committee
MOU – Memorandum of Understanding
NSAC - National Staff Association Committee
OHU – Occupational Health Unit
OIG - Office of the Inspector General
OOM - Office of the Ombudsman and Mediation Services
OPC – Operational Compliance Unit
OSI – Operational Support Income
OSS – Office of Safety and Security
PRM – Population Refugees and Migration

PROC – Procurement
PSEA – Protection from Sexual Exploitation and Abuse
PSEAH - Protection from Sexual Exploitation and Abuse and Sexual Harassment
PXD – Protection Division
RBM – Results-based Management Unit
RC/HC - Resident Coordinator/Humanitarian Coordinator
RD – Regional Director
RO – Regional Office
RWFP – Respectful Workplace Focal Points
SH – Sexual Harassment
SOGIESC – Sexual Orientation, Gender Identity, Gender Expression and Sexual Characteristics
SOP – Standard Operating Procedures
SWO – Staff Welfare Office
TF – Taskforce
TPC – Third Party Contractor
TOR – Terms of Reference
UN – United Nations
UNFPA – United Nations Population Fund
UNICEF – United Nations Children’s Fund
UNPP – United Nations Partner Portal (UNPP)
USRAP – United States Refugee Assistance Programme
WAAI – We Are All In (IOM misconduct reporting platform)