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Prevention of Sexual Exploitation and Abuse

**Risk Management Tool**

Feb 2021

# Introduction

In line with UNDP’s [Enterprise Risk Management (ERM) policy](https://popp.undp.org/_layouts/15/WopiFrame.aspx?sourcedoc=/UNDP_POPP_DOCUMENT_LIBRARY/Public/AC_Accountability_Enterprise%20Risk%20Management%20Policy.pdf&action=default), where SEA is identified as a sub-risk category, this tool provides step-by-step guidance on how to identify and prevent SEA risks in the Country Office (CO).

The Toolkit was originally commissioned by the Conduct and Discipline Unit (CDU) of the United Nations (UN) Department of Field Support (DFS), and written by Anna Shotton, Director of PeacePlan Ltd (www.peace-plan.org). Further amendments to the text and layout of the Toolkit were made by CDU/DFS in June 2018 and then later by UNDP in 2021.

# What does the toolkit do?

The toolkit will help CO leadership answer the following questions:

1. What is the likelihood that UNDP personnel commit SEA in the CO environment? What impact would this have on the CO’s objectives? Which factors drive this risk?
2. How effective are internal controls in the CO in preventing UNDP personnel from committing SEA? What additional measures can the CO take to further reduce the risk of UNDP personnel committing SEA?
3. Are risks to the CO’s ability to receive allegations of SEA being identified, assessed and managed effectively?
4. Are risks to the CO’s ability to assist victims of SEA by UNDP personnel, being identified, assessed and managed effectively?
5. Are risks changing or remaining constant? Is it time to conduct a new risk analysis exercise?

# Who is the toolkit for?

In line with UNDP’s [Enterprise Risk Management policy](https://popp.undp.org/_layouts/15/WopiFrame.aspx?sourcedoc=/UNDP_POPP_DOCUMENT_LIBRARY/Public/AC_Accountability_Enterprise%20Risk%20Management%20Policy%20(2016).pdf&action=default), the Resident Representative/Head of

Office is ultimately responsible for risk management and accountable to the relevant Bureau Director for ensuring that the CO’s Risk Register is regularly monitored, updated, that risks are managed and that any risk that cannot be addressed at the CO level can be escalated to the relevant Bureau following ERM escalation process. With regards to undertaking the SEA risk assessment (which is one of the subcategory of risks identified in UNDP’s [ERM policy](https://popp.undp.org/_layouts/15/WopiFrame.aspx?sourcedoc=/UNDP_POPP_DOCUMENT_LIBRARY/Public/AC_Accountability_Enterprise%20Risk%20Management%20Policy%20(2016).pdf&action=default)), this Toolkit has been developed for PSEA Focal Points (where such role has been nominated) or other personnel delegated to undertake the SEA risk assessment. These people are referred to as “users” in the Toolkit.

# What is risk management?

As noted in the [Enterprise Risk Management policy](https://popp.undp.org/_layouts/15/WopiFrame.aspx?sourcedoc=/UNDP_POPP_DOCUMENT_LIBRARY/Public/AC_Accountability_Enterprise%20Risk%20Management%20Policy%20(2016).pdf&action=default), risk management consists of six key elements: establishing scope, context, criteria; risk assessment; risk treatment; monitoring and review; recording and reporting; and communication and consultation. In this Toolkit, the focus is on managing risks to the CO’s successful achievement of its objectives on SEA.

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| --- | --- |
| 1. **Communication and Consultation** 2. **Scope, Context and Criteria** 3. **Risk Assessment** 4. **Risk Treatment** 5. **Monitoring and Review** 6. **Recording and Reporting** |  |

# Communication and Consultation

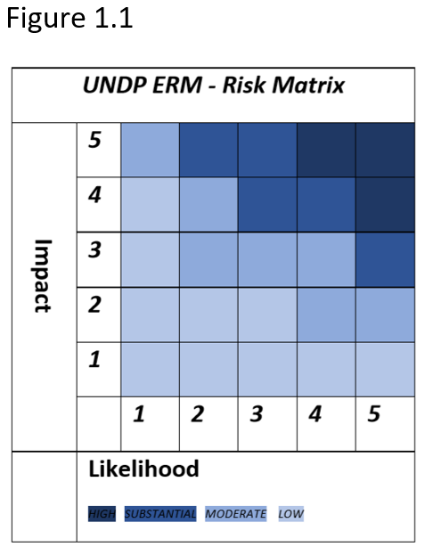
As general principle throughout the SEA risk management process, it is important to include relevant stakeholders, including programmatic and operational staff as well as other relevant stakeholders (e.g. in-country network on protection from sexual exploitation and abuse, UN system, national partners, experts, donors, target groups and beneficiaries). Communication and consultation should take place at regular/planned intervals to inform risk identification, assessment, treatment, monitoring, reporting and review.

# Scope, Context and Criteria

it is important to understand the external context and CO profile by undertaking a situation analysis. In doing so, the user can make use of **Tool 1. “Key Questions for SEA Situation Analysis”** which provides a list of key questions to guide the situation analysis and the identification of SEA risks and causes. The tool itself looks at the following areas: the external context, the country office profile including programme portfolio,the country office commitment to addressing SEA, knowledge and attitudes of UNDP personnel, access to the local population, the security situation, and living and employment conditions.

# Risk Assessment

Once there is an understanding of the external context, the user can start identifying, analyzing, and evaluating risks. To help with risk identification, see **Tool 2. “Examples of SEA Risks and Risk Factors”**, which contains a list of SEA-related risks and generic risk factors drawn from different COs and contexts. These examples are purely illustrative. Each context and CO will face its own unique risks.

Once the risks have been identified, the user need to assess the likelihood of such risks and the potential impact on the CO’s objectives. As noted in the [ERM policy](https://popp.undp.org/_layouts/15/WopiFrame.aspx?sourcedoc=/UNDP_POPP_DOCUMENT_LIBRARY/Public/AC_Accountability_Enterprise%20Risk%20Management%20Policy%20(2016).pdf&action=default), and as noted in figure 1.1 below, a five-point scale is used to determine likelihood and impact. Based on the likelihood and impact, the risk significance level (High, Substantial, Moderate or Low) is determined.

**HIGH level risks require escalation and thorough risk analysis**. Extra risk control mechanisms need to be put in place, and risk treatment measures clearly identified, budgeted, and implemented; and frequently monitored.

**Both SUBSTANTIAL and MODERATE level risks require risk analysis scaled to the scope and nature of the risks with risk treatment and monitoring measures in place and budgeted**. SUBSTANTIAL risks require more detailed risk analysis and risk management plans.

**LOW level risks do not require further analysis or treatment**.

As a final step in the risk assessment process, the user needs to determine which risks can be accepted and which risks require a priority response. Risks, such as SEA risks, which present significant harm to people and/or the organization should be avoided where possible and otherwise minimized and mitigated. The decision on which risks are a priority should be based partly on the risk significance level and partly on other factors. For instance, since all COs have the responsibility first and foremost to try to prevent acts of SEA, risks to this objective will need to be prioritized. Other issues to consider include how urgent it is to address the risk, whether one risk needs to be tackled before another can be addressed, and the extent to which the CO can influence the risk. In general, there is a tendency to underestimate risks. For this reason, it is better to apply a precautionary approach by estimating the risk higher rather than lower.

# Risk Treatment

For each High, Substantial or Moderate level risk, one or more risk treatment measures must be identified. **For examples of SEA Risk Treatments, see Tool 3.**

For each risk, the user must assign a Risk Owner and a treatment owner (see below), who is ultimately accountable for ensuring the risk is managed appropriately. For more information on this role and for information regarding risk escalation, see the [ERM Policy](https://popp.undp.org/_layouts/15/WopiFrame.aspx?sourcedoc=/UNDP_POPP_DOCUMENT_LIBRARY/Public/AC_Accountability_Enterprise%20Risk%20Management%20Policy%20(2016).pdf&action=default) for more details.

Risk information including Risks Treatments should be recorded in the Corporate Planning System (CPS)Risk Register for programme/unit level and in Atlas for project level risks.

# Monitoring and Review

As noted in the [ERM Policy](https://popp.undp.org/_layouts/15/WopiFrame.aspx?sourcedoc=/UNDP_POPP_DOCUMENT_LIBRARY/Public/AC_Accountability_Enterprise%20Risk%20Management%20Policy%20(2016).pdf&action=default), regular risk monitoring is required to inform management decisions, enabling adaptive management and course corrections. When monitoring the risks, the User may want to ask questions such as:

* Are the risks still relevant? Should any new risks be added?
* Is the list of priority risks still accurate? Have new priority risks emerged? Should any risk be downgraded and no longer be considered a priority?
* Are the scores for the risks still accurate?
* Do any severe/high risks need to be escalated to CO leadership to address?
* What is the trend for each risk? Is the risk remaining constant, increasing or decreasing?
* What is the status of implementation of risk responses? Are they on schedule? Can any risk responses be marked as “completed”?

# Recording and Reporting

As noted in the [ERM Policy](https://popp.undp.org/_layouts/15/WopiFrame.aspx?sourcedoc=/UNDP_POPP_DOCUMENT_LIBRARY/Public/AC_Accountability_Enterprise%20Risk%20Management%20Policy%20(2016).pdf&action=default), risk reporting ensures that relevant risk information is available across all levels of the organization in a timely manner to provide the necessary basis for risk-informed decision making. At the programme/unit level, an annual report through the ROAR and semi-annual report through IWP Risk Register is required. The second semi-annual report is replaced by an annual report. The IWP Risk Register is informed by project-level Risk Registers and an analysis of cross-cutting programmatic, institutional and contextual risks. The IWP Risk Register is reviewed regularly by the Programme Manager to inform decision-making. Please note that risk management must be reflected in mid-term and final evaluations. Programme Managers should also review and monitor projects’ risks and reflect and incorporate relevant risks in the IWP risk register.

**Tool 1: Key Questions for SEA Situation Analysis**

This tool contains a list of key questions to guide situation analysis and identify SEA-related risks and causes.

**External Context**

* Does the country context present opportunities for UNDP personnel to commit SEA? (e.g. the existence of a legal and/or open commercial sex industry; high proportion of the population living in poverty or unemployed; cultural tolerance of exchange of money or gifts for sex between consenting adults; cultural practice of early child marriage; a weak rule of law system that is unlikely to be able to hold UNDP personnel to account for criminal acts)
* How do the opportunities for UNDP personnel to commit SEA differ in the capital compared to field locations? Are there significant regional differences in the context?
* What opportunities exist for UNDP personnel to commit SEA in rest and recuperation (R&R) locations? How easily can acts of SEA be detected in R&R locations?
* Who in the population is most vulnerable to SEA by UNDP personnel? (e.g. domestic workers, teenage school girls, street children, migrant workers in bars and restaurants, populations fleeing conflict who settle around UNDP bases in search of protection, internally displaced persons (IDPs) living in camps protected by UN peacekeepers)
* What does trend analysis of past UNDP or UN data on victims reveal about who is most vulnerable to SEA by UNDP personnel?
* Are UNDP personnel being approached by the local population and solicited for sex? (e.g. UN personnel are targeted by commercial sex workers in hotel bars or clubs)
* How likely are victims and the general population to report SEA allegations? (e.g. cultural tolerance of exchange of sex for money or gift between consenting adults may discourage reporting of SEA; socially-conservative attitudes about extra-marital sex may discourage reporting of SEA; countries where homosexuality is illegal would discourage reporting of SEA involving boys/men)

**Country Office Profile**

* Does the CO design and implement projects directly (or via implementing partners)? If so, does the implementation of the projects require extensive contact with populations that are vulnerable to SEA by UNDP personnel? Which categories of personnel are most in contact with such vulnerable populations?
* Does project implementation involve deployments to remote locations where there is limited external oversight of UNDP personnel?
* Is it a family or non-family duty station? How does this affect the organizational culture of the CO?
* What is the gender balance among UNDP personnel? How does this affect the organizational culture of the CO?
* Do specific categories of personnel have a culture of excessive drinking and/or risk taking (which have been associated factors in some past cases of SEA)?
* What does trend analysis of past UNDP data on SEA allegations and cases reveal about which UNDP personnel are more likely to commit SEA in the future and under what circumstances? (i.e. data on what has happened in the past can give a good indication of what is likely to happen in the future)

**Country Office commitment to addressing SEA**

* What is the tone at the top among CO leadership about the importance of addressing SEA?
* To what extent do CO leadership and managers lead by example and demonstrate through their personal behaviour and through their actions in the workplace a commitment to addressing SEA?

**Knowledge and attitudes of UNDP personnel**

* To what extent do UNDP personnel know what are the UNDP standards of conduct on SEA? (e.g. whether personnel undertook the mandatory online training course on SEA)
* To what extent do UNDP personnel accept the UNDP standards of conduct on SEA? (e.g. are the standards perceived as an unacceptable intrusion into their private lives)
* To what extent do UNDP personnel hold attitudes that tolerate or condone certain forms of SEA? (e.g. sex with commercial sex workers or early child marriage)

**Access to the local population**

* Do the living arrangements of UNDP personnel and/or the location of the office present opportunities for UNDP personnel to commit SEA? (e.g. lax hotel policies on overnight guests, the hiring of domestic workers by civilians, and the proximity of the office to residential areas, schools or market stalls could all present opportunities for SEA)

**Security situation**

* To what extent does the security situation affect the ability of UNDP personnel to move around and have contact with the population?
* Are there lists of out-of-bounds locations? Are there adequate resources to patrol these locations? (e.g. by UN military police) How easily can off-duty UNDP personnel be distinguished from the population?
* Do CO-specific or UN mission policies/procedures exist that restrict UNDP personnel movements and/or off-duty contact with the population? (e.g. curfews, security restrictions, non-fraternisation policies for uniformed personnel)

**Living and deployment conditions**

* Is welfare provision for UNDP personnel adequate?
* Are any international personnel being deployed without leave or R&R breaks for more than twelve months?
* Do specific categories of personnel stay in the country location for their R&R breaks to save money?
* Is it common practice for specific categories of personnel to avoid taking annual leave or R&R due to the high tempo of work/operations?
* Are the living conditions for personnel adequate?

**Tool 2: Examples of SEA Risks and Causes**

As noted in [Enterprise Risk Management policy](https://popp.undp.org/_layouts/15/WopiFrame.aspx?sourcedoc=/UNDP_POPP_DOCUMENT_LIBRARY/Public/AC_Accountability_Enterprise%20Risk%20Management%20Policy%20(2016).pdf&action=default), SEA is identified as a sub-risk category under the “Social and Environmental” category. As such, it is important to note that each CO is expected to assess and identify at least one SEA risk in the IWP risk register as part of the Annual Work Plan exercise as well as Project cycle where applicable. As part of the register, information around the event, cause and impact will have to be provided (see below screenshot). To help in this process, below are some examples of SEA risks and risk factors.

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| **No.** | **Examples of risk descriptions** | **Examples of risk factors** | **Impact** |
| **Examples of risks related to the objective of preventing SEA** | | | |
| 1. | UNDP personnel sexually exploit or abuse adult domestic workers in their private accommodation | * Vulnerability of domestic workers to SEA due to high levels of poverty and unemployment * Difficulty to detect SEA taking place in private accommodation of UNDP personnel creates a sense of impunity * Low awareness of UNDP standards of conduct on SEA among domestic workers * Cultural attitudes of UNDP personnel that tolerate or condone sexual exploitation of domestic workers | * Victim exploited and abuses (physical, mental and emotional impact on the victim) * Reputational damage * Lack of donor support * Lack of support from Host Government |
| 2. | UNDP personnel have transactional sex with adults from the population | * High prevalence of brothels in areas close to UNDP offices or residential areas * Cultural attitudes of the population that tolerate or condone transactional sex * Low awareness among UNDP personnel standards of conduct on SEA * Cultural attitudes of UNDP personnel that tolerate or condone transactional sex * Poor welfare and recreation provision for UNDP personnel * Poor living conditions in UN compounds * UNDP personnel are deployed without rest and recuperation (R&R) breaks for more than 12 months | * As above |
| 3. | UNDP personnel on mission to the CO have transactional sex with adults from the population | * Cultural attitudes of UNDP personnel that tolerate or condone transactional sex between consenting adults * Difficulty to detect SEA taking place in private accommodation of UNDP personnel creates a sense of impunity * Excessive drinking and loss of good judgement, linked to high levels of stress * Soliciting of UNDP personnel in hotels and bars by members of the population, including commercial sex workers | * As above |
| 4. | UN civilian, police or military personnel commit SEA with a child2 (i.e. a person under the age of 18) | * Cultural attitudes of UNDP personnel that tolerate or condone sex with teenagers, including younger teenagers * Cultural attitudes of UNDP personnel that tolerate or condone early child marriage * Cultural attitudes of the population that tolerate or condone exchange of money or gifts for sex * High numbers of out-of-school children * High numbers of vulnerable street children around UNDP offices or UN accommodation | * As above |
| 5. | UN national staff and national contractors commit SEA with the population | * Cultural attitudes that tolerate or condone sexual relationships with persons under the age of 18 * Low awareness of UNDP standards of conduct among national contractor staff (e.g. regarding exchange of sex for employment) * Weak and corrupt rule of law system that creates a sense of impunity among national staff and contractors | * As above |
| 6. | UNDP personnel store or share on-line indecent images, video and/or other information of SEA victims | * UN personnel use private internet providers and personal electronic devices, which makes detection difficult and therefore creates a sense of impunity * Weak rule of law institutions in host country, which creates a sense of impunity | * As above |
| **Examples of risks related to the objective of enforcing UN/UNDP standards of conduct on SEA when it occurs** | | |  |
| 7. | Victims and other members of the population do not report SEA by UNDP personnel, which results in UNDP being unable to investigate the allegation and provide assistance to victims | * Cultural attitudes that condone or tolerate certain forms of SEA such as exchange of gifts or money for sex * The victim fears physical violence, being socially ostracized or other negative consequences due to social taboos * Surrounding victims of sexual violence or socially-conservative attitudes about extramarital sex * The victim fears legal prosecution if he/she reports SEA (e.g. prosecution for adultery or homosexual acts) * When the victim or his/her relatives are financially dependent on UNDP personnel committing SEA, they fear loss of income if they report SEA * Victims/the population are unwilling to report SEA when they find out that UNDP does not provide financial compensation in SEA cases * Fear of retaliation by perpetrator/others * Lack of trust in UNDP complaints mechanisms (e.g. fear that confidentiality will not be maintained, doubts that UNDP will take action on the reported allegation) | * Exploitation and Abuse continues * Reputational damage * Lack of trust among population |
| 8. | UNDP personnel do not report SEA, which results in UNDP being unable to investigate the allegation and provide assistance to victims | * Fear of retaliation by perpetrator/others * Cultural attitudes that condone or tolerate certain forms of SEA such as transactional sex between consenting adults * Low awareness of UNDP standards of conduct on SEA * Lack of trust in UNDP’s complaints mechanisms (e.g. fear that confidentiality will not be maintained) * Perception that inadequate action will be taken to investigate and sanction perpetrators | * As above |
| 9. | False allegations of SEA are made by the population, which results in investigations resources being wasted and delays genuine allegations being investigated | * Individuals make false allegations in the hope of making a financial gain * Individuals or small businesses in remote areas fear loss of revenue from sale of food and other goods to UNDP personnel after UNDP personnel depart, resulting in the population making false allegations to keep UNDP investigators in the area for longer. | * Resources wasted |
| **Examples of risks related to the objective to assist victims of SEA by UNDP personnel** | | |  |
| 10. | There are no medical or other services in the vicinity of where victims live, or these services are of poor quality, resulting in victims receiving no or inadequate immediate assistance, or delayed assistance | * Scarce health and psycho-social service provision by the host government and others in remote areas * Poor quality health and other service provision by the host government and others in remote areas * Insecurity constrains travel by victims to nearby health or other facilities * Poor road infrastructure makes travel by victims to nearby health or other facilities difficult (e.g. during rainy season) | * Victim suffers * Reputational damage * Lack of donor support |
| 11. | Victims receive no information or inadequate information from Member States on action taken in substantiated SEA cases | * Member States provide no information or inadequate information on action taken in substantiated cases * Lack of dedicated focal point in the CO to liaise with victims | * Lack of trust among population * Less reports due to lack of trust |

**Tool 3. Examples of SEA risk Responses**

As part of the IWP risk register, there is a need to identify treatments (including specific activities, time frame, expected effect and who is responsible) for each identified risk (see screenshot below). To help identify these treatments, below is a list of suggested activities in each area.



Awareness-raising and training

1. Measures to increase knowledge of UNDP personnel on UNDP standards of conduct on SEA and how to report SEA (e.g. mandatory SEA online training, through induction and refresher training; internal communications activities; requirement for experts on mission to sign a confirmation letter acknowledging that they understand the UNDP standards of conduct and will fulfill their responsibilities in this regard).
2. Measures to create an organizational culture that is respectful of both women and men (e.g. provision of gender awareness training, messaging from CO leadership, regular dialogue between CO leadership and female staff deployed to remote locations with poor gender balance).

Human resources

1. Measures to improve gender balance among personnel at all levels
2. Conduct thorough background check for new employees

Accountability, structures and policies

1. A clear tone at the top underlining the importance of addressing SEA and the importance of UNDP core values (e.g. issuance of a Resident Representative vision statement on SEA; inclusion of SEA as an agenda topic in management meetings).
2. Dedicated structures and resources to address SEA (e.g. SEA Focal Points, Standing SEA Task Force, networks of SEA focal points).
3. Inclusion of language on addressing SEA in senior management performance appraisals.
4. Where applicable and in collaboration with the UN country team and UN missions, policies and procedures that restrict UN personnel movements and off-duty contact with the local population (e.g. curfews, lists of out-of-bounds areas where prostitution is known or suspected to occur, policy on wearing UNDP identifiable clothing at all times while working with the affected population, policy prohibiting certain categories of contractor personnel (e.g. cleaners) being in UNDP/UN compounds after working hours or at weekends).
5. Measures to restrict access of the population to UN accommodation/camps of civilian and uniformed personnel (e.g. restrict the timings when cleaners can be in UN camps to minimize contact with UN staff, liaise with the local authorities to prevent new businesses/dwellings from being erected adjacent to UN contingent camps).
6. Monitoring and oversight of high-risk locations for SEA (e.g. SEA risk assessment visits, deployment of SEA Focal Point to high risk areas, regular visits by senior management to high-risk locations).

Safety and security

1. Strengthening entry/exit controls into UNDP offices/accommodations.

Welfare and living conditions

1. Provision of adequate welfare facilities (e.g. internet, phone/skype, gym, outdoor sports, indoor games, inter-agency sporting competitions, food deliveries to remote locations) and adequate living conditions for all personnel.
2. Provision of counselling services for personnel.
3. Channeling personal, charitable donations from UNDP personnel (e.g. food and non-food items) through third party organisations such as non-governmental (NGOs).

Complaints mechanism and response

1. Establishment of complaints mechanisms for UNDP personnel and for the population to increase reporting of SEA (e.g. toll-free telephone hotline, complaint boxes in offices and outside project sites, community-based complaint mechanisms).
2. External communications on the status and outcome of SEA investigations.

Victim Assistance

1. External communications activities targeting the population on risk factors for SEA, UNDP standards of conduct on SEA, reporting mechanisms for the population, and assistance available to victims. This should be done in coordination with other UN agencies and missions, local authorities and civil society (e.g. traditional leaders, youth and women groups). Examples of communications activities include radio programmes, community theatre and dance, distribution of t-shirts/umbrellas/hats with SEA messaging, pocket cards in local languages on how to report SEA).
2. Establishment of referral mechanisms for victims of SEA so that victims are provided with immediate support (e.g. psycho-social assistance, shelter, security/protection) and longer-term support (e.g. skills training, support to return to full-time education).
3. Establishment of victim rights advocates in COs to maintain contact with victims and assist them to gain access to judicial redress and get feedback on the status of their cases.