

# Protection from sexualized violence and exploitation in international development and humanitarian aid

2019



Practical Handbook

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## Foreword

Sexualized violence is an issue of great concern for all of us. The injuries caused by this kind of violence are not only physical, but also psychological. Often these traumas will affect victims/survivors for the rest of their lives.

Every organization is obliged to protect its employees, partners, volunteers, supporters and beneficiaries from sexualized violence and exploitation. Organizations engaged with improving the safety and dignity of people in difficult circumstances and who fight for global justice have a special responsibility to live up to their own standards.

The member organizations of VENRO have therefore committed themselves to creating a working environment in which abuse of entrusted power is effectively prevented and to taking appropriate measures to protect against sexualized violence and exploitation. The *VENRO Code of Conduct on Transparency, Organizational Management and Monitoring* requires all member organizations to introduce and implement regulations to protect against sexualized violence and exploitation.

In order to appropriately fulfil these obligations, organizational structures and processes must be reviewed. Prevention plays an important role. However, taking preventive action is not only limited to imparting knowledge about sexualized violence. A living culture of mindfulness and considerate interactions with one another form a basis for effective prevention. At the same time, effective complaints mechanisms must be established so that violations can be identified and appropriately dealt with. Those affected must be supported and misconduct must be punished.

Though sexualized violence and exploitation can unfortunately never be completely eliminated, we must do everything we can to minimize the risks and create an organizational culture where there is no place for sexualized violence.

I hope that this manual, aimed at employees and managers alike, will help us live up to our responsibility towards those with whom and for whom we work.

*Heike Spielmans*  
*Managing Director*

## 1. Introduction



People around the world have demonstrated against sexualized violence and exploitation.  
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ment, e.g. in the form of unwanted sexual advances or as a request for sexual favours. Any verbal or physical act of a sexual nature that can rightly be considered offensive or humiliating by the victim is sexualized violence.

In Germany, the Criminal Code (Strafgesetzbuch, StGB) regulates when sexualized violence is considered a crime. Articles 174 to 184g of the Criminal Code specify the offences against sexual autonomy. These include, among others, sexual abuse, sexual coercion and rape.

A central aspect of sexualized violence<sup>1</sup> and exploitation is that perpetrators<sup>2</sup> exploit their position of power and authority. This means that they abuse a person's vulnerable situation (e.g. a person who depends on another person to survive or to obtain food, schoolbooks, transport or other services) or exploit a relationship of power or trust.

The causes of sexualized violence also lie in socially assigned roles (including gender roles), unequal power relations (especially among those of different genders) and social discrimination against girls and women. Sexualized violence and exploitation are also forms of gender-based violence.<sup>3</sup>

However, there are many factors that lead to sexualized violence and exploitation. Figure 1 shows some of them.

Sexualized violence and exploitation occur in many forms. They begin with the violation of personal boundaries, or manners which lead to such violations. These include unwanted comments or insinuating talk about physical characteristics and appearance. These also include sexual harass-

### Some explanations of concepts and forms of sexualized violence and exploitation:

- [PSEA Implementation Quick Reference Handbook](#) (CHS Alliance, 2017),
- [Glossary on Sexual Exploitation and Abuse](#) (United Nations, 2016),
- [Guidelines for Integrating Gender-Based Violence Interventions in Humanitarian Action](#) (Inter-Agency Standing Committee, 2015)
- [Terminology Guidelines for the Protection of Children from Sexual Exploitation and Sexual Abuse of the Interagency Working Group on Sexual Exploitation of Children](#) (known as the [Luxembourg Guidelines](#)).

1 The use of the term 'sexualized violence' instead of 'sexual violence' is to clarify that sexual acts against the will of a person are used for the exercise of power, control and oppression.

2 According to studies, the perpetrators are in about 80 to 90 percent of the cases adult or adolescent males, and about 10 to 20 percent of the cases adult or adolescent females.

3 <https://www.medicamondiale.org/nc/nachrichten/10-gruende-warum-sexualisierte-gewalt-kein-zufall-ist.html>



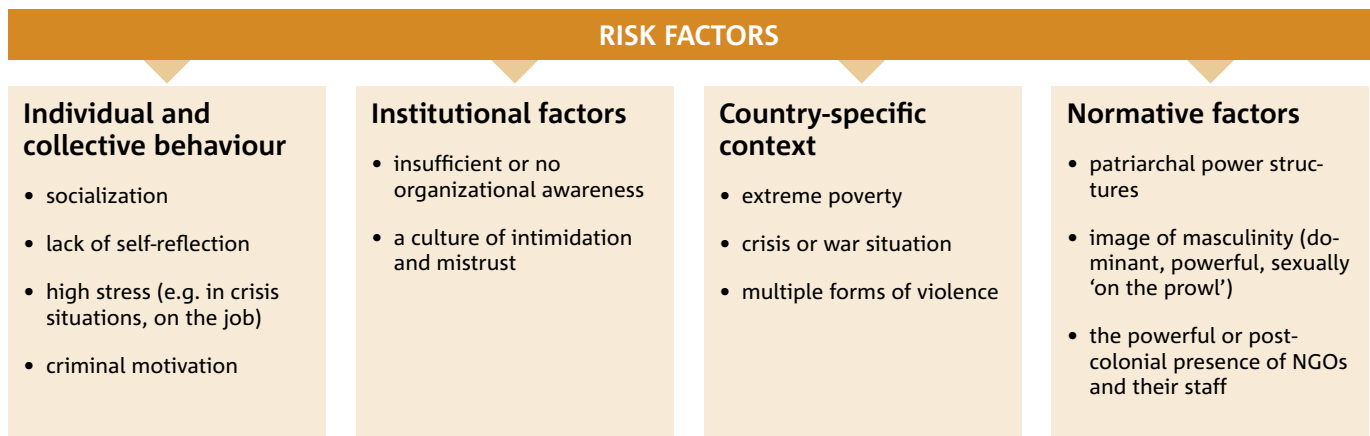


Figure 1: Factors which facilitate sexualized violence and exploitation (Marie-Carin von Gumpfenberg, VENRO training, 2018)

## Who is affected by sexualized violence and exploitation?

People of all ages and genders can become victims of sexualized violence. People particularly at risk include women, children, young people and other especially vulnerable groups, such as people with disabilities.

Those who have survived sexualized violence are victims of a crime. The term victim refers to the harm done to a person and society's obligation to prosecute the perpetrator(s). As a (self-)designation, 'victim' makes it clear to those affected that they are innocent and that they have been harmed. However, it is sometimes problematic for those affected by sexualized violence. This is primarily due to the social stigmatization surrounding the term 'victim'. Since the term is equated with powerlessness, helplessness, and weakness, there is a risk that those affected will be defined by these attributes. Non-affected persons and even affected persons themselves often overlook the fact that people who have survived sexualized violence have, on the contrary, shown special strengths. Lastly, but importantly, for those given 'victim status', there is also a risk that others will again seek to abuse them, make decisions for them or violate their boundaries.

Therefore, some of those affected by sexualized violence prefer to be called victims (of sexualized violence), while others prefer survivors (of sexualized violence), which can also change depending on context.<sup>4</sup>

## What does safeguarding mean?

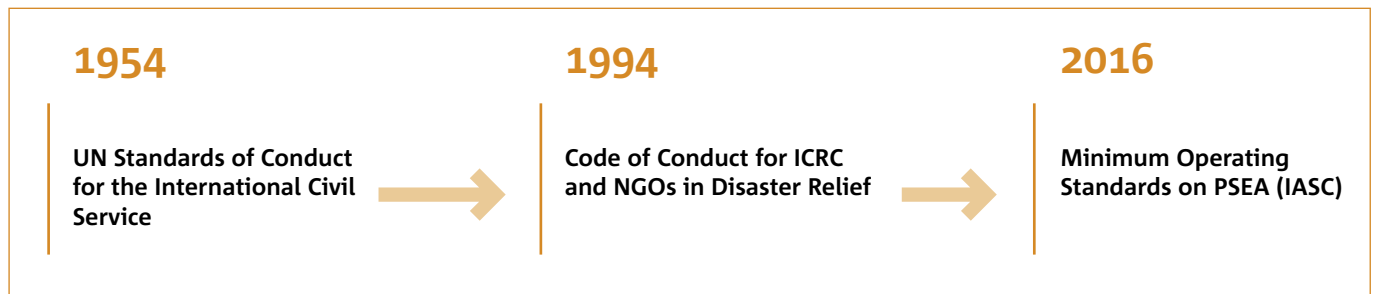
Safeguarding is a broad concept. It includes protection from sexualized violence and exploitation<sup>5</sup> as well as child protection. Safeguarding stands for the responsibility of organizations to ensure that their employees, programmes and projects do not harm children and vulnerable adults, or expose them to the risk of harm or abuse. Current discussions show that good practices include extending safeguarding to people within the organization, considering the protection of staff as well.



Safeguarding Session at the Bond Conference 2018, © VENRO/Lukas Goltermann

<sup>4</sup> Further information can be found here: <https://netzwerkb.de/>.

<sup>5</sup> Protection from Sexual Exploitation and Abuse (PSEA) is also sometimes used.



**Figure 2:** Development of international standards related to the prevention of sexualized violence and exploitation (Marie-Carin von Gumpenberg, VENRO training, 2018)

Even though issues of child protection and protection from sexualized violence and exploitation are intertwined in practice, this handbook is focused on the prevention of and response to sexualized violence. On the subject of child protection, VENRO has also adopted a binding → [Code of Conduct on Children's Rights](#) for its member organizations. The child protection page → <http://kindesschutz.venro.org/> and various other publications are referred to throughout this handbook <sup>6</sup>.

### International standards and guidelines

The standards for protection against sexual exploitation and abuse (PSEA) have evolved over time (see Figure 2). In 1954, the first standards of conduct for UN personnel were introduced, and further standards have followed over the years. Since the mid-2000s, more organizations have introduced reporting systems, trained their staff and partners and provided support for those affected by sexualized violence. The most widespread standards in international development and humanitarian aid today are the → [Minimum Operating Standards - Protection from Sexual Exploitation and Abuse by own Personnel \(MOS-PSEA\)](#), published in 2016 by the Inter-Agency Standing Committee (IASC) of the United Nations.

In Germany, VENRO has established standards: the → [VENRO Code of Conduct](#) and → [VENRO Code of Conduct on Children's Rights](#) (in German).

#### Further literature:

- [Guide: Guidelines to implement the Minimum Operating Standards for Protection from Sexual Exploitation and Abuse by UN and non-UN Personnel \(IASC Task Force on PSEA\)](#)
- [Practical Handbook of the CHS Alliance: PSEA Implementation Quick Reference Handbook \(CHS Alliance\) 2017](#)

### Relevant subject areas for safeguarding in an organization

Protection from sexualized violence and exploitation includes various measures and involves the entire organization. Safeguarding is all the more effective when strong pre-emptive measures for *prevention* and measures for *detection* and *response* are implemented together. These individual focuses are systematically related (see Figure 3).

In this handbook we draw attention to four relevant topics in connection to safeguarding:

- First, the question arises as to what *risks of sexualized violence and exploitation* exist in the organization, in its programmes and projects and in work with partner organizations. How can these risks be analyzed? What measures should be taken? How can partners be brought on board?
- A central starting point for protection from sexualized violence are those who hold responsibility within an organization, who implement programmes and projects and who, as target group, interact with the organization. A further component of safeguarding is therefore the selection of personnel and personnel management. How can protection against sexualized violence be integrated into the *selection of personnel* and personnel development, and ultimately be made part of overall organizational culture?
- *Awareness-raising and training* are a further decisive element. How can awareness be raised among employees and target groups? What formats and contents are suitable?
- Finally, in addition to preventive measures, the question arises as to what effective *whistleblowing and case management systems* should look like in order to receive complaints and pursue them confidentially. Particular attention will be paid to how to protect and support victims and survivors.

This handbook provides information on these topics, supplemented by current good practices. The contents are based on VENRO training courses and accompanying documentation.

For their expertise and their support in the preparation of this handbook, we would therefore like to thank the trainers Luise Ammerschuber and Dr. Marie-Carin von Gumpenberg.

We would also like to thank the member organizations who provided examples from their work.

## 2. Risks of sexualized violence and how to deal with them in the organization and in partner organizations

### 2.1 Risk analysis as a starting point

The starting point for all safeguarding measures is risk analysis, in which as many of the organization's stakeholders as possible should participate. The results of this analysis form the basis for all further measures in the three areas of *prevention*, *detection* and *response*. These can be introduced or developed in parallel or one after the other. Essentially, safeguarding is an ongoing process, by which these three areas' content are interconnected and which is informed by the organization's experience. It is helpful if as many employees as possible are involved in the process and are familiar with the organization's approach to protection.

When risk analysis is repeated at regular intervals, processes and responsibilities can then be adapted, further training developed, monitoring improved and case management adjusted as needed. In particular, the change of frameworks or fields of work, the addition of new projects and partners or lessons learnt from the implementation of safeguarding measures are good reasons for renewed risk analysis.

Risk analysis includes the identification, analysis and assessment of risks.

Another important component of risk analysis is to identify measures that the organization has already taken to effectively counter sexualized violence. Sometimes these measures are already part of existing planning and implementation routines.

### 2.2 Undertaking a risk analysis

Many organizations already carry out risk analyses during project work (for example with regard to security or financial risks). Here existing systems and processes can be adapted to include risks related to safeguarding. Risk analysis for safeguarding, however, looks beyond project and programme work to all areas of the organization.

Participatory processes involving key stakeholders (management, employees, partners, beneficiaries) can facilitate the identification, analysis and assessment of risks. This promotes a common understanding of the topic of safeguarding from the outset and helps develop solutions and measures for risk reduction together.

For risk analysis, risks within individual departments of the organization and individual projects are listed and

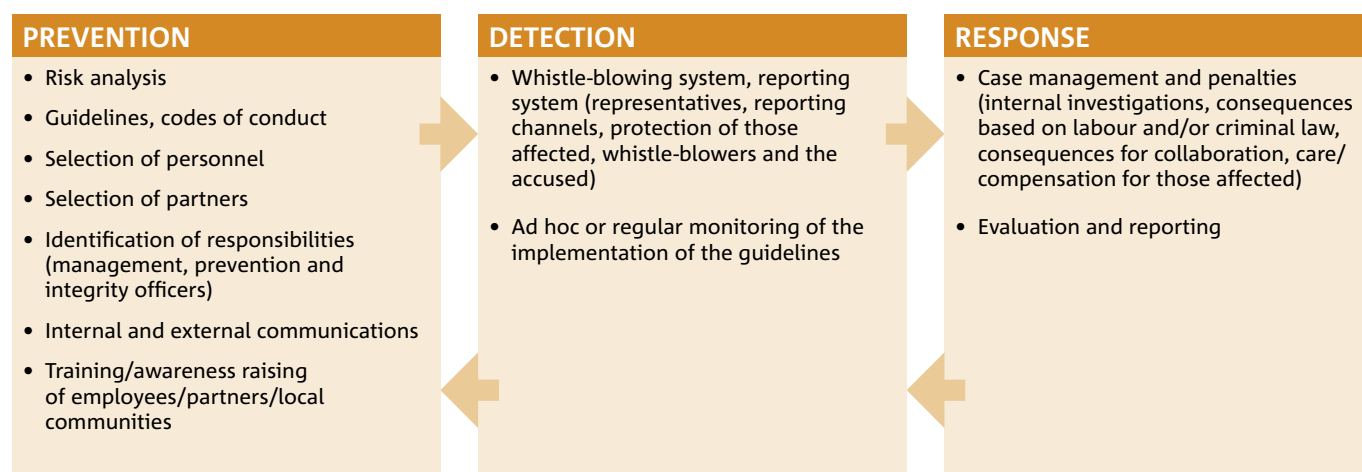


Figure 3: Measures of effective safeguarding (Marie-Carin von Gumpenberg, VENRO training, 2018)

## WHAT DOES THE VENRO CODE OF CONDUCT SAY?

VENRO members are to take appropriate measures to protect their employees, partners, volunteers, supporters and the beneficiaries of their programmes from sexualized violence. To this end, they make reasonable risk assessments, developing appropriate standards and ensuring their implementation. They inform their employees, beneficiaries, volunteers, relevant service providers, visitors (such as journalists) and their partner organizations about professional and ethical standards and procedures.

evaluated. The risks are assessed with regard to their probability of occurrence and with regard to their implications for

the affected parties and the organization. This can be done qualitatively or quantitatively via risk rating.

The next step is to list key points for each risk, stating what the organization is already actively doing to counter the previously identified risks and which measures remain to be introduced. Table 1 shows some fictional examples of risks of sexualized violence and exploitation in project contexts and possible measures to counter these risks.

### Instructions for carrying out risk analyses:

→ [UN Sexual Exploitation and Abuse Risk Management Toolkit](#)

→ [Oxfam Australia Child Safeguarding Toolkit](#), with a detailed chapter on risk management

Risks	Scope assessment	Measures already taken	Planned or necessary measures
A volunteer abroad fails to maintain appropriate professional distance and begins a relationship with someone subject to protection.		<ul style="list-style-type: none"> <li>A code of conduct and guidelines for employees of the organization.</li> </ul>	<ul style="list-style-type: none"> <li>Require volunteers to sign the code of conduct as well</li> <li>Integrate sexualized violence into volunteer training</li> <li>Clearly explain the consequences of such a relationship</li> </ul>
On a study trip to a project country, external speakers harass participants during the informal period of the evening events.		<ul style="list-style-type: none"> <li>Codes of conduct and guidelines are also signed by external service providers.</li> </ul>	<ul style="list-style-type: none"> <li>Any conspicuous behaviour by service providers is documented internally and these individuals will be excluded from future projects.</li> </ul>
Employees of the organization sexually exploit underaged girls for prostitution during work trips abroad.		<ul style="list-style-type: none"> <li>A code of conduct and corresponding guidelines are being implemented.</li> </ul>	<ul style="list-style-type: none"> <li>The topic of sexualized violence and exploitation is included in pre-trip briefings.</li> <li>The guidelines will be adapted so that, for example, engaging sex workers on work trips is entirely prohibited, even outside of working hours.</li> </ul>
Health personnel harass patients during the examination.		<ul style="list-style-type: none"> <li>A code of conduct and guidelines.</li> <li>Staff are regularly trained.</li> </ul>	<ul style="list-style-type: none"> <li>At least two employees or a representative of the patient must be present.</li> </ul>
Local leaders (e.g. directors of schools or protection centres) use their positions of power to sexually exploit.		<ul style="list-style-type: none"> <li>A code of conduct and guidelines.</li> <li>Whistle-blower system available</li> </ul>	<ul style="list-style-type: none"> <li>Inform beneficiaries and strengthening their rights, e.g. through training/education</li> <li>Raising awareness of partners and experts of the topic of sexualized violence and working together towards a better organizational culture</li> <li>Testing the whistle-blower system: Is it being used? Are people aware of it?</li> <li>Strive towards as much gender parity in management positions as possible</li> </ul>

**Table 1:** Examples of risks of sexualized violence in different project contexts



### Different risks in different sections of the organization

It is also recommended to examine the organization's different working areas and project types, as each has its own specific risks. Risk analysis must be more in-depth if high risk is identified overall for a particular area or project. Does the project, for example, deal with the distribution of food in emergency areas or the construction of kindergartens? Are water pipes being installed or tents being distributed to people under protection? Risks can vary greatly from one area to another. If, for example, there is direct contact with vulnerable people and marked power disparities, the risk of sexualized violence is higher.

Sector	Risk
Food distribution	high
Education	medium

Table 2: Example of risk assessment in different sectors



Risks are greater if there is direct contact with vulnerable target groups.  
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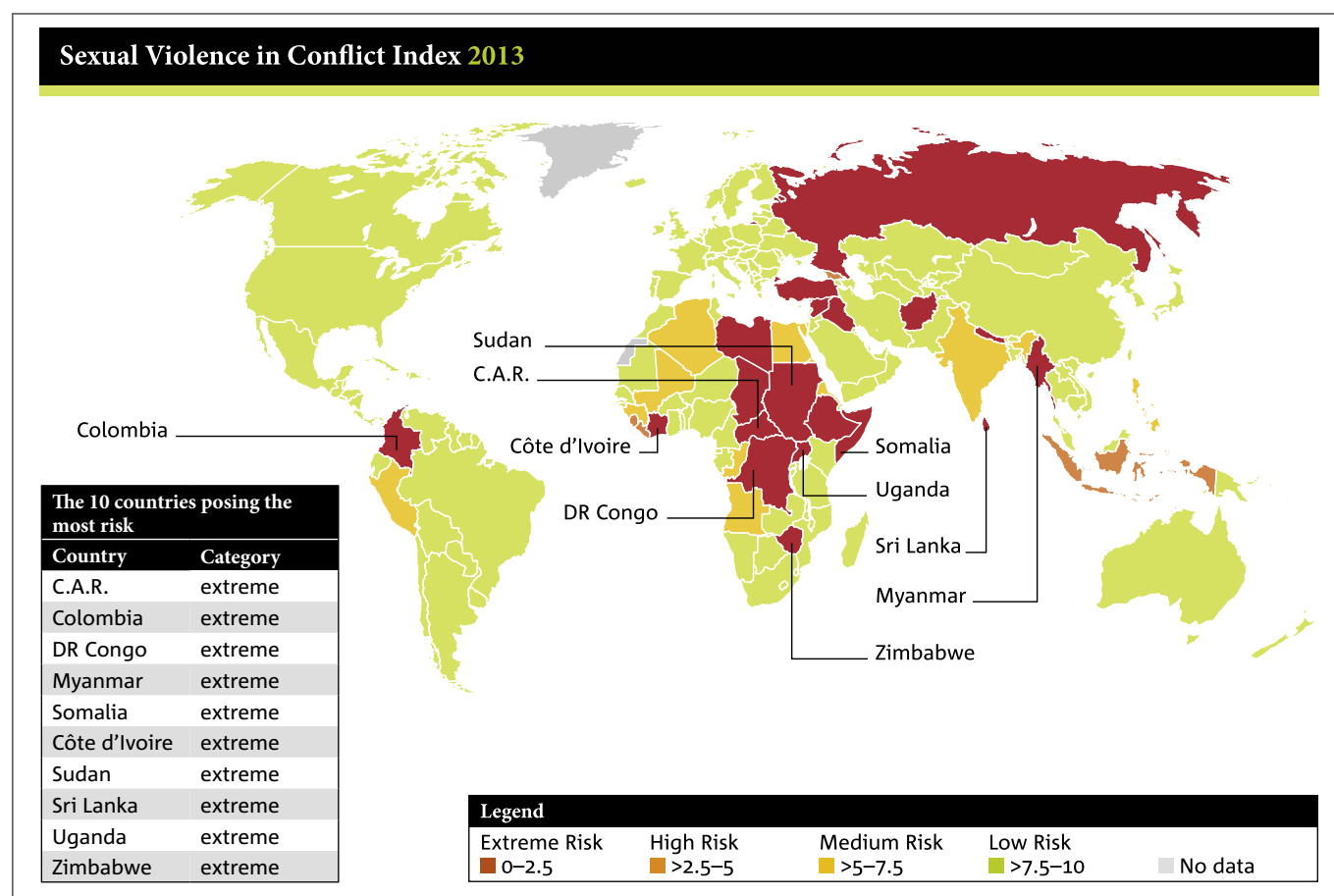


Figure 4: Sexual Violence in Conflict Index (Maplecroft 2013 7)

## Different risks in different regions and contexts

After general stocktaking, an additional assessment of specific risks in the countries where the organization operates may be useful, depending on the organization's focus (see Figure 4). The risk of sexualized violence and exploitation is especially greater in crisis and conflict situations. Refugees, for example, are exposed to greater risks and call for special protective measures.

## How can the risks be countered?

Once the organization, together with partners and beneficiaries, has identified, analysed and assessed risks, it should select a risk management strategy for each risk, taking into account the assessment. In general there are the following possible strategies: avoiding risks (e.g. ending a project or partnership), minimizing risks through preventive and reactive measures (e.g. implementing the four-eyes principle), recognizing and transferring risks, i.e. protecting against risks (e.g. clearly assigning responsibility to partners) or

consciously accepting the risks. Preventive measures reduce the probability of the risk occurring, and reactive measures reduce their negative consequences.

Not every strategy is suitable for every risk. Risks of sexualized violence and exploitation should be avoided as far as possible and minimized by preventive and reactive measures. In doing so, the focus should be on the (potential) victims and survivors. Sexualized violence and exploitation must be effectively prevented through preventive measures such as training. At the same time, it is unfortunately not possible to prevent all instances of sexualized violence and exploitation, at least in the medium-term, so those affected must receive protection and support, and cases must be pursued consistently. Various measures are explained in more detail in the following chapters of this handbook.

The → [Preventing Sexual Exploitation and Abuse. UN Agency and Cluster/Sector Checklist – Indonesia](#) (2009) checklist also provides valuable information on how to counter identified risks. Here, specific measures for individual sectors are listed that an organization can take to effectively counter sexualized violence (see Figure 5).

16	HEALTH
A	The agency involves female and male community members in addressing issues of SEA.
B	The agency has identified and trained young women to be able to identify the needs of sexually exploited and abused young women for referral to health posts.
C	The agency has intensified the dissemination of information and promotion of the use of health services through the use of radio, schools, health and social clubs, peer education, and community health workers.
D	The agency collaborates with traditional health practitioners to identify, report, refer and provide adequate primary-level support to survivors
E	The agency has identified the gaps and designed strategies to address factors contributing to SEA in health facilities.
F	Medical examinations and treatments are performed by staff trained in SEA and/or GBV, ideally from the same sex as those in need of the services. Alternatively, another medical professional of the same sex is present.
G	The agency has worked with and trained all health personnel to ensure full understanding of the relationship between SEA and health problems.

**Figure 5:** Examples of measures to prevent sexual violence and exploitation in the health sector, excerpt from Preventing Sexual Exploitation and Abuse. UN Agency and Cluster/Sector Checklist - Indonesia

### A practical example: Risk analysis with partner organizations of Christoffel-Blindenmission (CBM)

Elvira Laub

	Project/Activity	Risk event	Effect What impact would the event have on the project's objectives, the people involved and the organization?	Existing risk mitigation strategies List all measures already taken.	Impact Select from 1 to 5	Likelihood Select from 1 to 5	Risk assessment Calculation of Impact x Likelihood	Additional Measures Identify any measures to be implemented, in addition to those already taken, in order to prevent the risk from materializing or reduce its effects	Risk Owner Individual responsible for the risk item.	Timeline Expected completion date for item.	Monitoring/ Reporting timeframes and method.
D	–	Safeguarding (e.g. children, vulnerable adults)									
D1	w	Abuse/mistreatment of a child during medical examinations or physiotherapy	<ul style="list-style-type: none"> <li>Injuries to the person</li> <li>Loss of confidence in personnel</li> <li>Reputation damage to the organization</li> </ul>	<ul style="list-style-type: none"> <li>Development of safeguarding position paper</li> </ul>	5	4	20	<ul style="list-style-type: none"> <li>Safeguarding training for all involved partners.</li> <li>Introduction of the "Two Adults Rule".</li> <li>Set up an incident reporting system.</li> </ul>	–	–	–
D2	Hiring of staff, volunteers or consultants who will be in contact with children or adults at risk	Paedophiles or other abusers could try to get access to children and adults at risk via staff or volunteer positions.		<ul style="list-style-type: none"> <li>Safer recruitment procedures for hiring of staff and volunteers as described in the safeguarding policy (including requirement for checking references of potential new employees) are used.</li> <li>Safeguarding questions are included in interviews.</li> </ul>	5	2	10	<ul style="list-style-type: none"> <li>Put safeguarding commitment in all job descriptions.</li> <li>Reference checks to include whether the person is aware of any concerns about the candidate.</li> </ul>	HR and hiring managers	–	–
D3	Staff visiting communities	Staff alone with children: Exposure to children and adults at risk in communities leading to actual abuse or accusations.		<ul style="list-style-type: none"> <li>The two-adult principle is practiced.</li> <li>An active feedback mechanism is in place.</li> </ul>	5	3	15	<ul style="list-style-type: none"> <li>Have a gender balance if possible among fieldworkers.</li> <li>All programme managers to enforce fieldwork protocols.</li> </ul>	All programme managers	–	–
D4	Images and stories of children and adults at risk used in fundraising campaigns and communication	Traceability of children or adults at risk. Donor tries to contact/find child or adult at risk for inappropriate reasons.	<ul style="list-style-type: none"> <li>Strong data protection measures are implemented within the organization and among partners to protect the information and identities of children and adults.</li> <li>Induction for visitors to the field (consultants, donors, photographers, etc.) on the taking and use of images. Including rules about uploading images of children and personnel.</li> </ul>	4	3	12	<ul style="list-style-type: none"> <li>Check partner's policies concerning sharing children's and adults' information with third parties.</li> </ul>	–	–	–	–

## 2.3 Guidelines and policies to protect against sexualized violence and exploitation

### WHAT DOES THE VENRO CODE OF CONDUCT SAY?

VENRO members shall work to create an environment in which the abuse of entrusted power is effectively prevented and combated. They will develop preventive and reactive standards and work to ensure that their partners also have relevant regulations in place.

In practice, guidelines and policies have proven to form a good basis for effective safeguarding. Such text can be incorporated into an organization's overarching code of conduct, or a separate safeguarding policy or code of conduct for protection against sexualized violence and exploitation can be developed. Standards are effective when organizations properly communicate the code to employees and monitor its compliance.

The → [PSEA Implementation Quick Reference Handbook \(CHS Alliance\) 2017](#) provides an overview of the processes for which guidelines for protection from sexualized violence should be developed.

The CHS Alliance has created a helpful checklist for creating and/or revising codes of conduct in the context of PSEA: → [NGO Checklist for Developing or Revising Codes of Conduct – CHS Alliance](#). The → [VENRO page on child protection](#) also provides information on how to develop a child protection policy within an organization.

### Practical examples of guidelines and codes of conduct for protection from sexualized violence and exploitation:

- [VENRO Code of Conduct](#)
- [Child Safeguarding Policy](#) of Save the Children (German)
- [Guidelines on protection against sexual exploitation and sexual abuse and on child protection](#) of CARE International
- [Code of Conduct](#) of Concern Worldwide (English)
- [Code of Conduct](#) of the Danish Refugee Council

### Ten points for effective guidelines

1. Ownership at the top
2. Ensure user participation
3. Establish standardized procedures
4. Define responsibilities
5. Define training framework for implementation
6. Make policies easily accessible
7. Pass guidelines to partner organizations
8. Develop a framework for monitoring implementation
9. Address guidelines in the recruitment process
10. Maintain an open culture towards feedback

## 2.4 Collaboration with partner organizations

Partner organizations also need to safeguard against risks. They should therefore be taken into account in the risk analysis.

In order to ensure that minimum standards for safeguarding are also in place in partner organizations, many organizations take sexualized violence and exploitation into account in the capacity assessments (when considering collaboration), or carry out additional analysis of the partner's capacities regarding protection from sexualized violence and exploitation. In addition, exclusion criteria for possible partners may also be used.

In addition to risks, the assessment also looks at the extent to which the partner organization has already implemented safeguarding and at what measures are being taken to counter safeguarding risks. Organisations should examine how they can support partners in implementing effective safeguarding.

Many NGOs include guidelines on protection from sexualized violence and exploitation in their partnership and project agreements. In particular, if a risk analysis recommends particular measures, it may be useful to budget these into projects and to discuss this with funding agencies.

### Guidance on how to include policies in contracts:

- [Non-Staff Code of Conduct - Oxfam](#)
- [Examples of PSEA language in contractual agreements – IASC AAP/PSEA Task Force](#)
- [Guidance Note: Application of Child Protection Standards to Staff and Sub-Contractors of Contracted Individuals or Companies - World Vision](#)





Figure 6: Awareness-raising poster (World Vision)

For already existing partnerships, a first step is to develop a common understanding of the topic with the partner. This can, for example, be linked with discussions of gender equality topics. In order to prevent sexualized violence in the context of a project and to support victims/survivors, the topic should be openly communicated with partner organizations and, when possible, directly with local communities. Beneficiaries and local groups should be made aware

of protection from sexualized violence and exploitation so that they can better recognize inappropriate behaviour, build trust and feel confident in approaching the organization with their observations and experiences. For example, many NGOs provide target-group-specific informational material such as flyers, posters, videos → (*To serve with pride*) or presentations → (*World Vision*) (see Figure 6).

It is important to remove the taboo surrounding the issue and to find a balance between appropriate penalties for possible misconduct and open communication about mistakes and difficult situations. The basis for prevention and protection against sexualized violence is that the employees and beneficiaries of the partner organizations feel able to report suspect interactions and events, and do not hold back, for example, for fear of losing support.

In order to anchor safeguarding in the project context, all employees should be trained: those inside and outside an organization, those working abroad and the staff of partner organizations. Depending on the availability of resources and the target group, an organization's safeguarding officers or external providers can conduct the training. Information on whistleblowing systems and reporting routes can also be part of such training. Chapter 4 will examine training and awareness-raising in more detail.



Communication and exchange are an important part of the prevention of sexualized violence and exploitation. © Peek Creative Collective / Shutterstock.com

### 3. Measures human resource departments can take to prevent sexualized violence and exploitation

Effective safeguarding begins with the careful selection of personnel, which, in addition to professional suitability, also takes personal characteristics into account, emphasizing awareness of ethical standards. The aim is to select the candidates who best stand for the organization's values. At the same time, candidates who are potential perpetrators should be deterred and excluded. It is important to understand that sexualized assaults are rarely one-off exceptions or unplanned. Perpetrators are often repeat offenders.

#### Measures in personnel selection and personnel development

The communication of safeguarding policies and guidelines in the job advertisement and subsequent application process (invitation to interview, during the interview) is an important tool for discouraging potential offenders. This also includes the commitment of new hires to comply with relevant standards and policies. If an organization's resolution towards dealing with sexualized violence and its open organizational culture are emphasized during applicants' first contact with the organization (for example in the job advertisement), they will know that the organization takes the issue seriously.

Even after recruitment, the subject should remain relevant and, ideally, systematic awareness raising activities should take place. In team meetings and employee discussions, managers should give room for exchange, questions and suggestions. Regular mandatory and voluntary training



NGOs training their employees: participants in a VENRO training course on integrity and compliance. © VENRO/Lukas Goltermann

#### WHAT DOES THE VENRO CODE OF CONDUCT SAY?

Employees, volunteers, consultants and relevant service providers shall be carefully selected according to their professional and personal qualities. Training includes an explanation of the professional and ethical standards they are to abide by. The terms of employment and collaboration must be designed in such a way that these standards can be adhered to.

can be part of the on-boarding and personnel development process, depending on the size of the organization and the number of employees. It may also be useful to include appropriate training in performance reviews or when setting targets with employees.

Sexualized violence and exploitation can potentially affect many different groups of people who interact with the organization (as perpetrators, victims or witnesses). It is therefore useful to communicate and apply the same standards (and to train) all of the organization's employees (full-time employees and volunteers, those working in and out of the country, committee members, external consultants) regardless of department and position.

Some organizations create guidelines and standards for personnel, such as Kindernothilfe (→ [Human Resources Policy of Kindernothilfe](#), in German).

Figure 7 shows the process of personnel selection and development, and indicates how safeguarding can be integrated in each phase.

#### References and background checks ('certificates of good conduct')

Under German labour laws, references can only be obtained if the candidate gives their consent. Therefore, references may not provide a complete picture and misconduct cannot be openly addressed. One possible strategy, however, is to ask direct questions in the event of discrepancies, which may not be answered by the reference provider thereby giving an indication of inappropriate behaviour. Overall, it is advisable to obtain as much information as possible about applicants and to obtain references.

<b>Job advertisement</b>	<ul style="list-style-type: none"> <li>• Making safeguarding policies and guidelines known</li> <li>• If the legal requirements are met, requesting an extended criminal background check upon recruitment</li> </ul>	<ul style="list-style-type: none"> <li>• Presentation of the attitude towards sexualized violence and open organizational culture</li> </ul>
<b>Background research on applicants</b>	<ul style="list-style-type: none"> <li>• Noting any gaps in their resume/CV</li> <li>• Searching for indications of previous misconduct in job references</li> <li>• Online research</li> </ul>	<ul style="list-style-type: none"> <li>• Not conform with German labour law: Obtaining references without consent</li> </ul>
<b>Interviews</b>	<ul style="list-style-type: none"> <li>• Reference guidelines in policies and interview and ask about values and attitudes</li> <li>• Proactively address issues of protection from sexualized violence</li> <li>• Ask situational questions, and questions about values and attitudes</li> </ul>	<ul style="list-style-type: none"> <li>• Take the protection of applicants seriously</li> <li>• Not conform with German labour law: Questions on criminal records (in general), sexual orientation and/or mental illness</li> </ul>
<b>Recruitment</b>	<ul style="list-style-type: none"> <li>• Have policy/behavioural standards signed as part of the contract</li> <li>• Sign declarations of commitment</li> </ul>	<ul style="list-style-type: none"> <li>• If applicable, request of an extended criminal background check</li> </ul>
<b>On-boarding/probationary period</b>	<ul style="list-style-type: none"> <li>• Mandatory and voluntary training courses to raise awareness and protect from sexualized violence</li> <li>• Communication and education, including on existing complaint mechanisms</li> </ul>	<ul style="list-style-type: none"> <li>• Note the attitude and values of employees during the probationary period (e.g. note to inappropriate language and conspicuous behaviour)</li> </ul>
<b>Feedback discussions/organizational culture</b>	<ul style="list-style-type: none"> <li>• Offer regular training for different target groups</li> <li>• Integration of the topic into feedback discussions and, if necessary, performance reviews</li> </ul>	<ul style="list-style-type: none"> <li>• Establish an open and value-based organizational culture</li> </ul>

Figure 7: Safeguarding measures in personnel selection and development

Obtaining a criminal record check, in Germany a certificate of good conduct, is only partially suitable from a practical point of view. The law distinguishes between a so-called simple (private) certificate of good conduct and an extended certificate of good conduct and regulates the respective contents. Information on certificates of good conduct can be found on the → [Bundesjustizamts](#) (for Germany) website.

In general, however, employers are not allowed to require the presentation of a simple certificate of good conduct during the recruitment process, as it may contain information

### Further tips on the prevention of sexualized violence in the selection of personnel

→ [PSEA Country Office Toolkit](#) by Oxfam

→ [UN Handbook](#) Challenges and options in improving recruitment processes in the context of Protection from Sexual Exploitation and Abuse (PSEA) by our own staff (IASC Task Force on PSEA).



that is not relevant to the job in question and therefore cannot be accessed by the employer. Before a simple certificate of good conduct is required from applicants, the organization should therefore seek legal advice.

On the other hand, an extended certificate of good conduct may be required under certain conditions when working with minors. This is common practice in NGOs working, for example, in child protection and is recommended where the legal conditions are met.

It should be noted that the informative value of a certificate of good conduct – especially a simple one – is limited since it does not include, for example, the suspension of procedures without punitive actions or where misconduct was not reported.

### Notes on the recruitment procedure

It is unlikely that all potential perpetrators can be filtered out, even with targeted measures and interview questions in the application process. Nevertheless, rooting the topic in the application process can deter potential perpetrators. If protection against sexualized violence is openly addressed, the applicant is aware that the organization takes potential threats into account and takes action.

The first step in the interview is to clarify the organization's codes of conduct and corresponding guidelines. Furthermore, specific and direct questions can be used to test the applicant's attitudes and values. However, it should be noted that questions on sexual orientation, criminal records or (mental) illnesses are not permitted.

Some examples of practical questions are provided by → [PSEA Country Office Toolkit](#) of Oxfam GB:

- Why do you think an organization needs a code of conduct?
- Have you worked for an organization that had a code of conduct before? If yes, what difference did it make to the way you viewed yourself and your work, and that of teams you worked in?
- Can you tell us more about your personal motivation to work for our organization?
- In your opinion, what would be the most difficult part of implementing a complaints mechanism?
- What would you do if you knew that a colleague was violating the code of conduct? What would you do if were not sure, but suspected that they were?
- How would you discuss behaviour that could discredit our organization with other employees? How would you initiate such a discussion?

- What would you do if you disagreed with or felt uncomfortable with certain part of the code of conduct or guidelines?

### Protection of applicants

Applicants can also potentially become victims of sexualized violence, especially given the clear imbalance of power.

Measures can include, for example, rules of conduct for interviewers and interviews with at least two people, one of whom is a woman.

Regarding communications, it helps to have standardized processes for agreements and interview procedures, and to record interviews. As far as possible, calls and communication should not take place outside these processes.

Complaints mechanisms should also be explained to applicants.

### Statements of commitment

A declaration of commitment and/or the signing of codes of conduct and guidelines, as an integral part of or supplement to the employment contract, are effective but low-threshold measures that can be introduced quickly and easily. Such commitments can be particularly useful for NGOs that work often with volunteers. Many NGOs already have statements of commitment and codes of conduct signed by employees.

### Practical examples of statements of commitment:

- [Code of Conduct: Prevention of and Response to Sexual Exploitation and Abuse Policy](#) (Help – Hilfe zur Selbsthilfe)
- [Code of Conduct Guidelines](#) (World Vision)



## 4. Training and awareness-raising

Regular training courses serve to raise awareness, strengthen and develop the skills of employees and other stakeholders. They are an important component of effective safeguarding.

In addition to training, open and regular communication on sexualized violence and exploitation, standards, guidelines and processes within the organization play an important role in raising awareness. This applies both to communication between management and employees, and between employees, beneficiaries and local communities.

### 4.1 Training contents and target groups

Awareness raising can begin during the on-boarding phase and should be regularly expanded and refreshed. Prevention is particularly effective when training is provided for employees at all levels, including management. Ideally, these training are adapted to the respective work context and the specific leadership responsibility of the participants. Depending on what resources are available to the NGO, training can also

be offered to individuals such as managers or safeguarding officers, who can disseminate lessons learnt to others, on a case-by-case basis. Training and advice on how to deal with sexualized violence are helpful in preparing for critical situations, especially for employees about to leave on work trips or those stationed abroad. In some NGOs, protection against sexualized violence and exploitation is part of briefing and debriefing on trips and extended stays abroad.

Training includes, for example, the following topics:

- knowledge of sexualized violence and exploitation and their prevention
- approaches to institutional protection (rules of conduct, complaints mechanisms, etc.)
- legal background, e.g. the legal environment in different countries
- private and public support structures such as helplines or advice centres
- information on personal behaviour, mindfulness and responsibility, and how to deal with misconduct and crisis situations
- resilience, empowerment and the exchange of experiences with sexist behaviour and abuse of power

For managers, sensitizing them to structures of power and the right way to deal with misconduct is helpful. This enables them to establish a culture of mindfulness within their teams. Due to the sensitivity of the subject, safe environments are important. Experienced trainers, approaching the topic with care and a thoughtful choice of words, can give participants enough time and space to share their experiences, worries and fears.

Different training formats can be chosen for different target groups and based on context. More modern technology and platforms, such as webinars, online tutorials/tests, videos, social media or virtual augmented reality can also be used. In particular, online training and webinars (interactive with others or to be use by oneself, possibly in combination with tests and videos) are often easily accessible, and once set up they can be used with relatively little effort. For example, mandatory online training courses can be used during on-boarding and repeated at regular intervals. It should be noted, however, that in the case of such a sensitive issue as sexualized violence, online products cannot replace in-person training. Thus they are more suitable as a refresher or as a supplement to face-to-face learning.



Figure 7: information poster for employees (Oxfam)

### What resources are available?

As part of its United Nations Peacekeeping Resource Hub, the UN offers online training on PSEA for UN employees. These materials are free of charge, available at → <http://dag.un.org/handle/11176/90529>.

Online training are available at → [Humanitarian Leadership Academy \(Kaya\)](#) (free) and → [disasterready.org](http://disasterready.org) (for a fee). InterAction offers a → [webinar](#) for implementing measures to protect against sexualized violence and exploitation as well as a → [Handbook](#) with training modules.

In Germany, besides VENRO, Kindernothilfe and → [medica mondiale](#) training courses (for example on child protection or sexualized violence in post-conflict situations) are available. In-

ternationally, BOND offers courses on safeguarding (e.g. → [Safeguarding Essentials](#) and → [Developing Good Safeguarding Practice](#)). The CHS Alliance has published an → [Overview of trainers, experts and consultants](#) on Core Humanitarian Standards and sexualized violence and also offers training courses.

The → [Pick Up and Go Training Pack: Preventing Sexual Abuse and Exploitation: A Training Course for Managers and a Training Pack for Non-Management Staff](#) by Oxfam provides information on how to design a training program. The manual → [Active child protection concrete - training materials for organizations in international development and humanitarian aid](#) (in German) of ECPAT Deutschland, VENRO and Arbeitsgemeinschaft evangelische Jugend offers an overview of modules of child protection instruction, which can serve as a basis for training courses for the prevention of sexualized violence.

Awareness raising and training in the prevention and handling of sexualized violence are also important amongst target groups and local partners. For example, the subject can be introduced via other topics or conveyed with the help of creative formats such as performances. We know from experienced NGOs that it is important to consider the cultural setting and to choose a sensitive (and gender-sensitive) approach (e.g. female-only groups). One example is the training provided by the No Means No NGO in Kenya. The training

courses are aimed at young people, between the ages of 10 and 20. They provide training for girls in self-confidence, empowerment and self-defence and teach boys the concept of consent, non-traditional images of women and how to intervene in the event of attacks. The approach has been very successful and will be implemented more generally in Kenyan high schools (more information at → <https://www.nomeans-noworldwide.org/>).



Men and women working together with flipcharts during a workshop.

### **PRACTICAL EXAMPLE: Kindernothilfe's training programme for partner organizations,**

*Jörg Lichtenberg*

Kindernothilfe offers a practical example of good collaboration with partner organizations. Since 2012 it has implemented a comprehensive training programme on child protection for its partner organizations abroad. The prevention of sexualized violence and exploitation is closely linked to child protection and involves similar measures and approaches. The aim of the training programme is to make the topic of child protection a natural part of partner organizations' work.

**More information on the contents of the training programme can be found at** → [https://www.kindernothilfe.org/multimedia/KNH\\_DE/Neue+Webseite/Downloads/Training\\_Consulting/Abstract+\\_+KNH\\_s+Child+Protection+Capacity+Building+Program\\_EN-p-66812.pdf](https://www.kindernothilfe.org/multimedia/KNH_DE/Neue+Webseite/Downloads/Training_Consulting/Abstract+_+KNH_s+Child+Protection+Capacity+Building+Program_EN-p-66812.pdf)

In three consecutive training modules, partner organizations abroad learn to develop their own child protection policies and successfully implement them together with children. The programme is based on a practice-oriented mix of methods and includes expert inputs as well as practical exercises by the participants, based on realistic scenarios and examples from the country where the training takes place. At the heart of the approach is a

multi-month implementation phase following each workshop, in which, together with the local trainers, the training content is brought into use, accompanied by a structured monitoring process.

More detailed explanations are provided by a practical example from Brazil: → [https://www.kindernothilfe.org/multimedia/KNH\\_INT/KNH\\_English/T\\_C/Child+Protection+Workshop+\\_+Case+study+from+Brazil-p-68444.pdf](https://www.kindernothilfe.org/multimedia/KNH_INT/KNH_English/T_C/Child+Protection+Workshop+_+Case+study+from+Brazil-p-68444.pdf)

Further information about the training programme for partners abroad and about the trainers can be found at → [https://www.kindernothilfe.org/training\\_consulting.html](https://www.kindernothilfe.org/training_consulting.html)

The Kindernothilfe programme is available not only to its partner organizations, but also to all interested international development and humanitarian aid organizations. See → [https://www.kindernothilfe.org/About+us/Training+\\_+Consulting/Our+team.html](https://www.kindernothilfe.org/About+us/Training+_+Consulting/Our+team.html)



### **PRACTICAL EXAMPLE:** **In-house training courses on sexualized violence and exploitation for staff at the Johanniter International Assistance**

*Claudia Zehl*

Protection against sexualized violence and exploitation involves constant reflection on one's behaviour, on power hierarchies and gender inequality, and includes employees' commitment to an organization's internal values. To ensure that the topic is deeply anchored in the organizational culture, all of the foreign aid staff of Johanniter International Assistance are trained at their national headquarters. They receive general awareness raising education. Therein, numerous topics are discussed, such as different forms of sexualized violence, the extent of violence in Germany and the legal environment, profiles of and strategies used by perpetrators, the question 'who is affected?' and institutional protection and risk factors. This is followed by training on international PSEA standards.

During the training courses, interactive exercises are important, not only to convey information, but also to highlight personal experiences and feelings in a secure environment, and thus contribute to the long-term education and awareness-raising of participants. In one exercise, the 'opinion barometer', previously discussed 'real situations and experiences' are shared. In each situation the participants place themselves along a 'barometer' from 'totally acceptable' to 'not well' depending on their perception of their own limits. This exercise vividly illustrates how differently each individual experiences and perceives the crossing of personal boundaries. Within a safe environment, this also leads to exchange between employees and encourages them to ref-

lect on their own behaviour, and leads them to be more sensitive when interacting with one another. The prevention of sexualized violence starts with raising awareness in individuals.

In addition to exchanging their own experiences with personal boundaries, participants also exchange views on cultural differences in the countries of deployment, abuse of power and inequality, racism and discrimination. These phenomena are often the root causes of sexism and sexualized violence. It has become apparent that when discussing such sensitive topics as sexualized violence, sexism and gender inequality in training courses, it is particularly important to carefully differentiate and select the terminology and language used.

The country offices of Johanniter International Assistance are mainly responsible for raising awareness in their respective project country. Together with local teams, the PSEA contact person creates working groups with national organizations, individual trainers or training agencies to raise awareness among Johanniter International Assistance staff and partner organizations in the national language and cultural context. It is important for Johanniter International Assistance that national resources are involved. In doing so, they also rely on the trainers of → [CHS Pool](#). While they prepare training courses, they discuss guidelines of Johanniter International Assistance and the IASC's PSEA minimum standards with the national organizations or trainers. Trainers also make use of the good practice examples of the → [PSEA Taskforce](#). The training programme also deals with questions of concrete support in the creation of policies, the institutionalization of standards, the development of efficient complaints mechanisms and how this can all be developed in a participatory manner with partners.



Participants of a workshop in Cambodia, © Johanniter International Assistance/Claudia Zehl



## 4.2 The role of organizational culture

Organizational culture plays an important role in the prevention of sexualized violence and exploitation. Selective preventive measures should be embedded into an overall strategy for the organization's protective measures, and be supported and institutionally anchored through the promotion of an open, value-based organizational culture. At the same time, cultural change within an organization is a difficult, long-term task, which requires a great deal of commitment, especially from managers.

Three aspects play an important role here:

- **Leaders as role models**

Managers have a leading role in shaping collaboration and the climate within organizations. The tone from the top is thus critical. Managers can contribute to the prevention of sexualized violence by paying attention to communication and collaboration within the organization, so that sexism and sexualized language have no place and personal boundaries are respected. At the same time, employees' trust can be strengthened by managers themselves communicating openly and establishing a feedback culture in which mistakes or critical situations can be addressed. Training courses help them implement this.

- **Openness and transparency**

Collaboration characterized by openness and trust as well as mutual feedback leaves less room for the possibility of sexualized violence and exploitation. If it is made possible to discuss issues such as physical proximity, use and abuse of power, adherence to boundaries, and how to openly address problems, survivors can receive the support they need and misconduct can be identified more quickly. Re-

### WHAT DOES THE VENRO CODE OF CONDUCT SAY?

VENRO members will create a climate in their organizations in which power structures – also between those of different genders – can be openly reflected upon. Their goal is an organizational culture of mindfulness, respect, appreciation and regard for personal boundaries.

VENRO members will create a working environment in which diversity, equal opportunities, gender equality and the protection of children and other particularly vulnerable groups are promoted, and in which all persons involved in the implementation of the organization's goals treat one other with mutual respect.

flecting on these issues should not lead to an environment of suspicion, but rather it should give employees feelings of safety and security as well as protecting them from unfounded accusations. An open culture is also created by identifying and naming risks and situations in which sexualized violence is possible.

- **Criticism of sexist and sexualized language and sexual activities**

If staff give thought to creating respectful interactions and work towards a pleasant, inclusive atmosphere among themselves and with others, they can more easily address sexism, sexualized language and personal boundaries in their everyday work. A private conversation is usually a first step. However, gross or repeated misconduct should be reported to superiors or responsible contact persons.

## 5. Whistle-blower systems and case management

Whistle-blower systems and complaints mechanisms are the ‘eyes and ears’ of the organization, used to identify problems and misconduct at an early stage. Hidden patterns of corruption and abuse of power, as well as weaknesses in the processes and structures of organizations, are often revealed by information provided by employees, partners or other witnesses.

If a person notices a discrepancy or are themselves affected by misconduct, they need a trusted point of contact within the organization. This can be a trusted person in their department or a defined access point via the complaints mechanism. The term ‘complaint’ may be misleading. Through this mechanism, all tips, notes and messages are collected. A complaints mechanism enables victims or others to report suspicious cases in a trustworthy and clearly defined manner. It also enables organizations to deal with these complaints in a structured manner, to create trust and to live up to their responsibility towards victims/survivors and whistle-blowers.

### 5.1 Establishing a complaints mechanism

It is particularly important that the mechanism be accessible to whistle-blowers. This means that it should be designed in such a way that it can be used by everyone: employees, volunteers, partners, local communities or others, who may have observed misconduct in the context of the organization. How accessibility can be ensured will be described later in this chapter.

There are many different ways of designing a complaints mechanism, depending on the needs and capacities of an organization.

#### WHAT DOES THE VENRO CODE OF CONDUCT SAY?

Organisations take action, for example by appointing a neutral ombudsperson, to ensure that employees, volunteers, beneficiaries and third parties can lodge protected complaints or reports of criminal offences, serious misconduct and other serious irregularities (such as corruption, embezzlement, bullying, discrimination or any form of violence) without risking negative consequences.

#### Centralized vs. decentralized complaints mechanism

Depending on the needs and structure of the organization, the complaints mechanism may be centralized (i.e. at headquarters) or decentralized (i.e. at several levels, such as the headquarters, or regional or country level). In practice, it is often a mixture of both.

A centralized complaints mechanism is set up from headquarters and comprises only one level. This means that the responsible contact persons (‘focal points’) are located at headquarters and all information flows through them. An advantage of such a system is that it allows for a better overview of all complaints and cases, and simplifies analysis. Additionally, it supports consistent case management procedures and saves resources at the local and regional levels. However, such a system is often less accessible by target groups and the staff of partner organizations. Moreover, a relatively small group of people have a relatively high level of responsibility, making the system itself more susceptible to misconduct and corruption.

In a decentralized complaints mechanism, on the other hand, local partner organizations are responsible for setting up their own mechanisms, leading to local competencies and contact persons. This makes the mechanism more accessible to local whistle-blowers. In case management, those responsible must ensure that cases are processed consistently and always according to uniform quality standards.

#### Internal vs. external recipients of complaints

Both internal (e.g. a complaints officer) and external (e.g. an ombudsperson) persons can receive complaints. Some organizations use a combination of both.

When selecting those responsible, naturally their trustworthiness, qualifications and ability to act independently must be taken into account.

This can be a full-time, part-time or pro bono position. Some organizations share resources with other organizations (e.g. shared ombudsperson offices). Depending on the size of the organization and the area of responsibility, the chosen persons need to be granted sufficient capacity to receive complaints and to manage cases in order to provide support to stakeholders and whistle-blowers (see ‘What qualifications should ombudspersons and those acting as focal points have?’ in the text box on page 25).

## Various entry points

An entry point is the path on which a notice or complaint is received. There are a number of possible entry points (see ‘What makes good entry points?’ in the text box on this page). An effective complaint mechanism usually has various entry points, often anonymous. In order to simplify the complaints mechanism, entry points should be adapted to the needs of users (e.g. for those unable to read or children). The design of entry points is an important aspect in the design of a complaints mechanism. Entry points should be as diverse and barrier-free as possible, because an effective complaints mechanism depends on whether whistle-blowers are able to (and want to) use it.

### What makes good entry points?

- Those chosen as focal points should be considered trustworthy by users and may even have been chosen by them.
- A diversity of entry points should be offered, especially considering vulnerable groups (people with disabilities, women, children, the elderly, those unable to read, etc.).
- The roles and responsibilities of everyone involved should be clearly named and communicated.
- There should be clear rules on how information related to the complaint is disclosed or confidentially treated.
- It should be possible to submit complaints/notices for another person anonymously.
- There are safe spaces for witnesses and informers if they are threatened due to a complaint.
- Examples of possible entry points include feedback boxes, text message systems, telephone numbers, interviews, web applications and e-mail, confidants/focal points, consultation hours for beneficiaries of the project, pre-paid envelopes, video messages, children’s street theatre and painting pictures with children with explanations.
- In humanitarian aid, group discussions and confidants are often used as entry points.

### What should be considered when establishing a complaints mechanism regarding cases of sexualized violence and exploitation?

A separate complaints mechanism can be set up for cases of sexualized violence and exploitation, or a general mechanism can be used. These have certain advantages and disadvantages. On the one hand, mechanisms intended exclusively for cases of sexualized violence and exploitation can sometimes



Schoolchildren in Stone Town/Tanzania, © Avatar\_023/Shutterstock.com

### What should be taken into account in a complaints mechanism for children and adolescents?

Countless research and experience from practice show that children and adolescents choose other channels for complaints than adults. They often first turn to their peers and friends. Many schools and other institutions that work with children therefore select trusted persons from among the children or use teachers/supervisors who are elected by the children themselves. It is important that these individuals are also trained to report cases of sexualized violence. Further information can be found in the → [Interagency Study on Child-Friendly Feedback and Complaint Mechanisms within NGO programmes - educo/Plan international/Save the Children/War Child/World Vision](#)

constitute a barrier for those affected. On the other hand, indications of sexualized violence and exploitation are serious and should be treated with necessary sensitivity and priority. NGOs often have different, interlocking and complementary systems. These depend on the needs of the organization. Large organizations with many local partners in different countries often have more and greater varied systems than smaller NGOs with only a few projects and partner organizations.

It is important to offer a large number of possible entry points, as whistle-blowers and survivors/victims can require very different approaches. Some prefer an anonymous option or an external, independent person, while others prefer a trusted, familiar face. Non-bureaucratic and low-threshold reporting channels (e.g. the contact person being easy to reach, informal e-mails or post boxes) can help. In many cases, victims/survivors have feelings of shame, guilt or fear.

Social stigmatization or threats can often play a role here. It is important that the complaints mechanism and those responsible for it take into account the specific circumstances of the survivor(s) and deal with cases sensitively. Organizational culture and the approach to protection from sexualized violence in the organization also contribute to making the complaints mechanism effective.

### What should be considered when setting up an effective complaints mechanism?

- **Ownership and open organizational culture:**

For the complaints mechanism to receive full support, it is important to discuss it within the organization and to involve management from the outset. The organization's leadership also plays an important role in establishing the complaints mechanism by promoting an open-minded and (self-)critical organizational culture, open to feedback and improvement.

- **Allocate resources:**

For a complaints mechanism to function, the necessary human and financial resources must be available and planned in advance. However, not every organization needs a comprehensive complaints mechanism. The scope must be adapted to the available resources. However, if a complaints mechanism is not effective, (potential) users will lose confidence in it.

- **Participatory development:**

Many NGOs have found that (potential) users (employees, beneficiaries, partner organizations) know best what their requirements for an effective complaints mechanism



Participants of a workshop discuss the establishment of a complaints mechanism for a project in Cambodia. © Johanniter International Assistance/Claudia Zehl

### WHAT DOES THE VENRO CODE OF CONDUCT SAY?

Complaint mechanisms must be designed to ensure that all complaints or messages are taken seriously, and dealt with directly and appropriately, with clear procedures and delegated responsibilities. Appropriate precautions must be taken to protect the complainants, victims and the accused. The possibility of filing complaints and reports should be as low-threshold and barrier-free as possible so that their use by victims or potential victims, including minors and people with disabilities, is encouraged.

are. Therefore, it is helpful to speak with them during the design phase, in order to obtain feedback and identify possible obstacles or barriers. This also strengthens users' confidence in the complaints mechanism.

- **Create trust:**

The first imperative for an effective complaints mechanism is to guarantee users' confidentiality. For one, this means that the identities of whistle-blowers, victims and defendants are protected. Additionally, this means that only a limited and predefined group of people has access to information. Those responsible should be trustworthy and have the right qualifications to handle complaints. Confidence is also created through the mechanism's transparency.

- **Ensure accessibility and identify barriers:**

A complaints mechanism only works if it is used by victims/survivors and whistle-blowers and is accessible to as many groups of people as possible. To this end, the mechanism should be made as barrier-free as possible from the outset. Barriers can be due to, for example, gender, ethnicity, religion, language or disability, or due to the lack of adequate whistle-blower protections. Barriers can even exist in seemingly trivial things: The NGO Tearfund replaced the word 'complaint' with 'suggestion' in their feedback boxes in local communities in Kenya because the original wording deterred people from providing input.<sup>8</sup> Many organizations and their partners offer various different reporting channels, so it is worth seeing which reporting channels work for the organization.

- **Communication and training:**

All potential users should be informed about the purpose and functioning of the complaints mechanism. Among other things, it should be made transparent who is respon-



sible for accepting and processing complaints, how this process takes place and how users are protected. This should be communicated internally (e. g. through regular training courses, web pages, posters, flyers, performance reviews) as well as externally (e. g. through public meetings, presentations, newspapers, radio).

- **Establish guidelines:**

The rules which govern the complaints mechanism and its corresponding procedures should be laid out in guidelines. Employees should sign statements that they have accepted the guidelines and are trained in relevant procedures. An example is the → [Malteser International Whistleblowing Guideline](#).

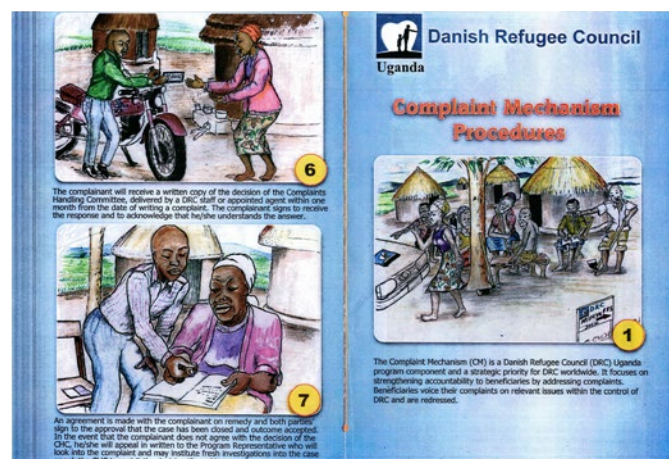


Figure 9: brochure explaining the complaints mechanism (Danish Refugee Council)

### What qualifications should ombudspersons and those acting as focal points have?

The technical background sought depends on which types of cases the responsible person is to supervise. Safeguarding can be undertaken by those with legal, social, psychological or counselling training. However additional qualifications and experience in safeguarding, child protection, compliance and the current legal environment are also helpful. A good candidate should receive regular training in these topics.

In addition to professional qualifications, personal skills and qualities, such as sensitivity, trustworthiness, excellent communication skills, a high degree of personal commitment and intercultural competence, are particularly important when it comes to protection from sexualized violence and exploitation. The person selected should be considered trustworthy within the organization, and ideally they should regularly visit the organization and, where appropriate, the projects (for example once or twice a year).

Two examples of the activities and responsibilities of focal points or ombudspersons are → [Fundamentals of the position and activities of an ombudsperson of Don Bosco Mondo \(in German\)](#) and → [PSEA Focal Point Roles and Responsibilities - GCPS Consulting](#).

### PRACTICAL EXAMPLE: The complaints mechanism of the Christoffel-Blindenmission

Karin Ott

To ensure effective safeguarding, the Christoffel-Blindenmission (CBM) has set up a complaints mechanism at several levels. This was developed with participation of its users and is intended to be accessible to all potential whistle-blowers and victims/survivors via as many entry points as possible.

The complaints mechanism of the CBM consists of three reporting channels. They are open to all those involved in the CBM's work, including partner organizations and their staff, as well as beneficiaries and local communities. For each reporting channel, different individuals and departments within CBM are responsible for deeply anchoring the complaints mechanism in the organization and ensuring its independence.

The first reporting channel is a general feedback system for programme work that is open to tips and complaints, as well as general (positive as well as negative) feedback. The feedback system is intended to contribute to confidence building and overall transparency. Messages can be sent by post or e-mail in several languages. Beneficiaries and local communities may also provide reports into the system via CBM employees, who are encouraged to receive all feedback, including complaints. The system is not anonymous, but it is confidential. Each report will be assigned a number to ensure its systematic and confidential processing. Only as many people as necessary are involved in the case's processing. Whistle-blowers have the opportunity to decide on which groups of people are to be involved in sensitive issues.

In addition, there is a specific complaints mechanism for safeguarding, which is open to all suspected cases of abuse, such as physical or emotional abuse, neglect, sexual harassment and sexualized violence and exploitation. In every CBM office, worldwide, there is a responsible person, the safeguarding manager, as well as trained contact persons. All incidents, including suspected incidents of misconduct, should be reported to the safeguarding contact persons in the respective office. This is done via a written form, by e-mail, SMS, telephone and/or via a personal conversation. The safeguarding manager can also be contacted directly by e-mail. Furthermore, target groups are explicitly informed that all forms of abuse can be reported via any of the provided channels. Cases that are reported via other channels are relayed to the responsible safeguarding officers. The safeguarding complaints mechanism is not anonymous, but complaints are treated confidentially.

Finally, there is an entirely anonymous whistle-blower channel. It serves to allow the reporting of any kind of misconduct, including corruption and any form of violence and abuse of power such as sexualized violence and exploitation. The → [online whistle-blower channel](#) is accessible through the CBM website and is available in several languages. Whistle-blowers can submit reports anonymously and can also be contacted anonymously for case management via the web application. For the whistle blower channel, CBM uses an external service provider's system.<sup>9</sup>

There are also other channels for feedback and providing reports, such as a crisis hotline, and a mediation/arbitration process for conflicts between employees or employee representatives. Feedback transmitted to the organization via these channels is passed on to the responsible focal points and further processed.



Schoolchildren in Moshi, Tanzania, © CBM/argum/Einberger

## WHAT DOES THE VENRO CODE OF CONDUCT SAY?

All references to sexualized violence shall be investigated in an appropriate manner. Persons affected by sexualized violence must receive protection and support; in individual cases this may also include support for victims to receive compensation. Actual misconduct shall be met with appropriate penalties, including consequences under labour and criminal law. The accused who are found to be innocent shall be fully exonerated.

### 5.2 Handling of complaints and effective case management

A complaints mechanism allows victims/survivors and whistle-blowers to provide reports to their organization. The reports cover not only serious cases, but often also difficult, ambiguous or otherwise ‘unclear’ situations.

Practice has shown that the existence of many messages/notifications is a sign of an effective complaints mechanism, contributing to effective safeguarding. Few reports, on the other hand, does not necessarily indicate that there are no cases of sexualized violence in the organization. There may still be witnesses and survivors who do not share their observations and experiences with the organization. This presents a great challenge to safeguarding (more on page 31).

In order to ensure that case management works smoothly, in the event of a report, an effective complaints mechanism includes a standardized process for dealing with incoming notices or complaints. This ensures consistency in processing, equal treatment of all notices and complaints and transparency towards users.

In the following, we will look into concrete steps of case management. It should be noted that this is a general procedure which varies in its design depending on the type of complaints mechanism and the organization. Experience from different organizations shows that it is important to provide adequate resources for case management. A loss of confidence can occur if reported cases are not properly followed up. In their report → No One to Turn To – The under-reporting of child sexual exploitation and abuse by aid workers and peacekeepers, Save the Children cite the inadequate or failed handling of reported cases as one of the causes of lack of trust among those affected by sexualized violence.

## PHASE I: Receiving a report or complaint

- **Receiving a complaint:** The recipient registers the incoming message in standardized, written form. Reports of sexualized violence are dealt with sensitively, especially in the case of complaints received personally, and attention is paid to the use of appropriate questions. In some cases further immediate support is needed (more on page 32).
- **Acknowledging receipt:** The whistle-blower will receive a written acknowledgement that the complaint has been received together with a deadline for a reply, unless the notification was made anonymously.
- **Identifying the type of complaint:** Reports may be treated differently depending on their severity. In the case of sexualized violence and exploitation, complaints are always treated seriously.
- **Identifying risks and protecting those involved:** People who file a complaint can face certain risks and threats such as physical threats, insults, blaming, retaliation and the use of physical force. Those in charge of the complaints mechanism should identify these risks and ensure protection and care. In the case of sexualized violence, medical and psychological care is usually also necessary. Protection must also be guaranteed to those accused until the accusation can be proven true or false.
- **Dealing with malicious complaints:** Although in practice it is the exception, sometimes intentionally untrue reports (known as malicious complaints) are made, for example by frustrated or disappointed individuals. It is useful to make the recipients of complaints aware of this. For example, malicious complaints can often be identified by the fact that they are not specific or well-documented, and may contain angry language.
- **Deciding whether to investigate:** Upon receipt of a complaint, the responsible person needs to decide whether to initiate an investigation or whether the case can be solved on the basis of secondary research, i.e. by reviewing documents. Is there enough information available to initiate an investigation? Is there enough evidence to already decide upon the case? As a rule, serious complaints (as in the case of sexualized violence) should be more deeply investigated, provided that the victim/survivor agrees (more on support for the person concerned on page 32).
- **Planning the next steps:** The responsible persons determine all the following steps and set out deadlines so that the process is transparent and the whistle-blower feels



safe and taken seriously. It is important that further steps are discussed with victims/survivors. The time needed to process a report depends on various factors. Those responsible shall try to process the cases as promptly as possible, and also provide statements following realistic timelines.



A suggestion box in a hall. © Eryn Rachelle K Macarayan

## PHASE II: Investigation

- **Determining the investigation method:** The method will depend on the complaint. The task of the investigation team is to gather as much evidence as possible. This sometimes must take place in secret. Evidence can take different forms. This includes, for example, witness statements, documents (meeting minutes, video recordings, photos, computer files, etc.), physical evidence (crime scene investigation, medical examination) or expert statements. The investigation team should approach an investigation in a neutral and unbiased manner, and carefully document their investigations and all evidence.
- What action should be taken for criminal offences?**

As soon as it becomes clear that a criminal offence is potentially involved, the responsible body (e.g. management) must decide whether, when and how to involve local or national authorities. It is advisable to seek legal advice in any case. Some victims/survivors do not want the case to be followed up or criminal charges to be filed. This must be respected. The support and protection of survivors and witnesses takes top priority. This is particularly true in countries where there are doubts as to the police and judiciary's trustworthiness. In the event that an internal investigation is handed over to the national authorities, the internal investigation should be closed and evidence should be handed over to support the police investigation. The country-based legal specifics must be taken into account: for example, is it a criminal offence not to immediately inform the authorities? What is the legality of the reporting of criminal offences in the area of sexualized violence?

Since 1993, the principle of extraterritorial criminal prosecution has applied in Germany and many other countries in order to provide for more effective prosecution of sexual offences abroad. Thus a perpetrator can be prosecuted and punished under German law for an offence committed abroad even after their return. Punishment will take place in Germany, but evidence must be presented abroad and meet German standards.
- **Forwarding the complaint to higher authority:** Serious complaints are forwarded by those responsible to a higher authority, e.g. a complaints committee.
  - **Appointing an investigation team:** An ad hoc investigation team consisting of employees with the necessary knowledge is set up. The complaints mechanism determines who will appoint the investigation team. The group first agrees on their roles and responsibilities and documents them. In the context of safeguarding, the respective safeguarding officers are involved and external experts shall be called in if necessary. These can be experienced investigators (recommendations are provided by → [CHS Alliance](#)), lawyers or communication experts. Due to the sensitive nature of the issue and the importance for and traumatic burden on those affected, investigators must have a specialized background and appropriate training.
- The following manuals provide detailed instructions on how to conduct an investigation and examples of supporting documents:**

  - [Complaints Handling and Investigation Guidelines for The Act Alliance \(2010\)](#)
  - [CHS Alliance Handbook GUIDELINES FOR INVESTIGATIONS – A guide for humanitarian organizations on receiving and investigating allegations of abuse, exploitation, fraud or corruption by their own staff \(2015, English and Arabic\)](#)
  - [Best Practice Guide – Inter-Agency Community-Based Complaints mechanisms - Protection against Sexual Exploitation and Abuse of IASC, IOM, Save the Children and UNHCR](#)



### Procedure for managing cases of suspected abuse, Scenario 1: Internal cases of suspected abuse

**Person under suspicion:** staff member; member of the Management Board, Supervisory Board or General Assembly; apprentice; temporary or freelance staff member; student assistant; intern; school student; self-employed contractor or volunteer

**Alleged victim:** a child below the age of 18 years being supported directly or indirectly by Save the Children Deutschland e. V.

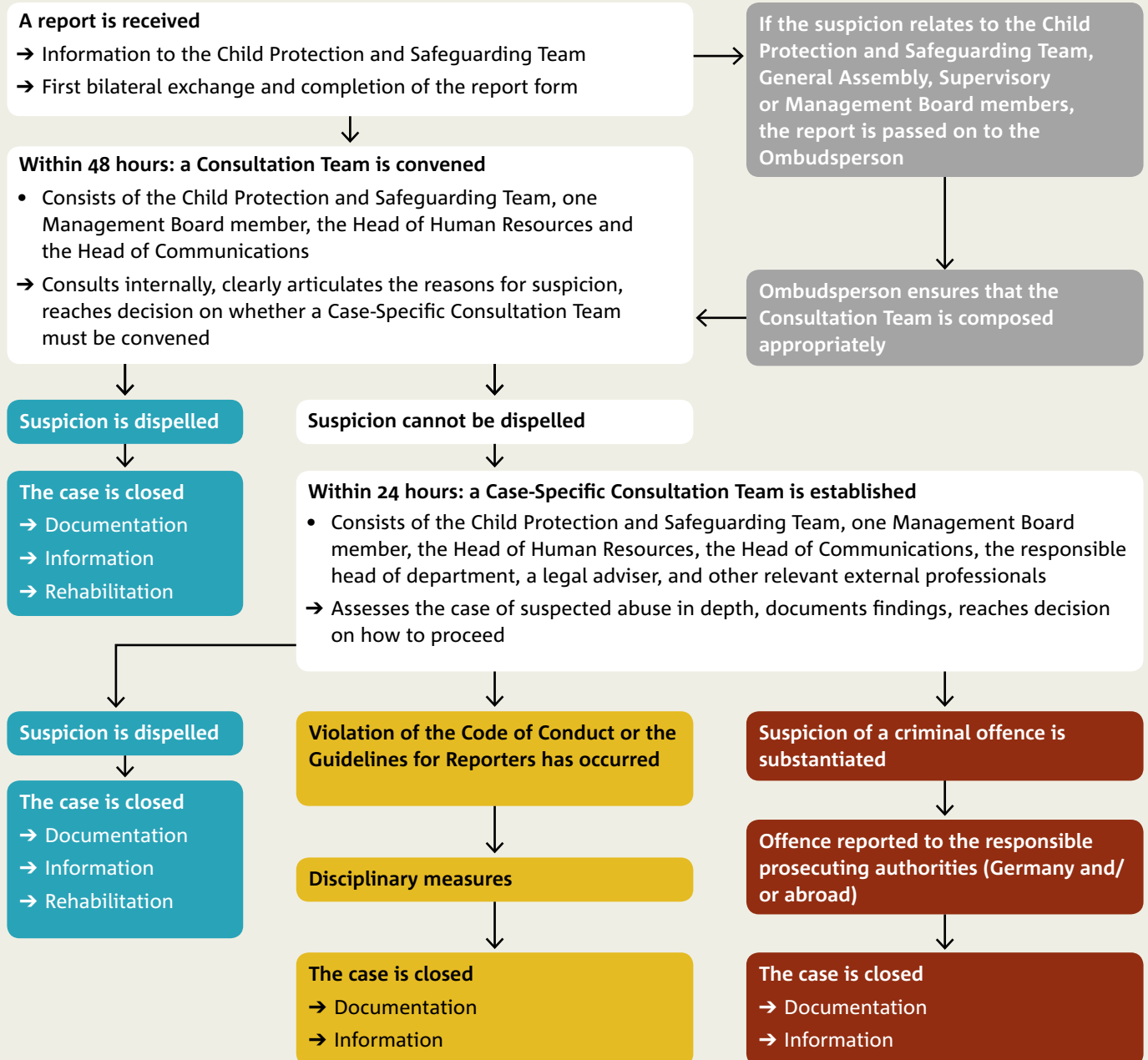


Figure 10: Example of the case management process from Save the Children's child protection policy

### Phase III: Decision-making and penalties

Once a case has been resolved, a transparent, comprehensive and proportionate penalty shall be imposed. In detail, the nature of the penalty depends on the seriousness of the offence. Penalties can range from a warning or an entry in personnel files, to a demotion, a loss of job, or referral to the relevant authorities. If those affected take private legal action, they may receive financial compensation. If the case concerns a partner organization, there may be a temporary hold on or termination of collaboration, a claim for redress or other contractual penalties. Penalties also act as a deterrent for potential perpetrators. In the case of a criminal offence, the case is referred to the law enforcement authorities (see the text box on ‘What action should be taken for criminal offences?’ on page 28).

- **Taking a decision:** The decision shall not be taken by the body conducting the investigation. A higher authority will make a final decision based on the written recommendation of the investigation team. The same procedure shall apply to the termination of the investigation. Again, the investigation team makes a recommendation, but a higher authority will decide whether to close an investigation.
- **Informing the persons involved:** The whistle-blower, the accused and the victim/survivor are informed of the result.
- **Filing an appeal:** A mechanism allows both the complainant and the accused or convicted person the right to formally appeal the decision. They must explain the reasons for the appeal and comply with a specified deadline.
- **Documenting the process:** All steps of the complaints procedure are documented in writing, as detailed as possible and in accordance with relevant data protection laws. This allows for the cases’ systematic analysis.
- **Publishing of an annual complaint report:** An annual complaint report containing information on all cases received and dealt with can help to combat misconduct.
- **Assessment:** The complaints mechanism should be evaluated regularly to identify shortcomings, challenges and needs for improvement.

→ The [Complaint Mechanisms for Non-Governmental Organizations – A Practitioner’s Guide](#) handbook by Luise Ammerschuber and Elisabeth Schenk, which is also the basis for this chapter, provides detailed information and practical examples on how to set up a complaints mechanism as well as a helpful checklist.

→ The [Best Practice Guide – Inter-Agency Community-Based Complaint Mechanisms – Protection against Sexual Exploitation and Abuse](#) (IASC/IOM/Save the Children/UNHCR) and → [Complaints Mechanism Handbook](#) (Danish Refugee Council) handbooks provide valuable practical advice and tools for setting up and implementing a complaints mechanism.

### PHASE IV: Systematic analysis, reporting and improvement

The complaints mechanism can also be instructive. Through the systematic analysis of all cases, it is possible to identify and address structural failures and improve an organization’s practices and processes.

- **Case analysis:** The systematic analysis of written records can reveal structural failures in the organization. Once identified, they can be addressed through new (or revised) guidelines, structures or processes.



Women demonstrating against rape in Calcutta, India.  
© arindambanerjee / Shutterstock.com

### 5.3 Survivor protection and support

The needs, protection and best possible support of victims and survivors of sexualized violence should be at the forefront of all safeguarding measures taken by organizations.

However, cases of sexualized violence are often not recognized or otherwise go unreported. There may be different reasons for this. Many are afraid of not receiving the support they need or of not being taken seriously, or being rejected, stigmatized, discriminated against or threatened. Sometimes there is a feeling of powerlessness regarding authorities or cultural barriers. In some cases, however, there is also a lack of knowledge about complaints mechanisms in place (e.g. reporting channels, guarantee of anonymity, protection of those affected) or a lack of trust in the organization's case management capabilities. More information can be found at → [Underreporting of SEA \(PSEA Taskforce\)](#).

Therefore, if a complaints mechanism receives few or no reports, it is worth taking a closer look at possible causes:

- Do the users lack confidence that the information will be handled appropriately?
- Is there sufficient communication about the complaints mechanism?
- Are there various different, low-barrier and anonymous entry points?
- Are cultural aspects sufficiently taken into account?
- Is there enough awareness among target groups?
- Is there an open, mindful organizational culture?

Good whistle-blower systems are based on trust. When a case is reported, the protection and best possible support for those affected is paramount. Therefore, many NGOs take a *survivor-centred approach*. This includes that organizations and competent individuals do the following.

- treat victims/survivors respectfully and, in particular, avoid victim blaming
- protect victim's/survivor's identity and ensure confidentiality
- respect the autonomy and freedom of decision of the victim/survivor, for example when it comes to whether the case will be pursued or referred to law enforcement authorities
- support those affected in the best possible way and to put their wishes and needs first (primarily medical, psychological and legal support)
- train and raise awareness among vulnerable groups, make their rights clear to them and strengthen and empower them
- take into account the personal, family and cultural circumstances of the victim/survivor
- develop programmes and projects for the prevention of gender-specific violence, such as human-rights-based education and empowerment for women and girls



Those affected should receive medical support. © ANORAKE SING-TO ON / Shutterstock.com

### What does this mean for supporting victims/survivors in case management?

When a victim/survivor reports a case, the respondent should be sensitive and ask appropriate questions to obtain information about the details of the event. First and foremost, it is important to listen to and counsel those affected. The person affected needs support and, where appropriate, medical, psychological or legal assistance. Trained safeguarding officers/employees should be at hand to assist and support those affected as best they can.

In consultation with the person concerned, measures such as immediate transfer to another team or leave of absence can also be considered. The needs and wishes of the victim/survivor should always have the highest priority. For example, people may not want a case to be followed up or they may not want to accept offers of support. This must always be respected and no pressure should be exerted.

The identity of those affected must be protected at all times. Information and statements of the concerned party shall be treated confidentially and they shall decide who has access to such information.

Further guidance on how to support those affected can be found, for example, in the → [SEA Victim Assistance Guide – ECHA/ECPS UN & NGO Task Force on PSEA guide](#).

### How can whistle-blowers and the accused be protected?

Most complaints mechanisms include a possibility for anonymous reporting so that whistle-blowers do not have to reveal their identity. All the same, it is important to treat even non-anonymous information confidentially.

If a case is reported in which the whistle-blower or other parties involved are potentially exposed to a danger, protective measures shall be taken. These can include, for example, short-term leave, police protection, medical and psychological support and legal assistance. The identity of accused person(s) is also protected until proven guilty.

The accused shall be considered innocent until proven guilty. The accused shall be informed of their rights as part of the investigation. The accused may have the right to withhold confidential information. In no case will the defendant be informed of the names of the victims, whistle-blowers or witnesses. The name of the accused will also be kept confidential during the investigation in order to protect the person. Those wrongly accused shall be exonerated.

### 5.4 Case monitoring and reporting

Documenting and reporting on cases is a good way for organizations to learn how to best handle cases. Comprehensive documentation and analysis can help an organization monitor its work and examine its structures. For example, a report may include an analysis of all cases reported within the organization, how they have been dealt with and lessons learnt. Reports should be anonymized and not reveal any data on affected persons, including witnesses or the accused.

For the sake of transparency and accountability, it may be beneficial to publish these reports or to include the results of the analyses in an organization's annual report. With the help of transparent reporting, organizations can show that they take corruption and abuse of power and the implementation of their codes of conduct seriously. Reporting by many organizations can also reduce the effects of sudden scandals and strengthen confidence in the NGO sector.

Good practice examples are provided by → [Diakonia](#) with their succinct report and by → [DanChurchAid](#), with a very clear analysis and lessons learnt from the reported cases. Further information on case reporting is available in the → [Guidance Note and Protocol on Publishing Complaints Metrics](#) from the CHS Alliance.



Establishment of a complaints mechanism	<ul style="list-style-type: none"> <li>• Users involved right from the start</li> <li>• Taking into account the conditions of the working environment</li> <li>• All employees made aware of the complaint mechanism; processes and procedure discussed together</li> <li>• The filling of complaints made available to all groups</li> <li>• Creation of low-threshold entry points</li> </ul>
Receiving a report	<ul style="list-style-type: none"> <li>• What type of message is it?</li> <li>• Identification and rapid response to immediate security risks</li> <li>• Decision-making as to who should or should not be informed of the report</li> <li>• Formal confirmation sent to whistle-blower</li> <li>• Decision-making whether to open an investigation; if there is no investigation, inform whistle-blower</li> </ul>
Investigation	<ul style="list-style-type: none"> <li>• Establishment of the investigation team</li> <li>• Planning the investigation</li> <li>• Gathering of evidence</li> <li>• Validation of evidence</li> <li>• Presentation of results</li> <li>• Conclusions and recommendations</li> <li>• Presentation of the report</li> </ul>
Decision-making and lessons learnt	<ul style="list-style-type: none"> <li>• Decision-making and implementation</li> <li>• Informing the parties of the outcome of the complaint</li> <li>• Opportunity for appeal</li> <li>• Documentation</li> </ul>
Monitoring, evaluation and further development	<ul style="list-style-type: none"> <li>• Findings included in the annual report, if applicable</li> <li>• Monitoring in cooperation with employees: participation in training courses, including the improvement of quality assurance and accountability</li> <li>• Evaluation of the effectiveness of local mechanisms</li> </ul>

Figure 11: overview of a hypothetical complaints mechanism structure<sup>10</sup>

## Literature overview and other sources

### Helpful websites

- <https://www.bond.org.uk/ngo-support/safeguarding>
- <https://www.chsalliance.org/get-support/pseah/>
- <http://thewww.pseataaskforce.org/en/>
- <https://venro.org/themen/safeguarding/>
- <http://kindesschutz.venro.org/>

### General information/overviews

*CHS Alliance (2017): PSEA Implementation Quick Reference Handbook* → <https://www.chsalliance.org/get-support/resource/psea-implementation-quick-reference-handbook/>

*Interagency Working Group on Sexual Exploitation of Children (2016): Terminology Guidelines for the Protection of Children from Sexual Exploitation and Sexual Abuse* → <http://luxembourgguidelines.org/>

*Inter-Agency Standing Committee (IASC) (2016): Minimum Operating Standards-Protection from Sexual Exploitation and Abuse by own Personnel (MOS-PSEA)* → [https://interagencystandingcommittee.org/system/files/3\\_minimum\\_operating\\_standards\\_mos-psea.pdf](https://interagencystandingcommittee.org/system/files/3_minimum_operating_standards_mos-psea.pdf)

*IASC (2016): Guidelines to implement the Minimum Operating Standards for Protection from Sexual Exploitation and Abuse by UN and non-UN Personnel* → <https://interagencystandingcommittee.org/protection-sexual-exploitation-and-abuse/documents-public/guidelines-implement-minimum-operating>

*IASC (2015): Guidelines for Integrating Gender-Based Violence Interventions in Humanitarian Action* → [https://gbvguidelines.org/wp/wp-content/uploads/2016/10/2015\\_IASC\\_Gender-based\\_Violence\\_Guidelines\\_full-res.pdf](https://gbvguidelines.org/wp/wp-content/uploads/2016/10/2015_IASC_Gender-based_Violence_Guidelines_full-res.pdf)

*InterAction (2010): Step by Step Guide to Addressing Sexual Exploitation and Abuse* → <http://www.pseataaskforce.org/uploads/tools/1330532150.pdf>

*PSEA Taskforce: Toolbox* → <http://www.pseataaskforce.org/en/tools>

*United Nations (2017): Glossary on Sexual Exploitation and Abuse* → [https://hr.un.org/sites/hr.un.org/files/SEA%20Glossary%20%20%5BSecond%20Edition%20-%202017%5D%20-%20English\\_0.pdf](https://hr.un.org/sites/hr.un.org/files/SEA%20Glossary%20%20%5BSecond%20Edition%20-%202017%5D%20-%20English_0.pdf)

*UNICEF (2018): Child Safeguarding Toolkit for Business* → [https://www.unicef.org/csr/files/UNICEF\\_ChildSafeguardingToolkit\\_FINAL.PDF](https://www.unicef.org/csr/files/UNICEF_ChildSafeguardingToolkit_FINAL.PDF)

### Complaints mechanisms and case management

*Ammerschuber, L. & Schenk, E. für Brot für Alle (2017): Complaint Mechanisms for Non-Governmental Organisations – A Practitioner's Guide* → [https://brotfueralle.ch/content/uploads/2017/04/Complaint-Mechanisms\\_final.pdf](https://brotfueralle.ch/content/uploads/2017/04/Complaint-Mechanisms_final.pdf)

*CHS Alliance (2015): GUIDELINES FOR INVESTIGATIONS – A guide for humanitarian organizations on receiving and investigating allegations of abuse, exploitation, fraud or corruption by their own staff* → [https://reliefweb.int/sites/reliefweb.int/files/resources/Investigation-Guidelines-2015\\_Eng.pdf](https://reliefweb.int/sites/reliefweb.int/files/resources/Investigation-Guidelines-2015_Eng.pdf)

*CHS Alliance (2015): Guidance Note and Protocol on Publishing Complaints Metrics* → <https://www.chsalliance.org/get-support/resource/guidance-note-and-protocol-on-publishing-complaints-metrics/>

*DanChurchAid: Complaints Reports* → <https://www.danchurchaid.org/how-we-work/quality-assurance/anti-corruption/complaints-handling-system>

*Danish Refugee Council (2008): Complaints Mechanism Handbook* → [http://www.pseataaskforce.org/uploads/tools/complaintsmechanismhandbook2008\\_danishrefugeecouncil\\_english.pdf](http://www.pseataaskforce.org/uploads/tools/complaintsmechanismhandbook2008_danishrefugeecouncil_english.pdf)

*Diakonia: Complaints reports* → <https://www.diakonia.se/en/How-we-work/Quality-assurance/Complaints-and-Response-Mechanism/>

*Don Bosco Mondo: Grundlagen der Stellung und der Tätigkeit einer Ombudsperson* → [https://venro.org/fileadmin/user\\_upload/MON\\_R5\\_Ombudsperson.pdf](https://venro.org/fileadmin/user_upload/MON_R5_Ombudsperson.pdf)

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IASC, IOM, Save the Children und UNHCR: Best Practice Guide – Inter-Agency Community-Based Complaint Mechanisms – Protection against Sexual Exploitation and Abuse → <https://interagencystandingcommittee.org/accountability-affected-populations-including-protection-sexual-exploitation-and-abuse/documents-50>

Malteser International (2016): Whistleblower Guidelines → [https://venro.org/fileadmin/user\\_upload/0.3.1\\_MI\\_OH\\_Whistleblowing-GL\\_EN\\_09-06-2017.pdf](https://venro.org/fileadmin/user_upload/0.3.1_MI_OH_Whistleblowing-GL_EN_09-06-2017.pdf)

PSEA Taskforce: Underreporting of SEA → <http://www.pseataaskforce.org/en/overview>

The Act Alliance (2010): Complaints Handling and Investigation Guidelines for The Act Alliance → <https://actalliance.org/documents/act-alliance-complaints-and-investigation-guidelines/>

United Nations (2009): SEA Victim Assistance Guide Establishing Country-Based Mechanisms for Assisting Victims of Sexual Exploitation and Abuse by UN/ NGO/IGO Staff and Related Personnel → <http://www.pseataaskforce.org/uploads/tools/1338829369.doc>

## Selection of personnel

Conen, Marie-Luise (2006): Tools to help avoid the recruitment of paedophiles (in German) → <https://www.caritas.de/cms/contents/caritasde/medien/dokumente/fachthemen/sexuellermissbrauch/personalakquiseperso/20arbeitshilfenperso/20%20arbeitshilfen%20personalauswahl.pdf?d=a&f=pdf>

Help – Hilfe zur Selbsthilfe: Code of Conduct: Prevention of and Response to Sexual Exploitation and Abuse Policy → [https://venro.org/fileadmin/user\\_upload/Dateien/Daten/Publikationen\\_weitere/Good\\_Practice/CoC\\_Policy\\_on\\_Prevention\\_of\\_and\\_Response\\_to\\_Sexual\\_Exploitation\\_V1.1\\_Jan\\_2017.pdf](https://venro.org/fileadmin/user_upload/Dateien/Daten/Publikationen_weitere/Good_Practice/CoC_Policy_on_Prevention_of_and_Response_to_Sexual_Exploitation_V1.1_Jan_2017.pdf)

IASC Task Force on PSEA (2013): Challenges and options in improving recruitment processes in the context of Protection from Sexual Exploitation and Abuse (PSEA) by our own staff → <https://interagencystandingcommittee.org/accountability-affected-populations-including-protection-sexual-exploitation-and-abuse/documents-3>

Kindernothilfe: Child Protection Policy: Standards of Personnel Policy (in German) → [http://kindesschutz.venro.org/fileadmin/kindesschutz/downloads/personalbereich/KNH\\_Standards\\_Personalpolitik.pdf](http://kindesschutz.venro.org/fileadmin/kindesschutz/downloads/personalbereich/KNH_Standards_Personalpolitik.pdf)

Oxfam: PSEA Country Office Toolkit → <http://thewww.pseataaskforce.org/uploads/tools/1357303225.zip>

World Vision: Code of Conduct Guidelines → <https://www.wvi.org/publications/world-vision-partnership-policies/code-conduct-guidelines-policy>

## PSEA with partner organizations

IASC AAP/PSEA Task Force: Examples of PSEA language in contractual agreements → <https://www.chsalliance.org/get-support/resource/1249/>

Oxfam (2012): Non-Staff Code of Conduct – Oxfam → <https://oxfamapps.org/festivals/assets/pdfs/OI%20Code%20of%20Conduct%20Non%20Staff%20November%202017.pdf>

World Vision (2016): Guidance Note: Application of Child Protection Standards to Staff and Sub-Contractors of Contracted Individuals or Companies

→ <https://www.chsalliance.org/get-support/resource/1249/>

## Guidelines and policies

CARE: Policy on Protection from Sexual Exploitation and Abuse and Child Protection

English:

→ [https://www.care-international.org/files/files/Protection-from-Sexual-Exploitation-and-Abuse-and-Child-Protection\\_CARE-International-Policy\\_1-July-2017.pdf](https://www.care-international.org/files/files/Protection-from-Sexual-Exploitation-and-Abuse-and-Child-Protection_CARE-International-Policy_1-July-2017.pdf)

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→ [https://venro.org/fileadmin/user\\_upload/Dateien/Daten/Publikationen/VENRO-Dokumente/Kodex\\_Kinderrechte\\_2Auflage\\_v01.pdf](https://venro.org/fileadmin/user_upload/Dateien/Daten/Publikationen/VENRO-Dokumente/Kodex_Kinderrechte_2Auflage_v01.pdf)

**English:**

→ [https://venro.org/fileadmin/user\\_upload/Dateien/Daten/Publikationen/VENRO-Dokumente/VENRO\\_Code\\_of\\_Conduct\\_Child\\_Rights.pdf](https://venro.org/fileadmin/user_upload/Dateien/Daten/Publikationen/VENRO-Dokumente/VENRO_Code_of_Conduct_Child_Rights.pdf)

**VENRO (2018): VENRO Code of Conduct Transparency, Organisational Management and Monitoring (in German)** → [https://venro.org/fileadmin/user\\_upload/Dateien/Daten/Publikationen/VENRO-Dokumente/Kodex\\_Transparenz\\_3Aufl\\_v03.pdf](https://venro.org/fileadmin/user_upload/Dateien/Daten/Publikationen/VENRO-Dokumente/Kodex_Transparenz_3Aufl_v03.pdf)**Risk analysis**

United Nations (2009): Preventing Sexual Exploitation and Abuse. UN Agency and Cluster/Sector Checklist – Indonesia → <http://www.pseataaskforce.org/uploads/tools/1351623902.pdf>

United Nations (2018): Sexual exploitation and abuse risk management toolkit → [https://conduct.unmissions.org/sites/default/files/dpko-dfs\\_sea\\_risk\\_toolkit\\_28\\_june\\_2018\\_modified.pdf](https://conduct.unmissions.org/sites/default/files/dpko-dfs_sea_risk_toolkit_28_june_2018_modified.pdf)

Oxfam Australia (2017): Child Safeguarding Toolkit: A Practical Guide to support the implementation of the Oxfam Australia Child Safeguarding Policy → [https://acfid.asn.au/sites/site.acfid/files/resource\\_document/Oxfam\\_Child\\_Safeguarding\\_Toolkit\\_Full.pdf](https://acfid.asn.au/sites/site.acfid/files/resource_document/Oxfam_Child_Safeguarding_Toolkit_Full.pdf)

**Awareness raising and training**

CHS Alliance: Approved Trainers Scheme → <https://www.chsalliance.org/approved-training-scheme/>

Disasterready: Training → [disasterready.org](https://disasterready.org)

ECPAT Deutschland, Arbeitsgemeinschaft evangelische Jugend (AEG), VENRO (2012): Concrete Steps for Active Child Protection – Training Materials for Organisations in International Development and Humanitarian Aid (in German) → [https://venro.org/fileadmin/user\\_upload/Dateien/Daten/Publikationen/Sonstige/120323TM-ecpat.pdf](https://venro.org/fileadmin/user_upload/Dateien/Daten/Publikationen/Sonstige/120323TM-ecpat.pdf)

**InterAction: Webinars and Online Training on SEA**

→ <https://www.interaction.org/courses/sea101/>

→ <https://www.interaction.org/training/>

Kaya: Humanitarian Leadership Academy → <https://kayaconnect.org/course/info.php?id=1212>

**Kindernothilfe: Training programme**

→ [https://www.kindernothilfe.org/training\\_consulting.html](https://www.kindernothilfe.org/training_consulting.html)

Oxfam: Pick Up and Go Training Pack: Preventing Sexual Abuse and Exploitation: A Training Course for Managers and a Training Pack for Non-Management Staf → [http://www.pseataaskforce.org/uploads/tools/pickupaandgotrainingpackpreventingseaatrainingcourseformanagersandatrainingspackfornonmanagementstaffoxfamgb\\_english.zip](http://www.pseataaskforce.org/uploads/tools/pickupaandgotrainingpackpreventingseaatrainingcourseformanagersandatrainingspackfornonmanagementstaffoxfamgb_english.zip)



UN Peacekeeping Resource Hub: Online Training

→ <http://dag.un.org/handle/11176/90529>

## Other

*educo/Plan International/Save the Children/War Child/World Vision (2015): Interagency Study on Child-Friendly Feedback and Complaint Mechanisms within NGO programmes* → <https://resourcecentre.savethechildren.net/library/interagency-study-child-friendly-feedback-and-complaint-mechanisms-within-ngo-programmes>

*The Redress Trust (2017): Sexual Exploitation and Abuse in Peacekeeping Operations – Improving Victims’ Access to Reparation, Support and Assistance* → <https://redress.org/publication/sexual-exploitation-and-abuse-in-peacekeeping-operations/>

*Save The Children UK (2008): No One To Turn To – The under-reporting of child sexual exploitation and abuse by aid workers and peacekeepers* → [https://resourcecentre.savethechildren.net/sites/default/files/documents/no\\_one\\_to\\_turn\\_to\\_1.pdf](https://resourcecentre.savethechildren.net/sites/default/files/documents/no_one_to_turn_to_1.pdf)

## Glossary

### AAP

Accountability to Affected Populations

### BOND

British Overseas NGOs for Development

### BZRG

German Act on the Central Criminal Register and the Educative Measures Register (Bundeszentralregistergesetz)

### CBM

Christoffel-Blindenmission (German NGO)

### CHS

Core Humanitarian Standard on Quality and Accountability

### GBV

Gender-based violence

### IASC

Inter-Agency Standing Committee, is the primary mechanism for inter-agency coordination of humanitarian assistance, involving the key UN and non-UN humanitarian partners.

### ICRC

International Committee of the Red Cross

### IOM

International Organization for Migration

### MOS

Minimum operating standards

### NGO

Non-governmental organization

### PSEA

Protection from Sexual Exploitation and Abuse

### SEA

Sexual exploitation and abuse, used in the context of international development and humanitarian aid

### StGB

German criminal code (Strafgesetzbuch)

### UN

United Nations

### UNHCR

United Nations High Commissioner for Refugees

### VENRO

German for Verband Entwicklungspolitik und Humanitäre Hilfe deutscher Nichtregierungsorganisationen is the umbrella organization of development and humanitarian aid NGOs in Germany.

## VENRO members

- action medeor
- ADRA Deutschland
- AGIAMONDO
- Aktion Canchanabury
- AMICA e.V.
- ANDHERI-HILFE e.V.
- Apotheker helfen e.V.
- Apotheker ohne Grenzen e.V.
- Arbeiter-Samariter-Bund Deutschland
- Arbeitsgemeinschaft der Eine-Welt-Landesnetzwerke in Deutschland (agl)
- Arbeitsgemeinschaft Entwicklungsethnologie
- arche noVa
- Ärzte der Welt
- ASW – Aktionsgemeinschaft Solidarische Welt
- AT-Verband
- AWO International
- Behinderung und Entwicklungszusammenarbeit (bezev)
- BONO-Direkthilfe
- BORDA e.V.
- Brot für die Welt – Evangelischer Entwicklungsdienst
- Bund der Deutschen Katholischen Jugend (BD-KJ)
- Bundesvereinigung Lebenshilfe
- CARE Deutschland e.V.
- Caritas International
- Casa Alianza - Kinderhilfe Guatemala
- CHANGE e.V.
- ChildFund Deutschland
- Christliche Initiative Romero
- Christoffel-Blindenmission Deutschland
- Dachverband Entwicklungspolitik Baden-Württemberg (DEAB)
- Das Hunger Projekt
- DED-Freundeskreis
- Deutsche Entwicklungshilfe für soziales Wohnungs- und Siedlungswesen (DESWOS)
- Deutsche Kommission Justitia et Pax
- Deutsche Lepra- und Tuberkulosehilfe (DAHW)
- Deutsche Stiftung Weltbevölkerung (DSW)
- Deutscher Paritätischer Wohlfahrtsverband
- Deutsches Komitee Katastrophenvorsorge Deutsch-Syrischer Verein e.V. (DSV)
- DGB-Bildungswerk BUND – Nord-Süd-Netz
- Difäm – Deutsches Institut für Ärztliche Mission
- Don Bosco Mondo
- DVV International – Institut für Internationale Zusammenarbeit des Deutschen Volkshochschul-Verbandes
- Eine Welt Netz NRW
- EIRENE – Internationaler Christlicher Friedensdienst
- EMA – Euro-Mediterranean Association for Cooperation and Development
- EPIZ – Entwicklungspolitisches Bildungszentrum Berlin
- Erlassjahr.de – Entwicklung braucht Entschuldung
- Evangelische Akademien in Deutschland (EAD)
- Fairventures Worldwide
- FIAN Deutschland
- Forum Fairer Handel
- FUTURO SI
- Gemeinschaft Sant'Egidio
- German Doctors
- German Toilet Organisation
- Germanwatch
- Habitat for Humanity Deutschland
- Handicap International
- Help – Hilfe zur Selbsthilfe
- HelpAge Deutschland
- Hilfe für Afrika e.V.\*
- Hoffnungszeichen / Sign of Hope
- humedica
- Indienhilfe
- INKOTA-netzwerk
- Internationaler Bund (IB)
- Internationaler Hilfsfonds
- International Justice Mission Deutschland
- Internationaler Ländlicher Entwicklungsdienst (ILD)
- Internationaler Verband Westfälischer Kinderdörfer
- Islamic Relief Deutschland
- JAM Deutschland
- Jambo Bukoba
- Johanniter-Auslandshilfe
- KAIROS Europa
- Karl Kübel Stiftung für Kind und Familie
- KATE – Kontaktstelle für Umwelt und Entwicklung
- Kinderhilfswerk Stiftung Global-Care\*
- Kindernothilfe
- Kinderrechte Afrika
- KOLPING International Cooperation e.V.
- Lateinamerika-Zentrum
- Lesben- und Schwulenverband (LSVD)\*
- Lichtbrücke
- Malteser International
- Marie-Schlei-Verein
- matterna – Stiftung Frau und Gesundheit
- medica mondiale
- medico international
- MISEREOR
- Mission East Deutschland e.V.\*
- Missionsärztliches Institut Würzburg
- NETZ Bangladesch
- Neuapostolische Kirche-karitativ e.V.
- nph Kinderhilfe Lateinamerika e.V.\*
- Ökumenische Initiative Eine Welt
- OIKOS EINE WELT
- Opportunity International Deutschland
- Ora International Deutschland
- OroVerde – Die Tropenwaldstiftung
- Oxfam Deutschland
- Plan International Deutschland
- Rhein-Donau-Stiftung
- SALEM International
- Samhathi – Hilfe für Indien
- Save the Children Deutschland
- Senegalhilfe-Verein
- Senior Experten Service (SES)
- Society for International Development Chapter Bonn (SID)
- SODI – Solidaritätsdienst International
- SOS-Kinderdörfer weltweit\*
- Stiftung der Deutschen Lions
- Stiftung Entwicklung und Frieden (SEF)
- Stiftung Kinderzukunft
- Stiftung Nord-Süd-Brücken
- SÜDWIND – Institut für Ökonomie und Ökumene
- Susila Dharma – Soziale Dienste
- Tearfund Deutschland e.V.\*
- Terra Tech Förderprojekte
- TERRE DES FEMMES
- terre des hommes Deutschland
- Tierärzte ohne Grenzen
- TransFair
- Verband Entwicklungspolitik Niedersachsen (VEN)
- Verbund Entwicklungspolitischer Nichtregierungsorganisationen Brandenburgs (VENROB)
- W. P. Schmitz-Stiftung
- WEED – Weltwirtschaft, Ökologie & Entwicklung
- Weltfriedensdienst
- Weltgebetstag der Frauen – Deutsches Komitee
- Welthaus Bielefeld
- Welthungerhilfe
- Weltladen-Dachverband
- Weltnotwerk der KAB Deutschlands
- Werkhof Darmstadt
- Werkstatt Ökonomie
- World University Service
- World Vision Deutschland
- Zukunftsstiftung Entwicklung bei der GLS Treuhand

\* Guest member

VENRO currently has 139 members.  
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**VENRO** is the umbrella organisation of development and humanitarian non-governmental organisations (NGOs) in Germany. The association was founded in 1995 and currently has more than 130 member organisations. Their backgrounds lie in independent and church-related development co-operation, humanitarian aid as well as development education, public relations and advocacy.

VENRO's core objective is to strive to make globalisation more equitable, in particular through the eradication of global poverty. The association is committed to upholding human rights and to the preservation of natural resources.

**VENRO**

- represents the interests of development policy and humanitarian NGOs vis-à-vis policymakers
- strengthens the role of NGOs and civil society in development co-operation and humanitarian aid
- engages in advocacy for the interests of developing countries and poorer segments of society
- raises public awareness of development policy and humanitarian issues

**VENRO** – Verband Entwicklungspolitik und Humanitäre Hilfe  
deutscher Nichtregierungsorganisationen

[www.venro.org](http://www.venro.org)