

# Independent review of UNDP, UNFPA and UNOPS policies and procedures to tackle sexual exploitation and abuse (SEA) and sexual harassment (SH)

## Final report

15 March 2019, Copenhagen

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# 1 Executive summary

From 5 February 2019 to 15 March 2019, Deloitte assisted UNDP, UNFPA and UNOPS in performing a joint review of the three organizations' policies and procedures for managing Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH). The review included a desktop review of selected relevant existing policies and procedures to gain an understanding of the status quo of the SEA and SH practices in the respective organizations (please refer to appendix 6.1 for an overview of the documents reviewed). With this knowledge as foundation, interviews were conducted with 40 key stakeholders from across the three organizations at both corporate, regional and country level (please refer to appendix 6.2 for an overview of the interviewees). Based on the input from the document review and the interviews, an initial assessment of the respective SEA and SH setups was conducted to provide each organization with a set of observations and recommendations.

Based on the review, the following overall recommendations were developed:

1. Continue the communication from top-level
2. Policies and procedures should be clear, accessible and easy to understand
3. Show accountability
4. Training targeted to specific needs
5. Accountability with implementing partners
6. Suitable mix of reporting channels
7. Following the experience with the "network of peers"
8. Considering the investigations capacity
9. Ensuring ongoing information to the parties involved
10. Clarifying the assistance setup
11. Focusing on restorative measures
12. Prioritizing next steps

The results of the review are presented in this report with sections covering observations and recommendations for each organization respectively as well as a set of general observations and general recommendations cross-cutting the three organizations.

## 2 Introduction

### 2.1 Scope

In light of the last year's media attention caused by the 'me too movement' and the unearthing of several incriminating cases of sexual exploitation and abuse within the NGO sector, stakeholders have increasingly turned their attention to how the United Nations (UN) is handling Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH). Violation of human rights, such as SEA and SH, is against UN's mandate, core values and integrity. Thus, the joint Executive Board of UNDP, UNFPA and UNOPS has requested the management of the respective organizations to undertake an independent, victim-centered review of existing policies and procedures on tackling SEA and SH, in order to examine the adequacy of the setup as well as to contribute to accountability, learning and adaptation of responses to PSEA and SH.

In accordance with the agreed Terms of Reference, the joint review is conducted within a focused timeframe of 5 weeks (from 5 February to 15 March 2019). It is not a comprehensive review of practices across UNDP, UNFPA and UNOPS, but rather an "as is" assessment of the status of the SEA and SH prevention and response setup with a focus on the current policies and procedures in place, and to what extent they are perceived by interviewees as fit for purpose, implemented and practiced in a suitable manner. Likewise, our distinction between SEA and SH in the review, is done to the extent that the documents reviewed and the interviews conducted have made it possible. With this backdrop, the assessment will work to identify steps forward to reinforce a coherent response to SEA and SH.

The Executive Board has requested UNDP, UNFPA and UNOPS to present a report containing the results of the joint review and associated management responses to the Executive Board at its annual session on 30 May 2019.

### 2.2 Methodology

An initial desktop review of UNDP, UNFPA and UNOPS' existing documents relating to prevention of and response to SEA and SH was conducted, including: selected relevant policies and procedures, communication and outreach, training materials and action plans. For a full overview of the documents reviewed, please see appendix 6.1. In addition, interviews have been conducted with 40 selected key stakeholders from across the UNDP, UNFPA and UNOPS organizations in order to learn more about how the policies and procedures are implemented within the respective organizations as well as to examine potential barriers to a successful PSEA and SH setup (please refer to appendix 6.2 to obtain a full overview of the interviewees). The output from the interviews was validated with the interview participants to ensure that observations and input were understood and presented correctly. The validation process has not, however, included fundamentally new information which will have to be added in the management response.

The Terms of Reference states that the scope of the review shall focus on<sup>1</sup>:

- *Review of existing policies, procedures and practices of UNDP, UNFPA, and UNOPS in consideration of evolving inter-agency initiatives, work-streams and best practices, including by the Chief Executive Board and its Task Force on Sexual Harassment; the Office of the Special Coordinator; the Inter-Agency Standing Committee; and the Office of the Victim Rights Advocate.*
- *Interviews with relevant personnel and stakeholders as designated by each organization.*

The findings of this report thus reflect the observations captured in the conducted interviews and the document review performed by Deloitte. As such, the statements and observations uttered in the interviews have not been further tested through e.g. field visits or audit work.

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<sup>1</sup> [www.undp.org/content/dam/undp/library/corporate/Executive%20Board/2019/First-regular-session/dp2019-2e.pdf](http://www.undp.org/content/dam/undp/library/corporate/Executive%20Board/2019/First-regular-session/dp2019-2e.pdf).

## 2.3 Key definitions

It is important to note that within the UN system there is a clear distinction between sexual exploitation and abuse (SEA) and sexual harassment (SH).

**Sexual exploitation** is defined by the UN as any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. As such, sexual exploitation is a broad term, which includes a number of acts described below, including transactional sex, solicitation of transactional sex and exploitative relationship.

**Sexual abuse** is defined as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. All sexual activity with a child is considered as sexual abuse. Physical intrusion is understood to mean sexual activity. Sexual abuse is a broad term, which includes a number of acts described below, including rape, sexual assault, sex with a minor, and sexual activity with a minor under the age of 18<sup>2</sup>.

Sexual exploitation and abuse (SEA) is within the UN system understood as an assault (actual or attempted) against beneficiaries or other third parties in the local community.

**Sexual harassment (SH)** is by the UN defined in the "UN System Model Policy on Sexual Harassment" as any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. Sexual harassment may occur in the workplace or in connection with work. While typically involving a pattern of conduct, sexual harassment may take the form of a single incident. In assessing the reasonableness of expectations or perceptions, the perspective of the person who is the target of the conduct shall be considered<sup>3</sup>. Beyond UN regulations, the definition of sexual harassment is broader and does not require a link to the work environment.

In connection to SH, the UN System Model Policy on Sexual Harassment provides the following examples<sup>4</sup>:

- Attempted or actual sexual assault, including rape
- Sharing or displaying sexually inappropriate images or videos in any format;
- Sending sexually suggestive communications in any format
- Sharing sexual or lewd anecdotes or jokes
- Making inappropriate sexual gestures, such as pelvic thrusts
- Unwelcome touching, including pinching, patting, rubbing, or purposefully brushing up against another person
- Staring in a sexually suggestive manner
- Repeatedly asking a person for dates or asking for sex
- Rating a person's sexuality
- Making sexual comments about appearance, clothing, or body parts
- Name-calling or using slurs with a gender/sexual connotation
- Making derogatory or demeaning comments about someone's sexual orientation or gender identity.

**Victim-centered approach** means that the review will consider the perspective of the victim in assessing policies, procedures and practices in connection to prevention, reporting, investigations and assistance including regarding victims as rights-holders.

**Personnel** – For this report "personnel" will be used to cover UN staff members as well as interns, UN volunteers, service contractor holders, individual contractors/consultants, as well as persons engaged to provide services based on a reimbursable loan agreement and non-reimbursable loan agreement.

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<sup>2</sup> UN Glossary on Sexual Exploitation and Abuse, 2007

<sup>3</sup> UN System Model Policy on Sexual Harassment, 2018

<sup>4</sup> UN System Model Policy on Sexual Harassment, 2018

## **2.4 Deliverables**

The deliverable of the joint review of UNDP, UNFPA and UNOPS will be a short, to-the-point report covering the observations, conclusions and recommendations for managing SEA and SH within UNDP, UNFPA and UNOPS (See sections 4 and 5 of the report).

### **3 Elements of effective protection against sexual exploitation and abuse (PSEA) and sexual harassment (SH)**

Deloitte has used the prescribed UN standards for effective PSEA and SH to provide structure to the review as well as the organization's industry experience from within the field of PSEA and SH. Thus, the input obtained from the document review and the conducted interviews has been categorized in accordance with the following framework containing four elements for effective management of PSEA and SH; *Accountability & Governance; Prevention; Reporting & Investigations; and Assistance*. These four elements have provided the backdrop for the observations and recommendations presented in this report and will be further elaborated in this section.

#### **3.1 Accountability & Governance**

The "UN Secretary General's Bulletin on Sexual Exploitation and Sexual Abuse" (2013) and the "UN System Model Policy on Sexual Harassment" (2018) form, together with the SEA and SH inter-agency initiatives, the umbrella under which the coordination of SEA and SH takes place within the respective organizations. As such, UNDP, UNFPA and UNOPS are accountable in their own right, but also as part of the bigger UN work effort to mitigate the risk of SEA and SH occurring. Thus, ensuring a distinct governance structure with assigned roles and responsibilities for managing PSEA and SH, which emphasizes where accountability lies, is an essential building block for a solid PSEA and SH setup. Accountability should here be understood as referring both to the accountability of the individual member of the personnel, accountability at an organizational level and accountability at a wider UN-system level. Maintaining accountability entails a need for clear leadership that can ensure consistent and tailored communication on the SEA and SH issues in order to provide the organization with a sense of urgency on the matter as well as commitment from senior management. However, leadership is also reflected in the everyday operations performed by individual members of personnel across the organization. Thus, leadership should be closely linked to the organizational culture and the shared values that drive the individual's behavior.

As accountability covers both the organization's ability to prevent, act on and assist in incidents, it is also relevant to touch upon ensuring the appropriate authority and resources allocated in the various offices/teams to handle administrative tasks, as well as preventing and managing incident response. Furthermore, the level of transparency exercised within the respective organizations, in regard to communicating not only preventive actions but also actual case handling, is of essence in order to induce trust that policies are being enforced.

The review will focus on how the governance structure and accountability is made explicit and potentially exemplified in the policy framework. Additionally, the applicability of the framework itself will be reviewed including: 1) the amount of policies implemented within the respective organizations, 2) whether there is a clear document hierarchy in place, and 3) whether the policies are seen as enabling or disabling actions to prevent and respond to misconduct as well as assist in providing support and protection to victims.

#### **3.2 Prevention**

Maintaining and operating a strong prevention setup requires significant focus on ensuring clear leadership, personnel's overall awareness of policies, as well as ongoing training and communication. Multiple communication channels should be used to reach the different needs among the stakeholders in the organizations – both at a local and corporate level. Providing training in connection with the onboarding of new personnel as well as reoccurring training sessions should be a focus to ensure awareness among personnel.

Working with third parties, such as implementing partners, NGOs and local governments, will always pose a risk, as the organizations cannot exercise the same level of control as within their own operations. Thus,

a risk-based approach to third parties might be a valuable instrument to help screen and prioritize, where the more high-risk projects/locations are and to guide the development of mitigating activities.

### **3.3 Reporting & Investigations**

Implementation of trust-worthy reporting mechanisms is a key element in ensuring a safe space for victims to report misconduct. In connection to this, there is a variety of aspects to take into account: the *availability* of reporting channels as well as the *awareness* of them internally in the organization and externally in the local communities where the UN operates are topics to consider, as are the local *applicability* of the reporting mechanisms, including elements such as language adaptations, easy access and format. In this relation, it is important to note that victims of SEA are external, non-UN individuals, e.g. beneficiaries. This can create some difficulties in ensuring communication with them once a report of allegations has been submitted and an investigation has been opened, as they often cannot provide a contact address or do not have access to technology.

With a victim-centered approach, focus should be on upholding the highest standard of *confidentiality* for the people coming forward and reporting allegations. Thus, providing the victim with a selection of reporting alternatives, such as anonymous reporting, informal/formal options for resolution in SH cases and formal resolution for SEA cases, enables the victim to seek the solution most fit for the individual's preferences.

To ensure an incentive to report, *action* is also of essence, wherefore the investigation of allegations of SEA or SH needs to be conducted with a focus on both timeliness, due process and ensuring that complaints are acted upon. The personnel of offices/teams that receive reports of incidents in either area needs to have appropriate training and specialized skills in order to perform their tasks. Lastly, the measures in place to ensure that the individual is protected against unfair treatment and *retaliation* are crucial.

Underlining all these mechanisms and activities should be a strong organization-wide culture, permeated by trust and with a focus on ensuring the respect and integrity of the organization's mandate. However, in this equation, it is impossible to leave out an individual's local culture and the implications that this has on behavior. Reporting measures should therefore meet the local needs in terms of providing reporting options tailored to cultural norms, rather than be designed with a focus on the needs of the corporate level at the organization's headquarters. This is especially relevant to consider in relation to allegations of SEA, as the victims in these cases are not UN personnel and thus might not have the same access to technology or understanding of their options for reporting and assistance.

### **3.4 Assistance**

Providing a thorough net of support mechanisms is instrumental to the successful implementation of PSEA and SH. This entails a focus on setting up short-term and long-term support and protection measures for the victim. The support mechanisms should also be adaptable to the level of severity of the misconduct in order to cater to victims of different kinds of misconduct within SH and SEA.

The level of transparency, in terms of the support mechanisms available and their local applicability, is an essential element of a strong assistance setup. Furthermore, aligning assistance activities across the UN might be useful to ensure coordination, coherence and consistency of the support provided on a UN-wide basis. This is particularly relevant when dealing with SEA cases, as these are considered to happen within the communities where the UN organization operates, e.g. between a party from the UN organization and an external party, e.g. beneficiary, local community member, local government, NGO, or between a UN implementing partner and a beneficiary (for the full definition of SEA, please refer to page 5 of this report). In these settings, coordinating the assistance effort across UN organizations would be valuable to provide a structured and transparent approach to managing capacities and to avoid duplication of work in terms of finding individual solutions for the respective organizations.

## 4 Observations

This chapter will encompass a consolidated presentation of the identified observations per organization as well as a section covering general observations across UNDP, UNFPA and UNOPS in relation to PSEA and SH respectively.

### 4.1 UNDP

The following section will present the main observations regarding UNDP's current policies and procedures. The observations will be categorized in accordance with the framework for effective management of PSEA and SH; *Accountability & Governance*; *Prevention*; *Reporting & Investigations*; and *Assistance* (which is further described in chapter 3).

#### 4.1.1 Accountability & Governance

##### **Policies**

The UN Staff Regulations and Rules include key provisions on SEA and SH. In addition to this, UNDP's work on SEA is governed by the Secretary General's Bulletin "*Special measures for protection from sexual exploitation and sexual abuse*" (ST/SGB/2003/13). The organization's work on SH is governed by the "*Policy on Harassment, Sexual Harassment, Discrimination and Abuse of Authority*". Together with the "*Policy for protection against retaliation*", which was implemented in 2008 and updated in 2018, these policies guide the SEA and SH efforts of the organization.

Providing a more general basis and context for these policies are a number of procedures and guidelines, such as "*OAI Investigations Guidelines*" (2010), "*UNDP Code of Ethics*" (2017), "*UNDP Legal Framework for Addressing Non-compliance with UN Standards of Conduct*" and "*Where to go when - A Resource Guide for UNDP Personnel*" (2017). It should be noted that some of these documents are to be used by specialist units, such as the Office of Audit and Investigations (OAI) and the Legal Office, and are thus not targeted at general personnel. As such, the nature and complexity of some of these documents might be somewhat difficult for personnel to comprehend and thus there is a need for ensuring that communication to the broader organizational audience is targeted and simplified for instance through the availability of short versions of policies and procedures with graphics.

##### **Roles and responsibilities**

*Tone at the top* – On an annual basis, the directors of UNDP's different HQs, country and regional offices are asked by the Administrator to certify that adequate action has been taken in their respective teams to ensure effective prevention of SEA and SH. In addition to this, the Administrator himself, in the annual management letter, declares the continued commitment to the SEA and SH efforts, including UNDP's focus to work to ensure compliance with internal procedures for SEA and SH as well as the focus on ensuring that all SEA and SH incidents have been reported through the appropriate channels. In addition to this, the Administrator also provides communication on SEA and SH at Executive Board sessions, town halls with personnel and through ongoing messages to personnel. These activities have been supplemented by messages by directors to their managers and personnel. These communication initiatives showcase the clear commitment from the top to the SEA and SH efforts, while also ensuring that accountability is placed at both a corporate and local level across the organization.

*PSEA Senior Focal Point* – UNDP has appointed a designated PSEA Senior Focal Point, who represents UNDP in inter-agency work on SEA and who ensures that UNDP contributes to and aligns its work on PSEA with the work of the UN system.

*Internal task force on SEA and SH* – In January 2018, the Administrator set up a task force on the prevention and response to SH, driving forward the required cultural change within UNDP. Later on, the scope of the SH task force was expanded to also include SEA. The SEA and SH task force operates as a cross-organizational group with participants from the Legal Office, Office of Audit & Investigations, Gender

Team, Office of Human Resources, Ethics Office, Communications, the Ombudsman's Office, Security, and Regional Representatives as well as the Staff council. The SEA and SH task force focuses on ensuring a clear tone at the top, authority and accountability, as well as concrete action in multiple areas as part of a holistic response strategy. As such, the SEA and SH task force has been leading a comprehensive outreach campaign to raise awareness among personnel across the organization, including in countries, where SEA and SH are sensitive topics. The SEA and SH task force also worked with management with a view to generating commitment, so that all managers have an understanding of their responsibility and have an action plan available.

*Office of Human Resources (OHR)* – Representatives from OHR are part of different inter-agency working mechanisms on SEA and SH as well as the internal task force on SEA and SH within UNDP. In terms of UNDP's response to SEA and SH, OHR's tasks include: leading the development and revisions, as needed of the "Policy on Harassment, Sexual Harassment, Disconfirmation, and Abuse of Authority"; coordinating mandatory trainings on SEA and SH; coordinating across units and responding to queries and questions from personnel raised to the Harassment Focal Point, a function hosted by OHR; as well as coordinating support to victims. When recruiting new hires, OHR sets standards for and, as relevant, performs an overall screening of the candidates as part of the application process. Here, there are specific questions requiring applicants to disclose their previous involvement in SEA and/or SH. As these questions are posed as part of an application form, the screening is based on self-reporting. To complement it, and as part of an inter-agency effort, UNDP will be vetting candidates against the Clear Check Database when this has been fully implemented.

*Office of Audit & Investigations (OAI)* – The role of OAI is to investigate allegations of misconduct, including SEA and SH related cases, and OAI is the principal channel to report these allegations to. Furthermore, when time permit and depending on the availability of resources, OAI may conduct training of personnel in various UNDP Country Offices and will in these sessions address SEA and SH related issues. Besides this, OAI handles policy planning, engages in different internal task forces, plans investigations and composes general casework in accordance with UNDP policies and procedures. In addition to these day-to-day tasks, OAI is also involved in various internal and inter-agency initiatives related to SEA and SH, including providing input to the rewriting of the contract for implementing partners, together with UNDP's Legal Office and OHR, to ensure a more clear language in terms of SEA and SH. OAI is also working on the implementation of the UN wide Clear Check Database together with the Legal Office and OHR.

*Legal Office* – The Legal Office within UNDP consists of two practice groups: *The Administrative Law Practice (AL team)*, who handles all legal matters arising in the administration and management of UNDP staff members, including cases of staff misconduct, such as SEA and SH, and *the Corporate and Institutional Law Practice (C&I team)*, who handles all legal issues of the Organization with the exception of those relating to staff. As such, the AL team is responsible for reviewing investigation reports and examining the evidence; ensuring due process; formulating charges of misconduct; and recommending to senior management disciplinary sanctions and/or any other appropriate action. The C&I team is responsible for reviewing investigation reports and providing advice on contractual action (based on the contract between UNDP and the contractor) that may be taken against a non-staff contractor who is found to have engaged in SEA or SH. Due to the increasing workload, the Legal Office has in 2018 increased its capacity with two additional personnel members.

*Ethics Office* – The Ethics Office is an independent office bound by confidentiality. A part of the Ethics Office's mandate is to work on the standard setting and policy development, as well as to ensure protection against retaliation. This entails that the Ethics Office works with management as well as personnel, providing guidance and conducting targeted trainings for UNDP personnel on ethics, including SEA and SH. The Ethics Office does not receive reports in relation to SEA and SH. Instead, the Ethics Office provides personnel with a safe space to voice concerns, discuss options available to victims who seek guidance and directs potential victims elsewhere for reporting the cases (i.e. OAI, the Ombudsman's Office or OHR).

*Ombudsman's Office* – The Ombudsman Office is an informal grievance mechanism established to provide ombudsman and mediation services to UNDP, UNFPA, UNICEF, UNOPS and UN Women. The role of the

Office of the Ombudsman is to help address through informal means grievances that are brought its attention. Victims and perpetrators of SH can contact the Ombudsman's Office for confidential assistance and guidance on options available to them. The Ombudsman's Office helps prevent escalation of behavior that could become sexual harassment also through training on workplace conflict management themes such as challenging conversations, civility in the workplace and communication at work. The Ombudsman's Office has a representative in the SEA and SH task force in UNDP.

*Managers and supervisors* – Managers and supervisors are responsible for creating and maintaining a safe working environment across UNDP, with a focus on ensuring that personnel are confident in and aware of the internal procedures for preventing and responding to SEA and SH. Managers and supervisors must furthermore provide personnel with a safe space for voicing concerns and reporting allegations of SH or SEA, which they are then obliged to submit to OAI for further assessment and investigation or to OHR, the Ethics Office or the Ombudsman's Office for further guidance on appropriate steps.

#### **4.1.2 Prevention**

##### ***Training, communication and outreach***

Over the last 1.5 years, UNDP has intensified efforts within SEA and SH with a focus on increasing the awareness of the issues internally. This has entailed an increased focus on providing the organization with ongoing messages from the Administrator, sessions at all major regional and global management meetings, setting up a dedicated QA email address, posters and pocket cards about the SH and SEA setup, development of guidelines and tools as well as a focus on communicating the availability of reporting mechanisms.

To ensure that personnel and partners can navigate easily different resources related to SEA and SH, including reporting and support, UNDP has launched internal and external websites for SEA, as well as an internal website for SH. The external website for SEA features an overview of the main content of the policies in a short and easily understood language. Furthermore, it features short explanations of various measures in place, including training and reporting. There is a guide on how to report SEA cases with links, mail and phone information, etc. The internal website on SH, which is implemented in 5 languages, has been an important part of communicating to personnel as well as to provide personnel with a platform, where they can find supporting materials, videos, FAQs and so forth.

Mandatory training courses on SEA and SH are provided to personnel online. As of the end of 2018, approximately 90% of all UNDP staff completed the training according to an internal check by the OHR. When personnel are going on missions in the field they are provided with specific training on SEA and SH. Moreover, there are additional training modules for managers on SEA and SH as it is their responsibility to act as role models as well as to lead effective prevention and response in UNDP's daily operations. In the current setup, there is no follow-up training for general personnel, but it is expected to be introduced in the future. Even with this effort, some interviewees have pointed to the fact that there might still be some confusion in terms of understanding and distinguishing between SEA and SH. Therefore, one might argue that it is important to provide even more training to general personnel on these issues, potentially with a focus on face-to-face presentations (including virtually) rather than online training modules, as this might have a greater impact on the participants. UNDP has stated that the plan for 2019 is to focus training and other prevention measures in 10-20 offices based on a risk-based categorization of potentially high-risk locations.

Lastly, it might be relevant to note, that a group of new country office leaders – UNDP Resident Representatives – has recently been appointed and is starting its new assignments. Thus, there might be a risk that some of the new country office leaders will become overwhelmed with all the different tasks at hand, not only related to SEA and SH, which may result in a failed effort on the prevention of SEA and SH. To mitigate this risk, the SEA and SH task force is organizing separate webinars for the new leaders to ensure that they are aware of their responsibilities in the prevention of and response to SEA and SH.

##### ***Action plans***

The SEA and SH task force within UNDP has initiated that all bureaus, HQs, regional and country offices must develop action plans for how they intend to manage SEA and SH within their given

region/country/office. The task force thus provided an action plan template and guidance on what could potentially go into the plan. The objective of this initiative has been to place accountability with the local offices, hereby ensuring that the ongoing stated commitment will be carried out into concrete actions.

The aim is that this will enable a stronger ownership of the activities at a local level, ensuring that UNDP is not just talking about managing SEA and SH, but that the organization is also “walking the talk”. As the action plans are fairly new, it is too soon to know the impact. However, the feedback from some entities and country offices has been that the process itself with having to develop a country action plan meant that the office discussed and engaged in these sensitive and sometimes taboo themes, which they otherwise would not have discussed in the office. In that way, the action plans have enabled a more open discussion and contributed to enabling the desired cultural change.

### ***Implementing partners***

Setting up procedures to manage third party risks among implementing partners and to ensure adequate safeguards to mitigate SEA has been a focus across the UN system for the past years. This has among other inter-agency activities entailed the launch of a UN Supplier Code of Conduct, which includes wording on SEA as well as an IP Protocol, which provides guidance on managing implementing partners in relation to SEA issues. To ensure that the collaboration with an implementing partner is assessed prior to engagement start, UNDP has developed an implementing partner assessment tool. The scope of the assessment tool covers many elements and in 2018, UNDP added questions related to SH and SEA, in order to make sure that respective risks are properly identified. If the implementing partner does not meet the requirements for SEA and SH prevention and response, it is flagged as a risk, which needs to be further assessed and managed.

In addition to this, UNDP is currently in the process of finalizing the text regarding implementing partners' obligation to comply with UNDP's requirements in relation to PSEA and SH. This text will be added to UNDP's project document template, in order to ensure that implementing partners are aware of and comply with these requirements. One should note that approximately 80% of UNDP's implementing partners are either government institutions, who may define SEA (and thus investigate/prosecute it) differently than the UN system does. Other implementing partners are local NGOs that can have limited resources and, as a consequence, might not have a thorough PSEA setup and ability with respect to PSEA and investigation requirements. In these cases, UNDP will need to monitor the situation closely and manage relevant risks accordingly.

## **4.1.3 Reporting & Investigations**

### ***Reporting mechanisms***

Within UNDP, reporting of SEA and SH can be submitted through a number of reporting mechanisms, such as the personnel's immediate supervisor and the OAI. Besides these channels, all personnel may contact the Ombudsman's Office, the Ethics Office, OHR and peers and staff council for guidance in the matters. UNDP allows anonymous reporting and no expiration date for the ability to report SH and SEA allegations. Providing personnel with the option to report anonymously is of course in line with the victim-centered approach. However, this might cause some difficulties in terms of the OAI's ability to investigate the case, if the victim is not identifiable or wishes to contribute to the investigation.

Besides this, SH allegations can be reported through an independent, externally operated helpline, which was implemented in September 2018. The helpline is administered by a third party vendor, Expolink. The helpline operates in the main six UN languages; Russian, Chinese, French, Spanish, English, and Arabic, with translation into multiple other languages being available on an on-demand basis. The objective of the helpline has been to provide a safe space, where a caller can share his/her experience, receive information on available support options and formally report SH.

As a starting-point, having different options for reporting is a good thing, since the individual can have different preferences and technical possibilities. On the other hand, it can be difficult to navigate in the variety of reporting channels.

In the advisory role on SH cases, OHR, the Ethics Office and the Ombudsman's Office try to have conversations with personnel as soon as possible, to provide a safe space to voice concerns and determine the best way to address the issue. The UNDP global staff survey (GSS) showed that the supervisor is the predominant channel to report overall misconduct. Thus, one might argue that there is a need to ensure that immediate managers and supervisors are equipped and aware of the procedures for reporting (i.e. where to report what).

### ***Investigations***

In the UNDP setup, it has been agreed that all allegations of SEA incidents should be forwarded directly to OAI upon receipt. When OAI receives a report on SEA or SH allegations, the case will go through an initial review to assess the scope of the allegations and potential legal implications. UNDP has decided to give priority to these cases and has established a 6 month's timeframe for case handling, which entails that all SEA and SH investigation activities – from receipt of the initial report to the finalized investigatory conclusion – must be terminated within the given 6 month's timeframe. It can be fairly difficult to conduct these investigations as it may be a "he said/she said" case and thus the evidence might not be palpable. One might argue that it in these cases it is particularly important to communicate transparently why a decision is made to not go forward with a case. As SEA and SH incidents are only part of OAI's work, the priority given to these cases puts pressure on the limited resources available within the team. To mitigate this, OAI has in 2018 hired a dedicated investigator specialized in SH and SEA.

The focus on SH and SEA also triggers the need for continuous training of investigation officers in order for them to be able to handle the cases and not least the victims, witnesses and alleged perpetrators involved in the right manner. Historically, it has been difficult for investigators at times to fully understand the difference between SEA and SH cases. Since SEA and SH incidents are very sensitive cases and the victims are more vulnerable than e.g. in a fraud case, it is an important step that the investigations team has chosen to have one resource dedicated to each case, so that there is a primary point of contact throughout the investigations.

#### **4.1.4 Assistance**

##### ***Support mechanisms***

Within UNDP, assistance and guidance to victims are provided through the Ethics Office, OHR and the Ombudsman's Office. To provide stress counselling, UNDP has access to UN Critical Incident Stress Management (CISMU) counsellors, who are located across the globe and can provide face-to-face counselling. Furthermore, UNDP has engaged an external service provider, the Rome Institute, to deliver counselling support to victims of SH. The Rome Institute services are virtual, i.e. provided by Skype or phone. One might consider whether such a service provider will be able to successfully fulfil the SH victim's need for counselling. As of now, there is little evidence confirming either way. As such, it might be argued that this platform cannot stand alone – it needs to still be supported by the face-to-face interaction and guidance provided by OHR, the Ethics Office, the CISMU counsellors, and/or the Ombudsman Office.

With regard to SEA, from some of the interviews, a concern was voiced in relation to the potential challenge of getting a structured overview of the victim assistance services available locally. Currently, the organization operates on a case-by-case basis when providing guidance and support to victims. Thus one might argue that there is a need for a unified UN-wide approach at each individual country level. This would provide the UN with a stronger platform for assisting victims, as each agency would be able to join forces locally and build a network of local support mechanisms. In line with this, UNDP contributed to the development of a Victim Assistance Protocol, which is an inter-agency initiative to explicitly communicate measures around the safety and protection of the victim, where there is a risk of retaliation or further violence against him/her.

## 4.2 UNFPA

The following section will present the main observations regarding UNFPA's current policies and procedures. The observations will be categorized in accordance with the framework for effective management of PSEA and SH; *Accountability & Governance; Prevention; Reporting & Investigations; and Assistance* (which is further described in chapter 3).

### 4.2.1 Accountability & Governance

#### ***Policies***

As with the other UN organizations, UNFPA's approach to SEA is governed by the Secretary General's Bulletin "*Special measures for protection against sexual exploitation and sexual abuse*" from 2003. In relation to SH, the organization has developed its own policy "*Prohibition of harassment, sexual harassment, abuse of authority and discrimination*" (2013), which was revised in December 2018 with a focus on ensuring a clear stance on and outline for the organization's work to prevent SH as well as alignment with the "*UN System Model Policy on Sexual Harassment*" (2018) and system-wide reform efforts. Furthermore, a number of additional policies are in place that govern specific aspects of SEA and SH, such as the Disciplinary Framework, which governs investigations and disciplinary actions, and the UNFPA Oversight Policy. These policies are supported by guidance materials, such as a one-page overview of grievance mechanisms and information on reporting mechanisms. Over the last couple of years, the focus within UNFPA has been on ensuring that the policies and procedures are comprehensible to personnel and that the accountability is clear in terms of roles and responsibilities and in relation to protection of both the alleged victim and the alleged perpetrator.

#### ***Roles and responsibilities***

*Tone at the top* – In the annual management letter, the Executive Director of UNFPA certifies the compliance with and ongoing commitment to meeting the PSEA requirements. This certification is based on the assurance of all UNFPA managers, who have been asked to certify their commitment to the PSEA efforts since 2018. In addition to this, senior management has published circulars to all personnel and to the president of the Executive Board on a regular basis since 2006, including information and examples of wrongdoing and the respective sanctions that have been enforced. Thus, focus is on ensuring transparency on SEA and SH non-compliance and misconduct within UNFPA.

*Senior PSEA Focal Point* – The Senior PSEA Focal Point was appointed in April 2018. The role focuses on providing strategic direction for the organizational setup to be able to respond to SEA and SH.

*PSEA Coordinator* – The PSEA Coordinator was appointed in August 2018. The role focuses on ensuring coordination of the SEA and SH strategy implementation within UNFPA and across the UN system to ensure coherence and alignment between the inter-agency operations and UNFPA's direction and road ahead.

*Regional and country offices* – At the respective regional and country offices a PSEA Focal Point has been appointed. The regional office focal points should provide oversight and coordination among the focal points in their region, whereas the country office focal points are responsible for all aspects of prevention and response, including the facilitation of training and PSEA awareness raising activities locally, including; beneficiary rights, where to report, compliant mechanisms and victims' assistance, as well as handling new procedures and drafting the annual action plans for prevention of SEA. In addition to this, the country office focal points serve as a first line of defense and contact points on the ground in terms of reports submitted. To ensure UN-wide coordination, the country office focal points are also part of inter-agency country networks. The regional office and country office PSEA focal points have a "dotted reporting line" to the PSEA Coordinator.

*Department of Human Resources (DHR)* – The main responsibility of DHR in relation to SEA and SH is to promote prevention through training and awareness raising activities as well as to provide guidance on informal resolution to alleged incidents. The PSEA trainings are done as mandatory online courses and

UNFPA has a 100% completion rate. In addition to this, DHR also provides training for managers in the field in order to provide clarification on expectations to their role and prepare the managers on how to handle challenging conversations as well as how to identify, handle and address areas of potential misconduct. When recruiting personnel a reference check is conducted by DHR and the candidate needs to go through a questionnaire and declare whether he/she has previously been investigated for misconduct. However, as these questions are posed as part of a questionnaire, the screening is based on self-reporting and thus one might doubt the truthfulness of the answers provided. To mitigate this risk, the UN-wide Clear Check Database is in process of being implemented, which will provide data on past SEA and SH perpetrators, who have held a position within the UN.

*Office of Audit & Investigation Services (OAIS)* – OAIS is responsible for the investigation function at UNFPA with the mandate to investigate allegations of wrongdoing, including all aspects of harassment and prohibited conduct including SEA and SH related cases. Investigations of SEA allegations have been part of the OAIS mandate since 2005. In late 2013 (formalized in 2014), OAIS was given the mandate to investigate all human-resources related allegations, including SH ones, as well as all types of allegations related to UNFPA's implementing partners. Furthermore, OAIS provides advice to management on policies and procedures (to the extent this does not jeopardize its independence) on – but not limited to – SEA and SH matters. OAIS conducts its case work in accordance with UNFPA policies and procedures, such as cases concerning, but not limited to, fraud and abuse of authority.

*Legal Unit* – The Legal Unit manages the disciplinary/ sanction process after the investigation process has been concluded, i.e. an investigation has been concluded with an investigation report issued by OAIS. The Legal Unit follows the relevant procedures by reviewing the investigation report, including all evidence collected, and may prepare charges of misconduct for consideration and issuance by the Director, DHR. The Legal Unit ensures that due process is upheld. The Legal Unit issues recommendations to the Executive Director through the Director of DHR, on the imposition of disciplinary measures and prepares the relevant instruments imposing disciplinary measures. If the case is assessed as a credible allegation that reveals that a crime has been committed, e.g. sexual assault, the Legal Unit has the mandate to coordinate with the UN Office of Legal Affairs any referral of such case to the authorities of the Member State, which is the state of the nationality of the alleged perpetrator.

*Ethics Office* – The Ethics Office is an independent office bound by confidentiality and charged with the mandate to ensure that personnel is protected against retaliation. The Ethics Office provides advice on ethical issues, providing personnel with a safe space to voice concerns and receive guidance on how to handle the issues at hand. If personnel wants to report an incident, the Ethics Office directs them to OAIS. The Ethics Office is also involved in providing mandatory trainings on SH, making sure that personnel understands the policies and procedures in place.

*Humanitarian Office* – The Humanitarian Office is involved in the SEA and SH work, providing country offices with advice on inter-agency humanitarian work as well as guidance on the country offices' work on SEA and SH in relation to implementing partners. The Humanitarian Office is in contact with the country offices on an ongoing basis to ensure that they understand their responsibility for preventing and responding to SEA and SH and that they are aligned with the processes in place. In relation to this, the Humanitarian Office is working with country offices to raise awareness of SEA and SH and encouraging them to be vigilant and ensure that the implementing partners are trained in this area and that they are signing on to UNFPA's policies.

To conclude this section, it should be noted that it was stated in some of the interviews that there might be a need to monitor the distribution of responsibilities and the ownership of procedures in order to ensure that bureaucracy and duplication of work does not occur in a setting, where resources are already stretched. This furthermore, entails the need for clarity on where the actual accountability lies in relation to the specific activities.

## **4.2.2 Prevention**

### ***Training, communication and outreach***

Several outreach and communication initiatives have been launched within the last year, including; the launch of a SEA and SH website, ongoing communication from senior management, development of guidelines and presentations as well as explanatory visuals and posters distributed at all UNFPA offices. In addition to this, all personnel has gone through face-to-face training on SEA and SH. Going forward, focus will be on providing targeted training to focal points, with a priority to high risk locations.

Through UNFPA's internal website "PSEA/SH community", personnel is provided with information, resources and regular communication updates to enable them to seek guidance and knowledge of PSEA and SH online. Furthermore, UNFPA's external website on PSEA and SH features an overview of the main content of the policies in a short and easily understood language. Furthermore, the website features explanations of the various measures in place, including training and reporting. On the website, one can also find a guide on how to report SEA, with a direct link to the online reporting formula to enable easy accessibility and user-functionality.

Even though, UNFPA has launched many activities to ensure internal awareness, some interviewees said that there might generally be an issue related to the overall understanding of the SEA and SH terminology.

### ***Action plans***

Every regional office is responsible for providing oversight of the development of the respective country action plans within the given region. Thus, it is the responsibility of the country office to draft and carry out the action plan to prevent and respond to SEA and SH. By anchoring the action plans at a local level, UNFPA ensures that SEA and SH efforts are not only high priorities at a corporate level, but also efforts rooted in the decentralized offices, where tailored mitigations can be carried out with a view to the specific local context.

### ***Implementing partners***

UNFPA has implemented the IP Protocol concerning PSEA and implementing partners. Since UNFPA delivers its services through a lot of different implementing partners, i.e. governments, national authority entities or global and local NGOs, this focus is highly relevant. The challenge in this area is how UNFPA can use its leverage to promote and ensure that implementing partners are in compliance with the IP Protocol. While SEA has always been prohibited and non-compliant with UNFPA's policy, this has now also been explicitly written into the General Terms and Conditions in every implementing partner agreement. Some of the additional obligations that UNFPA requires from implementing partners include; having adequate systems and mechanisms in place to prevent and respond to SEA.

As these contractual obligations are newly launched, the effect remains to be seen in practice. It has been stated in some of the conducted interviews, that these contractual obligations have been met with some reluctance from a number of implementing partners. It has largely been accepted by governments. However, UNFPA has experienced some pushback in the signing of the agreement from some NGOs, who might not have these requirements in place due to their small size and local setup. Thus, there lies a challenge in implementing the IP Protocol, while at the same time working with significantly smaller partners, who might not have the resources and capacity in place to live up to the requirements.

### ***Enterprise Risk Management (ERM)***

In 2018, UNFPA has also included SEA and SH risks into the organization's overall ERM framework. One might argue that this ensures a solid anchoring of and ongoing attention to the SEA and SH work across the organizational divisions, showcasing a strong commitment to manage and mitigate the risk of SEA and SH at both a strategic and operational level.

## **4.2.3 Reporting & Investigations**

### ***Reporting mechanisms***

A number of reporting mechanisms for SEA and SH are available within UNFPA, including; multiple entry points such as a dedicated website hotline, in five of the six UN official languages - Arabic, Chinese,

English, French, Russian and Spanish; which can be anonymous, via a designated e-mail, mail, fax or phone hotline to OASIS, or by contacting OASIS personnel directly. Reporting can furthermore be done to a manager, who then has the obligation to report to OASIS. In addition to this, a dedicated website hotline is available on the main UNFPA website ([www.unfpa.org](http://www.unfpa.org)), at the bottom of each page, where users are able to click on "Report wrongdoing". It is also available on the UNFPA country office websites in the same way. It has been noted, that despite the many different options, reporting channels are not working effectively to reach victims and/or complainants of SEA, who may not have access to internet/technology and speak a local language.

Prior to the SH policy revision performed in 2018, it was not possible to report anonymously on cases of SH and reporting was furthermore time-bound. This has now been changed, so that reports of SH allegations can also be made anonymously.

In connection to this, it may be relevant to note that some interviewees have stated that cultural differences are expressed to be "immense" across UNFPA's locations and that these differences might be a barrier for reporting, including: cultural implications, language barriers, fear of reprisal or lack of trust in the organization to take sanctions or in the investigative body to be unbiased and professional. These are all issues that need to be considered in the training, communication and outreach activities expressed in section 4.2.2.

It has, in some of the conducted interviews, been suggested that there might be a risk of unclear segregation of duties between the parties involved in managing the reported SEA and SH allegations. This might potentially result in a situation, where it can be difficult to determine, who is accountable at which stage. Nonetheless, segregation of duties might also cause silo-based operations with no overall ownership of the SEA and SH problems. Consequently, focus should be on ensuring personnel's trust in the system as a whole, with an emphasis on management capacity and the ability to respond in a timely manner, when incidents are reported. This might be closely linked to people's perception of the reporting and investigation process, rather than how cases are actually handled. Thus, it might be valuable to consider, whether the transparency of the case handling can be heightened in terms of providing the individual, who has reported the incident with brief updates on progress at a more frequent basis, than what is the practice stated in the current policy.

In relation to transparency, it might also be useful to consider increasing the level of information between the people working with PSEA and SH across UNFPA, e.g. information of the amount of SEA and SH cases reported, without impeding the confidentiality. This would potentially enable UNFPA to plan and tailor the response and prevention more efficiently.

Currently, UNFPA offers the following remedial options – investigation and/or legal mediation. Thus, some interviewees have highlighted the need for more options with a particular focus on what the victim wants, such as the option to relocate to another UNFPA office.

### ***Investigations***

In UNFPA, formal reports regarding SEA as well as SH are made directly to OASIS. OASIS then conducts a preliminary assessment of all allegations received. After OASIS has concluded an investigation (which includes a quality assessment process) and the allegation(s) is/are considered substantiated, OASIS issues an investigation report which is transmitted to the Legal Office, which then advises the Director of DHR on the commencement of the disciplinary process, including by preparing charges of misconduct for his/her signature. Often the burden of proof can pose an issue in these sort of investigations, given the type of evidence; further to the burden of proof shifting depending on the severity of the allegation. While OASIS accepts anonymous reporting, it may be difficult to address these allegations if there is insufficient information and no recourse to contact the person who reported anonymously. Overall, the investigation of SEA and SH cases is time-consuming and puts a great strain on the resources in OASIS. Another issue that was brought up was the need to ensure trust in the investigation team as they may seem far away being placed at HQ.

#### **4.2.4 Assistance**

##### ***Support mechanisms***

UNFPA has a solid assistance setup in place, providing a range of short-term and long-term support measures to victims of SEA and SH. The SEA support mechanisms are provided through the organization's existing referral pathways for gender-based violence (GBV), where UNFPA has institutional knowledge as the lead agency for GBV. In relation to this, UNFPA is currently in the process of mapping GBV referral pathways for use in SEA cases. The SH support mechanisms include protection and safety, stress counsellors, UN Medical Services, psychological and legal support, and mediation and counselling by the Ombudsman's Office as well as other local social support services from third parties. When it comes to victims of SH, the DHR focuses on finding a resolution at the early stages through prevention and early intervention.

## 4.3 UNOPS

The following section will present the main observations regarding UNOPS' current policies and procedures. The observations will be categorized in accordance to the framework for effective management of PSEA and SH; *Accountability & Governance; Prevention; Reporting & Investigations; and Assistance* (which is further described in chapter 3).

### 4.3.1 Accountability & Governance

#### ***Policies***

UNOPS has an extensive policy framework which governs SEA and SH. Within the Operational Directive "*Legislative Framework (promulgated) – OD.PCG.2017.01: Human Resources, Ethics and Culture*" it is stated that UNOPS personnel must abide to any standards defined by the General Assembly and the Secretary-General. This includes the Secretary-General's Bulletin ST/SGB/2003/13 on "*Special Measures for Protection from Sexual Exploitation and Sexual Abuse*". In relation to discrimination, harassment, sexual harassment, and abuse of authority these behaviors also constitute prohibited conduct within UNOPS as stated in ST/SGB/2008/5 "*Prohibition of discrimination, harassment, including sexual harassment, and abuse of authority*".

The Operational Directive mentioned above is further described in the "*Operational Instruction Ref. OI.PCG.2017.01 - Personnel Management Framework*". The purpose of this OI is to outline how UNOPS personnel shall be managed, and it is addressed to the broad range of UNOPS personnel (personnel, HR practitioners, supervisors, and heads of business units). The OI includes provisions regarding PSEA and SH.

One might argue that the relationship of the various policy and procedural documents, due to the complexity and nature of these documents, may be somewhat difficult for ordinary personnel to comprehend, creating some uncertainty among personnel, instead of providing them with a clear indication of how to manage a potential SEA or SH case. Thus, there might be a need to ensure that communication to the broader organizational audience is targeted and simplified for instance through the availability of short versions of policies and procedures with explanatory graphics. In relation to this, the introduction of the supporting PQMS documents, containing visuals and short descriptive texts, does provide some guidance to the fairly long policy documents. Furthermore, the PQMSs contribute to ensuring a more agile setup for updating procedures to enable the organization to take actions.

#### ***Roles and responsibilities***

*Tone at the top* – Ensuring clear roles and responsibilities is essential to make sure that the SEA and SH efforts are anchored across the organization. Within UNOPS, the SEA and SH efforts are anchored at the top with strong commitment from the Executive Director, who communicates this obligation to management and personnel on a regular basis. This entails that the Executive Director has instructed the senior management team to certify to her on an annual basis in writing, that they assume full individual responsibility and accountability for the fulfilment of the organization's obligation regarding prevention of SEA under their respective areas of authority/management.

Furthermore, an annual report on misconduct is published, which also covers the number of SEA and SH cases reported and investigated as well as the disciplinary actions enforced during the past year. The public report is available to internal and external stakeholders and this emphasizes and promotes the organization's focus on transparency. It should be noted though that the transparency concerning the incidents does not include transparency of the perpetrator's grade level.

*PSEA Working Group* – A cross-functional working group with participants from Internal Audit & Investigations Group (IAIG), the Ethics Office, Legal Group (LG), People & Change Group (PCG) and Health, Safety, Social & Environmental (HSSE) was established in December 2018 to help drive the effort and ensure alignment across the internal units working with the SEA and SH issues. The members of the working group have SEA and SH as part of their day-to-day responsibilities, but the work is balanced against other focus areas in their respective job descriptions. As such, UNOPS does not have a resource

focusing on SEA and SH fulltime. In this regard, it might be relevant to consider the time allocation between administrative tasks set against the time spent on the actual response to incidents.

*The Ethics Office* – The Ethics Office is an independent office bound by confidentiality. In relation to SH and SEA, the Ethics Office has a two-fold role; 1) It is within the Ethics Office’s mandate to ensure that victims are protected against retaliation, and 2) The Ethics Office provides a safe space for personnel to voice concerns or complaints, before deciding whether to report it formally or to seek an informal resolution. It might be relevant to note that the Ethics Office’s confidentiality can pose a dilemma in cases where the alleged victim is not prepared to report the incident, as the Ethics Office in these situations are not able to take the matter further, although it might be important from a preventive angle as well as from an accountability stance.

*People & Change Group (PCG)* – In UNOPS the responsibility for coordinating the outreach and communication effort as well as trainings lies with the PCG. The PCG is furthermore responsible for ensuring that appropriate preventive and corrective measures exist to allow personnel to educate themselves about UNOPS’ expectations regarding work ethics and culture, as well as to allow personnel to request action by the organization where they consider themselves the victim of discrimination, harassment, sexual harassment, or abuse of authority. The PCG receives reports of incidents regarding SH (please see the reporting section below for more information). In relation to this, the PCG is responsible for conducting preliminary assessments on the reports of incidents regarding SH. This task is done in cooperation with a network of peers (which will be elaborated on in section 4.3.3).

*The Legal Group (LG)* – The LG is involved in assessing the receivability of incidents regarding SH reported to the PCG, as well as in assessing the burden of proof for the alleged case, and providing guidance on the legal implications of the reported misconduct.

*Internal Audit & Investigations Group (IAIG)* – The IAIG receives reports of incidents regarding SEA. The IAIG is responsible for investigating alleged misconduct across a number of areas, e.g. fraud, abuse of authority, SEA and SH. In addition, IAIG conducts trainings of personnel, including SEA and SH. It also handles policy planning, engages in different internal task forces, plans investigations and composes general casework in accordance with UNOPS policies and procedures. Moreover, IAIG is involved in various internal and inter-agency initiatives related to SEA and SH.

*Managers and supervisors* – Managers and supervisors are responsible for creating and maintaining a harmonious working environment, free of intimidation, hostility, offence, and of any form of discrimination, harassment and abuse of authority, and ensuring that all discussions, communications, actions and reported allegations are handled with extreme sensitivity and utmost confidentiality. Moreover, managers and supervisors shall ensure that personnel under their supervision are familiar with the present legal framework on “*Protection from Sexual Exploitation and Sexual Abuse*” and the provisions regarding sexual harassment.

#### **4.3.2 Prevention**

##### ***Training, communication and outreach***

In the last year, there has been focus on ensuring ongoing communication on the issues of SEA and SH. Communication has been shared as Management letters from the Executive Director, as information emails from the Regional Directors and as awareness raising campaigns with posters and others visual aids by the PCG. In addition to this, SEA and SH are included in the UNOPS competency framework and the internal leadership programs in order to anchor and connect the commitment to the individual’s daily operations.

A new website on SEA and SH has been launched. The external website includes short and easily understandable explanations of what SEA and SH are, and states “the 6 core principles” which all UNOPS personnel must follow. This specific SEA and SH website (which is a sub-site to the IAIG site) does not include a link to or an instruction on how to report a complaint.

In terms of training, the SEA and SH issues have been included into several training materials and presentations, so that the topic is addressed both by the PCG and the IAIG, when conducting trainings and presentations at HQ as well as in the local offices. Recently, an Integrity, Fraud and Ethics Awareness

survey was conducted internally in UNOPS. The survey showed that the most common channel used by personnel for reporting misconduct is their supervisor. To cater to this result, the Ethics Office has developed trainings with a specific focus on equipping supervisors to handle reported allegations of misconduct.

It is important to note that across the UN, there might be varying perceptions of what is right and what is wrong behavior in practice, due to different nationalities and different local cultural norms. This also counts for UNOPS. Even though mandatory eLearning and communication has been rolled-out to all UNOPS entities, the understanding of what is appropriate UN conduct may differ. It has been pointed out during the interviews, that there might be a need to highlight the importance of “walking the talking”, especially in local settings, where the predominant culture may have another tolerance and understanding of appropriate conduct than what is acceptable in a UN setting. This is a potential barrier for a successful cultural transformation within the organization. Furthermore, due to the organization’s business model, where personnel is recruited short-term for specific projects, the yearly employee turnover in UNOPS was at 20.6% in 2018, which makes it important to keep focus on ongoing training, communication and local discussions.

#### **Action plans**

Within UNOPS, the action plan for managing SEA and SH is developed and owned at a corporate level within PCG. On the one hand, this helps to ensure that the plan is carried out without delay and closely monitored. On the other hand, this could also potentially impede the local engagement and commitment to the SEA and SH efforts, consequently potentially disabling the local anchoring of accountability.

#### **Implementing partners**

Across the UN, focus has been on ensuring that each organization has adequate safeguards and establishment of appropriate actions to manage and mitigate SEA. This has been stated in the *“UN Protocol on Allegations of Sexual Exploitation and Abuse involving Implementing Partners”*, which has been developed by the UN SEA Working Group with contributions from members of the IASC AAP/PSEA Task Team.

To meet these requirements, UNOPS has implemented an engagement screening tool, where questions related to SEA and SH are included. The engagement screening needs to be performed prior to starting a new engagement with an implementing partner. The aim with this is to ensure that partners are aware of their responsibility. As such, UNOPS wishes to be an actor of change. One might consider whether screening partners are sufficient to mitigate the risk of SEA or whether it might be relevant to conduct a third party audit process as well in the future.

### **4.3.3 Reporting & Investigations**

#### **Reporting mechanisms**

Within UNOPS, there are a number of reporting mechanisms in place for personnel to report alleged misconduct. Thus, personnel may report suspected misconduct to the internal grievances email (operated by PCG), to the fraud hotline email (operated by the IAIG), or to an immediate supervisor or to another appropriate supervisor within the business unit. The supervisor shall then immediately report the matter to IAIG or PCG, depending on whether the case is related to SEA or SH. One might question, whether it is clear to personnel that they can use the fraud hotline email to report issues of SEA and SH, as the name of the email might not be telling in this regard. In relation to the protection of retaliation, these reports should be submitted to the Ethics Office, which is responsible for handling these cases.

UNOPS is furthermore in the process of implementing an independent helpline to be operated by an external service provider to ensure impartiality. The multiple reporting channels provide the individual with significant options for reporting misconduct. In general, it is a strength that there is a multi-pronged approach, which can take the different circumstances into account that the victim or witnesses of an offense may be in. In that respect, it is a strength that UNOPS does not provide a one-size-fits-all solution. Yet, there is a risk that the many options may create some confusion in terms of where to report what.

In order to avoid that cases which should have been dealt with in IAIG are started in PCG, the PCG has instituted a procedure where all complaints sent to the PCG are reviewed by the Senior Legal Officer, who evaluates whether the complaint, if true, constitutes harassment, sexual harassment, abuse of authority, and/or discrimination. The case-handling is then started by the right office from the beginning, which should avoid time lost if a case is started the wrong way. The new independent hotline being implemented will also ensure that reports of misconduct are channeled to the appropriate department from the very beginning.

### ***The network of peers***

In 2016, UNOPS launched the network of peers-approach to conduct preliminary assessments of, inter alia, allegations of SH. The objective of the preliminary assessment is to collect and evaluate readily available evidence with the aim of determining whether a complaint of prohibited conduct is credible and warrants an investigation. Depending on the circumstances, the preliminary assessments may be conducted by an established network of 17 peers, who have been selected from across the UNOPS organization, with a focus on ensuring different profiles, geographical locations, gender, ages, levels of seniority, educational background, languages spoken and nationalities. The network of peers has been provided with training on UNOPS' values, mediation, and how to conduct investigative interviews. They have furthermore signed a document stating that they are bound by confidentiality in all work done as part of the preliminary assessments. The aim, by implementing this network, has been to bring nuance to the cases assessed.

Based on the conducted interviews, we have received good feedback on the network of peers-initiative overall. One of the elements that has been highlighted as working well, is the overall confidence that people have in talking to their peers. Thus, it is experienced as a safe space, where there is an equal dialogue and where experiences might be shared. However, for the network of peers to merit its responsibility, it is important that the personnel engaged in the network upholds the highest standards for confidentiality as well as for their own conduct. If one of the peers in the network is perceived as not living up to these standards and the overall UN values, there is a risk that the confidence in and credibility of the network of peers will deteriorate.

### ***Investigations***

To ensure that the personnel feel that their reported incidents are taken seriously and managed in due time, IAIG has decided that all cases related to SEA and SH should be concluded within a six month timeframe. IAIG standard operating procedures also require that if the initial review of a complaint warrants an investigation, then IAIG will open an investigation within 90 days after receipt of the complaint barring any extenuating circumstances.

Nevertheless, there might still be an issue of lack of confidence in the investigative process, as some members of personnel might feel that the process is too long and non-transparent. Moreover, it is an investigation, which means that the victims are subject to thorough interviewing, which can be trying for these women/men, who are already very vulnerable. This can potentially harm the willingness to report SEA and SH incidents, as personnel might feel less inclined to report these sensitive matters, if they do not feel that they are able to see the results of the work done. The IAIG is aware of this risk and tries to keep the people directly involved in the loop on the process whenever possible.

When reports are anonymously submitted, this might impede the possibility of assisting victims, which might be the downside of the victim-centered approach. Another difficult issue is to balance the protection of confidentiality regarding the parties involved, while at the same time being able to react in a preventive manner to a situation within a UNOPS office. While an investigation is going on, it is not possible to inform e.g. the country responsible manager about the issue, even though the person might be able to do something restorative for the office in question.

## **4.3.4 Assistance**

### ***Support mechanisms***

The "*PQMS Manage Protection of Victims (promulgated, effective 15 February 2019)*" document contains a description of the measures in place to protect victims of SEA or SH. In connection to this, it is the Director

of PCG, who has the authority to decide when and which measures should be initiated to protect victims of SH or SEA committed by UNOPS personnel. These support measures are available to victims whether they choose to report through formal or informal channels. In addition, it is possible for both UNOPS personnel and a third party to request the measures to be invoked on his/her behalf or on behalf of third party, who has been a victim of SEA or SH. The support measures are aimed at providing interim support to victims until the ongoing investigation of the case is completed. Furthermore, the measures are in place to provide services and resources to ensure a safe working environment for cases related to SH.

UNOPS works with a victim-centered approach and to this end, the UN Victim's Rights Advocate Office is the lead on a pilot project to provide victim support and how to handle this. Currently, five countries within UNOPS' field operations are part of the UN-wide pilot: Central African Republic, Haiti, South Sudan, Jordan and Syria. In relation to this, each of the five countries have appointed SEA focal points amongst their personnel, who will be responsible for coordinating the local effort. Thus, the IAIG and PSEA Working Group will in the coming months provide training to the new SEA focal points. There might be an issue related to the extensive work required by the five countries to roll out and increase the SEA effort. Especially, as this work comes on top of the appointed SEA focal points' other work tasks in offices, where shortage of resources often already has personnel under significant pressure.

#### **4.4 General observations across the three organizations**

The following section will present some general observations applicable across UNDP, UNFPA and UNOPS.

##### ***Perception of accountability***

Across interviews with respondents from the three organizations, it has been mentioned that the general perception of accountability in relation to the response to SEA and SH might be an issue. Ensuring personnel's trust in the internal setup to manage reported SEA and SH cases might be challenging, as interviewees have mentioned that there might be a general perception amongst personnel that, although policies are in place and quite clear, the UN has a history of not holding senior level personnel/management members accountable for SEA and SH offenses. Even though, this perception may be based on old cases, it will take a focused effort to provide a clear direction and demonstration of practice to change this perception and invoke trust in the internal system.

Adding to this, the communication of disciplinary/contractual actions enforced has not previously been as transparent as it is today across the three organizations. Thus, personnel might view this as if allegations have had no consequence for the senior level alleged perpetrator, who, at best, might have been relocated to another UN entity. To mitigate this risk, the UN-wide Clear Check Database is in the process of being implemented, which will enable UN organizations to go through a central database of former UN personnel, who have been charged for SEA and SH misconduct. Thus, the introduction of the Clear Check Database might assist in ensuring the fundamental trust in the prescribed accountability and actual performance mechanisms of the internal setup, which is essential for the successful implementation of prevention and response to SEA and SH.

##### ***Training, communication and outreach***

From the interviews with representatives from the three organizations, it has been noted that some might be concerned whether the mandatory SEA and SH trainings, developed at corporate level, might be too generic and theoretical – i.e. not considering the different local and cultural contexts in which personnel operate. Thus, there might be a risk that the training primarily becomes a compliance and check-the-box exercise, without resonating impact at a local level. In relation to this, it might be relevant to consider who is providing and facilitating the trainings. When facilitating trainings, it might thus be different what personnel focus on, depending on their professional background, function within the organization and level of engagement in the SEA and SH work – and hereby the trainings' impact become people-dependent.

Furthermore, it might be worth noting the potential cultural barriers that exist across corporate and local levels in the three organizations respectively. This entails a focus on how policies and procedures are understood at a local level as well as a focus on ensuring a mutual understanding of what contains UN culture, values, and behavior in a setting, where national cultural norms might encourage and accept a behavior deemed inadmissible in a UN context.

##### ***Reporting***

A new SEA reporting tool, "The Incident Reporting Form", is currently being implemented in selected countries/offices across the UN as a pilot test. The form is an 8 pages long document with potential language barriers and a set of complex questions to be filled out. Thus, some interviewees have deemed this form to be too extensive and complicated considering the local contexts, where the form will be used. Accordingly, there is a need to find the right balance, so that it is not too difficult for victims to report, while at the same time ensuring that adequate information is obtained to start a case investigation.

A number of interviewees pointed to the challenges that all UN bodies face in relation to underreporting of SEA and SH incidents. Most interviewees assumed that the lack of reporting might be due to cultural differences and the fact that there are regions and countries, where local understanding of SEA and SH differs from UN's. Thus, the three organizations need to be aware of the potential cultural barriers for reporting incidents. In some countries potential victims might be afraid of retaliation or concerned for their safety, they may be unsure of how their managers will react, they may fear that they will lose their job, or that they will be perceived as troublemakers, if they report an incident.

Consequently, it is important that all three organizations keep a particular and ongoing focus on this in their work with local offices to ensure that local culture takes a back seat to corporate culture with UN values as precedence for guiding behavior. Other root causes for lack of reporting might be; insufficient access to reporting mechanisms locally, insufficient awareness of the reporting mechanisms or insufficient trust in the reporting mechanisms. All issues that need to be considered, when building the reporting setup.

In the training materials received from the three organizations as well as from the input gained through the interviews, it has been clearly stated that all UN personnel have a responsibility to speak up and report incidents in accordance with the motto; "If you see something, say something". Thus, UN personnel may report allegations on behalf of others, if they have witnessed misconduct occurring, provided that the complainant identifies him/herself. In addition to this, it is stated that anonymous allegations must be accepted, if they are accompanied with sufficient information and evidence to determine whether the allegation is receivable.

### ***Investigations***

*Limited resources available* – It has been stated in a number of interviews across the three organizations that the increased focus on SEA and SH might cause other issues of misconduct to be "forgotten", as this focus may remove some attention to and resources available for the investigation teams to conduct other allegations of wrongdoing such as fraud, embezzlement, abuse of authority, discrimination and harassment<sup>5</sup>. The internal stakeholders' expectations to the investigation teams' ability to provide a prompt case handling adds to this challenge – together with issues such as bureaucracy, required attendance at new forums and the amount of procedural paper work. All these elements take focus away from the actual investigative work and the prevention effort on the ground.

*Feedback to victims* – A recurring issue highlighted in a number of the interviews conducted across the three organizations is the lack of ongoing feedback to victims on the investigation progress of their reported allegations. Consequently, victims may potentially lose confidence in the internal system, if they feel that the investigations are not conducted with a focus on timeliness and efficiency.

*Confidentiality* – Many interviewees have pointed to the two dimensions of confidentiality in relation to investigations. There is no question that the involved parties' confidentiality, victim, witnesses and alleged perpetrator alike, must be protected. However, this might pose a challenge in practice, especially in situations where the implicated allegations come from a small office/team. Thus, there might be an issue related to upholding confidentiality and preventing rumors to catch on internally. On the other hand, confidentiality can also indirectly impede a preventive effort, while the investigation is in progress. For instance, the regional director or country director is not always informed of the investigation, while it is underway. This entails that the regional or country director is not able to exercise managerial duty of care and contribute to the restorative effort, even though this, in some cases, might have been the preferred solution.

### ***Assistance***

Even though the policies on SEA and SH are quite extensive, the assistance part is the segment least described. Thus, there might be a number of uncertainties in relation to: who is responsible for the assistance internally and whether the assistance will be funded by UN, the individual organization or the specific project. Furthermore, it might be relevant to specify what the organization can offer of support to SH and SEA respectively as well as how the assistance effort is coordinated across UN organizations. Lastly, it should also be considered when a victim is eligible for receiving assistance as well as what will happen to the assistance to a victim, when a project ends.

### ***Inter-agency initiatives***

Based on the input gained from interviewees, it seems that the UN is in the process of assessing how to use the different inter-agency task forces and working groups the most efficiently, with a focus on ensuring a distinction of when the effort should be managed centrally and when to adapt the processes locally in the respective organizations. A general observation on the inter-agency initiatives, stated by

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<sup>5</sup> Limited resources has also been voiced as a concern for other offices/teams.

interviewees across the three organizations, is that these are essential in order to provide a forum for sharing experiences and aligning the effort across UN organizations. However, a number of interviewees have also mentioned that these inter-agency initiatives are rather time-consuming and take resources away from the other day-to-day tasks, such as; providing guidance to victims, implementing prevention activities, investigating allegations, etc.

### ***Victim-centered approach***

In regard to ensuring a victim-centered approach, it is clear that all three organizations already are launching many activities to support this, such as; providing mandatory trainings and ongoing communication related to SEA and SH, providing multiple reporting mechanisms to victims as well as enabling anonymous reporting of allegations. Furthermore, investigations offices will start handling allegations submitted within 48 hours. However, one might argue that there is still some room for improvements in terms of:

- adapting trainings to the local offices' context
- treating victims as rights holders
- offering a larger variety of resolution opportunities
- ensuring that the right competencies are in place within the investigations team to meet and deal with victims, and
- ensuring fairness and due process in investigations to both the victim and alleged perpetrator, as well as
- ensuring a local assistance setup to provide support tailored to the victims' individual needs.

### ***Continued focus and effort***

Some interviewees across the three organizations have voiced a concern in relation to ensuring the continued focus and effort within the PSEA and SH areas – also when the attention to these issues might be subsiding, due to other issues arising.

## 5 Recommendations

This chapter will present the recommendations developed based on the above observations.

### 5.1 General recommendations across the three organizations

#### ***Continue the communication from top-level***

The organizations have shown a clear tone-at-the-top regarding SEA and SH. Since an important part of the process is about cultural change in the organizations, it will take some time before the effects of these efforts can be seen. In some parts of the organizations, the change of mind-set will probably take longer time than in others. Furthermore, the continuous onboarding of new personnel and managers calls for a long-term communication effort. Therefore, it is recommended that the clear commitment and focus from the top-level management persists in the coming years as well as a focusing on cascading the communication task down into the lower management levels.

#### ***Policies and procedures should be clear, accessible and easy to understand***

All three organizations have few main policies governing SEA and SH, and what seems to be a substantial number of supporting documents in the form of procedural documents and guidelines. These are important to the coordinating units and to entities responsible for specific parts of the SEA and SH prevention and response. However, to the rest of the personnel and the “ordinary” managers in the organizations, this can be difficult to comprehend, lead to information overload and, at worst, neglect. It is recommended that the communication is revisited in order to simplify where possible. It is furthermore recommended that it is tested whether personnel are able to understand the procedures relevant to them, and that communication to the broader organizational audience is targeted and simplified, so that e.g. short versions of policies/procedures with graphics are made available as well as supporting visual communication in the office space.

#### ***Show accountability***

It is important that all organizations show accountability in their actions, when cases are being dealt with. One of the issues resulting in a lack of trust is the perception that some people in the organizations are “protected” against reports due to their rank, specific competencies, etc. It is recommended that it be clearly shown that this is not the case. It is recommended that the organizations increase the transparency around cases and the outcomes. For instance with regard to the annual reports on misconduct cases, it should be made visible what grade level the perpetrator had and possible other relevant data that does not compromise confidentiality (this has already been implemented by UNDP in the Annual Report of the Administrator on Disciplinary Measures).

#### ***Training targeted to specific needs***

The training of managers and personnel has been rolled-out and is now a standard part of the organizations’ training programs. It is recommended that the standard training is continued. Moreover, it is recommended that more tailored training options are developed and rolled-out to cater to the local context. E.g. to respond to the fact that there are regions and countries, where local understanding of SEA and SH differs from the UN’s or where circumstances around human rights protection and a safe working environments are difficult. It is recommended that the organizations work on explaining and adapting the mandatory training to the specific local context. This could be further strengthened by more face-to-face training on locations.

#### ***Accountability with implementing partners***

All organizations are communicating the policies on SEA to contractual and implementing partners on an ongoing basis, and have strengthened the requirements in the contracts and programming instruments or are in the process of doing so. The actions of the different contractual partners can be difficult for the organizations to monitor and control. It is recommended that the organizations work closely together including with other UN organizations, in order to find out what works best in practice, and to ensure that the right tools and resources are in place.

At the same time, the potential role of the implementing partners as role models and ambassadors in this field has not been emphasized in the review process. It is recommended that the organizations look further into how third parties could engage proactively in the efforts as ambassadors in relation to SEA and SH.

### ***Suitable mix of reporting channels***

The existence of multiple reporting channels to support the needs of victims in different locations and circumstances is an important feature and all organizations have put several options in place. Still, the impression is that a fair amount of victims either do not come forward at all or seek advice/report in person and not by sending an email to a head office unit. It is recommended that the organizations strive to meet this extra need for personal contact, in addition to the reporting channels already established, when seeking advice or reporting. For instance, this might be by establishing more local reporting mechanisms or services.

### ***Following the experience with the "network of peers"***

It is recommended that the experiences with UNOPS' "network of peers" solution be followed closely in order for the other organizations to learn from this specific setup.

### ***Considering the investigations capacity***

It has already been a priority in all three organizations to ensure SEA and SH competencies in the investigations units and to decide that these cases are prioritized. It is recommended that it be evaluated whether the investigations units can meet the expectations and obligations laid on them in the current setup. In that respect, the full case portfolio for the investigations units should be taken into consideration, since there may exist some anxiety that SEA and SH cases will trump other cases which can lead to an undesirable situation in the long run. Moreover, it is recommended that the organizations look into further possibilities of pooling investigations resources and specialist competencies in SEA and SH cases in order to be able to perform the investigations and related tasks in the best and most efficient manner possible. In addition to this, one might consider the gender split of investigators to provide a suitable profile for the individual investigations.

### ***Ensuring ongoing information to the parties involved***

In general, there is a high level of confidentiality surrounding the investigations of SEA and SH cases, which is highly relevant. Yet, this should not impede the possibility for the complainant as well as for the accused of getting some information and status during the process. It is recommended that it be evaluated how parties in an investigation can be informed during the process.

### ***Clarifying the assistance set up***

While different types of victims' support are already in place, there seems to be some uncertainty as to what exists, and a need to expand the options. Especially with regard to PSEA but also in regard to SH, inter-agency initiatives seem appropriate. It is recommended that an overview be made of the different assistance services available across the UN and in each organization, centrally and at a local level. This entails clarification on the assistance governance set up, including whether assistance will be funded by UN, the individual organization or the specific project. Furthermore it is recommended that the information be made available at a local level. In that sense, it might be important to use advocates such as health service providers outside the UN to communicate this.

### ***Focusing on restorative measures***

In general, the review has not uncovered actual measures with the purpose of having a restorative effect on the working environment of the office/team, which has been effected by the SEA or SH incidents. It is recommended that it be examined if and how trusted offices like e.g. the Ethics Offices or the Ombudsman's Office could have a role in a restorative process for the offices/teams in question. This could have an effect on the immediate situation within the office/team, as well as a general preventive and cultural change effect.

### ***Prioritizing next steps***

It is a general observation amongst some of the offices/teams involved directly in the SEA and SH procedures that until now, quite a lot of time and resources have been spent on establishing and updating

procedures and measures in the individual organizations. Furthermore, several inter-agency task forces, coordination groups and progress reporting setups have been put in place. This means that less time has been available for on-the-ground SEA and SH activities and actual case handling. It is recommended that the internal reporting processes be streamlined across the UN to ensure a coherent setup. Furthermore, it is recommended that coordination groups, etc. be structured to ensure that overlapping agendas across the groups are avoided, thus ensuring that the effort is concentrated around what is most relevant for next steps.

## **5.2 UNDP**

### ***Enterprise risk management***

It is recommended that UNDP consider how to include SH risks into the organization's overall ERM framework, where SEA was included in 2018. This would contribute to ensuring that the risk of SH is managed and mitigated both at a strategic and an operational level.

### ***Follow up on country level action plans***

The UNDP country actions plans appear to be a strong initiative, creating accountability at a local level. In that respect, it is important that progress and actions are followed up. Not just from a monitoring and compliance view, but, not least, in order to assist country entities, who find it difficult to implement this in practice. It is recommended that follow-ups on the action plans and further support and guidance be prioritized going forward.

## **5.3 UNFPA**

### ***Risk of lack of transparency internally in terms of who does what***

The organization has many entities involved in the actions related to PSEA and SH. This is a strength since the different competencies grant UNFPA the possibility to be versatile and engage in many different ways. It should be noted though that the many actors in this field may, at the same time, pose a risk that the responsibilities are blurred – both in terms of perception and within the actual operations – and that the collective efforts become more difficult to coordinate. It is recommended that the internal coordinator in UNFPA be especially attentive to this.

### ***Involvement of DHR***

From the review, it is the impression that UNFPA's Department of Human Resources primarily plays a role in awareness, training and guidance on where to report incidents. With the competencies normally existing in an HR department, it could be considered whether the office should play a larger role in relation to assisting victims, e.g. by less formal solutions to non-severe incidents.

## **5.4 UNOPS**

### ***Communicating on the external website***

Broadly, victims and stakeholders may have many different entry points and preferred communication channels to the organizations. However, it is perceived as important that the organizations' websites contain SEA and SH information, which is readily available and provides clear guidance on how to report misconduct and seek assistance. It is recommended that UNOPS seek to make its website more accessible and informative, as well as provide direct links to reporting and assistance.

### ***Local/country action plans***

It is the impression that the initiative around requiring country action plans in other organizations has a good effect so far as being an enabler of sensitive discussions in the different entities, and a tool for the organization to follow up on commitments and actions taken. It is recommended that UNOPS consider a similar initiative accommodated to the conditions in the organization.

***Enterprise risk management***

It is recommended that UNOPS consider how to include SEA and SH risks into the organization's overall ERM framework. This would contribute to ensuring that the risks of SEA and SH are managed and mitigated both at a strategic and an operational level.

# 6 Appendices

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