

# Evolution of collective IASC member culture on protection against sexual exploitation and abuse and sexual harassment

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# SUMMARY

This paper considers a series of cultural barriers that experts on protection against sexual exploitation and abuse and sexual harassment (PSEAH) and humanitarian managers believe are still hindering our collective progress.

Our findings are based on a range of interviews conducted with participants in recent Inter-Agency Standing Committee (IASC) Scale-Up responses. These findings were then triangulated with a series of operational, research, and investigative reports. The sector is starting to see progress on PSEAH, and technical innovations are contributing to additional improvements in our systems; however, we have found there is still not enough change in our operational culture.

This paper finds that many members in our sector still do not fully accept that the risk of sexual exploitation and abuse and sexual harassment (SEAH) is a reality in every operational context – and not just restricted to “a few bad apples”, nor are effective PSEAH policies seen as a cornerstone enabler of principled humanitarian response. Many leaders still believe the absence of SEAH complaints is a positive indication, rather than a red flag. However, this absence suggests that systems are weak, and trust is absent.

Concerns have been raised about a slowing of momentum and focus since 2018. It has taken 20 years to build this momentum and victims/survivors have suffered due to the slow pace of progress. So too has the reputation of the sector suffered and trust declined amongst key stakeholders. The sector is bracing itself for likely budget cuts, further exacerbating vulnerability and increasing power differentials, circumstances which provide opportunities for SEAH. We cannot claim that we are not aware of this risk. Leaders should be identifying ways in which they can be assured that the progress of the last decade is fully operationalised and sustained. Cultural change is arguably the most challenging leadership responsibility but also the most important to deliver zero tolerance on inactivity towards PSEAH. Recommendations for advancement are included.

## PURPOSE

This paper considers the progress made within the IASC community towards addressing cultural barriers which have impeded our progress on addressing Sexual Exploitation, Abuse, and Harassment (SEAH) across the humanitarian sector. These barriers include historical legacy and perceptions that still define our IASC collective culture as of mid-2023. The paper will emphasise shifts required in our humanitarian culture to enable stronger PSEAH efforts.

## APPROACH

The following criteria were established for this publicly available document: that it represents factual reality, and presents consistently experienced challenges. It was required to be concise, reader-friendly, and written in plain language. The report was drafted by an independent consultant and reviewed by World Vision International (WVI) and the Steering Committee for Humanitarian Response (SCHR) in their role as Inter-Agency Standing Committee PSEAH Champion.

A selection of recent IASC grey literature and other published reports were provided to the consultant and are referenced in this paper.<sup>1</sup> In addition, 10 anonymous key informant interviews with victim/survivor representatives, programme-level managers, humanitarian country team members and safeguarding professionals were undertaken by the consultant. All of those interviewed worked with/had worked with IASC members or SCHR members at country level between 2020 and 2023. Two of those interviewed then consulted with 13 persons working for partners of these IASC members to further validate the findings. The interviews were focused on the experience of delivering effective PSEAH in 2023 and the extent to which the prevalent cultural and power dynamics of the aid sector enabled, or inhibited, that effective PSEAH delivery.

## FINDINGS

### “No News is Good News”

#### A. An absence of SEAH complaints is mistakenly perceived as a ‘positive’

**The belief that a scarcity of complaints is positive continues to be expressed at all levels of IASC members. This is an incorrect assumption which needs to be challenged confidently and regularly by leaders such that staff might move beyond this myth.** An absence of SEAH complaints should be a red flag in any risk register; it should draw management attention and should trigger action to understand why SEAH complaints are not being received.

**We need complaints.** In welcoming them, we receive the information we need to respond to victim/survivors but also to take necessary action to prevent further harm. While mechanisms to prevent re-recruitment of perpetrators are collectively one of the most significant actions taken by the sector in the last decade, their success does rely on complaints being made and heard.

**Senior IASC members believe they welcome complaints. Their staff are less confident this is the case.** All IASC members are increasing their efforts to respond to complaints. Efforts include: training staff to receive complaints; adapting and upscaling investigation services; ensuring SEAH cases are prioritised amongst reports about other forms of misconduct; and establishing victim/survivor/survivor support mechanisms to address current numbers of SEAH complaints. However, agencies are often still scaling up to meet current demands, not preparing for what should continue to be a steady increase in complaints in response to improved awareness campaigns and trust-building efforts.

*“Leaders, including the IASC Principals, are not incentivised to ask ‘Why not?’ when there are no complaints.”*

**Interview with  
PSEAH expert**

*“It’s as a sector, I think for many, many years, we’ve been looking at ourselves in a very naive way. We’ve been thinking we do good, which means we are good. And we haven’t been calling out bad behaviours when we see them... I think that is something we need to own as leaders. And we need to change.”*

**Inger Ashing, CEO, Save the Children International**

(Source: *Leading Well: Aid leader perspectives on staff well-being and organisational culture* | CHS Alliance April 2021; <https://d1h79zlgfht2zs.cloudfront.net/uploads/2021/04/Leading-well-report-CHS-Alliance.pdf>)

<sup>1</sup> Grey literature refers to any information source that is not commercially published, such as documents produced by NGOs and similar organisations (Source: <https://library-guides.ucl.ac.uk/c.php?g=684020&p=4976190#s-lg-box-wrapper-18458251>)

Despite these efforts, some staff continue to perceive that humanitarian organisations remain more concerned about the perceived risk of malicious complaints, or the rights of the alleged perpetrators over the rights of victim/survivors. This means our risk management remains focused upon avoiding legal action, rather than systemic elimination of SEAH. This may be a legacy issue dating from the last few decades, when many humanitarian organisations were slow to act. We must acknowledge staff and stakeholder cynicism about the commitment of the humanitarian sector to investing in changing how we work.

**Where perceptions are outdated, agencies should be actively addressing them, listening, and building trust.** Information about increased reporting, case resolutions, and progress on PSEAH is available but it is not presented in a form that transparently communicates a balanced analysis of progress and ongoing challenges. **Communicating and listening to staff and communities and other stakeholders on positive change is important for trust building and addressing this heritage of doubt. Rebuilding trust will take radical transparency.**

Timelines of PSEAH activity show that action has often been taken by the sector when it is driven to do so by complaints – and media attention. This requires a mindset shift; **IASC members should receive both complaints and media attention as positive, as they challenge our normative culture and ensure our sector remains accountable and fit for purpose.** This perspective shift is part of the essential cultural change we need. Complaints and constructive scrutiny will only happen if leaders clearly state that SEAH reports are an indicator that systems are working and that reports are welcomed. Donors must feel confident asking, ‘Why are there no sexual exploitation and abuse (SEA) complaints?’

## CASE STUDY: Ukraine crisis

*‘Where are the complaints?’*

Interviews and consultations with PSEAH/safeguarding workers in the Ukraine response produce a clear consensus.<sup>2</sup> They want to know why their leadership is not concerned about the lack of SEAH cases and why this is not being actively investigated by the IASC Principals.

**If the Ukraine response has indeed effectively prevented sexual exploitation, abuse, and sexual harassment, then it is vital to know what we did right** in preventing abuse from occurring. If there has only been a ‘small number’ of SEAH complaints, it is important to know which resources put effective PSEAH in place and, critically, what budgets and budget sources were used that were not available for other, equally high-risk, contexts. It is an essential opportunity to determine best practice.

However, given the gender dynamics, scale, and history of the response, the story may not be so positive. If incidents do exist but are not being reported, then it is equally important to understand the reasons behind underreporting of SEAH in this protracted crisis. It might be that cases were reported in a third European country, with complaints being addressed through national systems. **Taking the initiative to consider scenarios where underreporting is notable should become normal practice. In agreed high-risk contexts,<sup>3</sup> IASC members should consider what their responsibility is when there are no, or very low, reporting numbers.**

<sup>2</sup> Interviews conducted June-August 2023

<sup>3</sup> <https://psea.interagencystandingcommittee.org/iasc-sea-risk-overview-index>

**IASC member entities are not effectively using the existing reporting data to scrutinise contexts where insufficient reports are being received.** We are not focusing on these contexts, and we are not driving the promotion of a ‘speak-up’ culture. As such, there is a perception that we prefer silence. This means that we fail to use the available data as an entry point for initiating discussion about what the organisational and contextual inhibitors might be and what the solutions might be.

**IASC members should seek to understand what aspects of their organisational cultures are preventing or hindering SEAH reporting,** agree on the minimum acceptable number of complaints, and agree on what to do when this minimum number is not reached. This approach requires consideration of the factors contributing to this minimum number of complaints and underreporting, such as the size of organisation, the type of programming, the delivery mechanism, and context.

Culturally, **it is critical to state clearly that managers and offices receiving complaints is a sign that systems are working,** while remembering that a holistic contextualised risk assessment involving community actors and women’s organisations is an important triangulation. It is also critical to ensure that women’s organisations and local organisations are partners in such work and their contribution is appropriately budgeted.

As 2022-2023 IASC PSEAH Champion, World Vision International/ Steering Committee for Humanitarian Response has been examining this issue in depth and piloting positive approaches to ensure leaders understand **increased reporting is a sign that systems are working** and to support offices receiving reports.

WVI has identified a series of steps for IASC members to take constructive action, putting in place support for effective detection, as well as positive indicators of success for offices and managers. WVI will be seeking to introduce this process across IASC members.<sup>4</sup>

Many IASC members have highlighted that de-funding often has the unintended consequence of deterring reporting; more needs to be done to reassure communities that reporting SEAH will not result in their programmes ending prematurely.

## **IASC member staff on their experiences in the Ukraine crisis and Türkiye earthquake**

*“We are not getting concrete cases [reported], but it is simply not possible that nothing is happening. The risks are known and too high.”*

*“We have too few cases. We need to be asking why we have such a small number of cases.”*

*“Yes, there have been some cases. I know of some in other organisations, but I am not hearing those cases reflected when we talk about numbers.”*

*‘Maybe SEAH is not happening, and it is all good, and we finally reached zero tolerance and there are just some minor cases. Fine. [But] if it is a success you want to know why.’*

*“Why is the leadership not asking about this every month? We have been telling them for years that underreporting is a red flag. Why aren’t they worried?”*

<sup>4</sup> <https://digna.ca/wp-content/uploads/2023/01/Identifying-areas-of-under-reporting-of-SEA-Case-Study.pdf>

## Change comes from within

### *B. Technical and systemic change is undermined by slow cultural change*

The progress made in creating structures, processes, and systems for PSEAH was recognised by IASC's 2021 External Review.<sup>5</sup> A critical part of this progress has been the efforts to better understand the underlying causes of sexual misconduct and how we, as a sector, need to change who we are if we wish address this.<sup>6</sup> Despite these efforts, many country-level IASC members struggle to embrace the importance of understanding SEAH's underlying causes and fostering an organisational environment to prevent SEAH.

## CASE STUDY: A look inside IASC documentation

The original commission for this paper was to draw on existing IASC grey literature and outline a broad, qualitative narrative describing the documentation to create a picture of the collective cultural norms and change regarding PSEAH culture in member organisations.<sup>6</sup> The purpose of these real-time peer support mechanisms is to identify and address political, structural, resourcing, and delivery challenges.

Recent iterations of IASC reports such as Operational Peer Review, Peer2Peer, have been tasked with looking at multiple challenges to delivery in complex and high-risk situations. They reference protection from sexual exploitation and abuse and occasionally reference SEA risk – without the 'H' of harassment.<sup>8</sup> These references are routinely limited to simple conclusions calling for PSEA activity to be scaled up, as one of several programme areas in need of reinforcement, whereas often no mention is made of addressing culture and contextual root causes.<sup>9</sup> **These reports do not, in their present form, deliver analytical information about the collective culture, power dynamics, and effectiveness of PSEA delivery. They do not contain reflections on the prevalent operational culture, recommendations for leaders of country-level IASC members on 'tone from the top' or the need to be aware of risks of abuse of power amongst essentially hierarchical humanitarian organisations.**

Operational Peer Review, Peer2Peer, the IASC Emergency Directors Group, and other senior level missions and assessments delivering reports to the IASC Principals routinely consider barriers to the application of humanitarian principles.<sup>10</sup> These considerations cover localisation and the empowerment of local actors, the Do No Harm principle, and the centrality of protection, while reflecting on how the absence of such approaches and functions hamper humanitarian responses. **While PSEA is included within the methodology of such missions, further focus on culture change is needed. Ensuring that all IASC humanitarian actors understand that effective PSEA is an enabler of principled humanitarian response is an important concept to consider during such missions. Finding means to better support leaders and managers to embrace PSEA as central to everything that we do, and address endemic contextual and cultural issues, is critical.**

<sup>5</sup> <https://psea.interagencystandingcommittee.org/resources/2021-iasc-external-review-pseash>

<sup>6</sup> <https://www.unhcr.org/sites/default/files/legacy-pdf/60ed8f0a4.pdf>

<sup>7</sup> As measured against the 9 Core Humanitarian Standard (CHS) Commitments: [https://corehumanitarianstandard.org/files/files/CHS\\_GN%261\\_2018.pdf](https://corehumanitarianstandard.org/files/files/CHS_GN%261_2018.pdf)

<sup>8</sup> Sexual harassment is not mentioned as this has not historically been an inter-agency responsibility at country level.

<sup>9</sup> Recommendations have been made to the IASC Principals and Deputies for PSEA to be included in the IASC scale-up protocols but have not yet been adopted.

<https://interagencystandingcommittee.org/humanitarian-system-wide-scale-activation>

<sup>10</sup> <https://www.deliveraidbetter.org/>; <https://www.humanitarianresponse.info/en/programme-cycle/space/page/operational-peer-review>; <https://interagencystandingcommittee.org/the-emergency-directors-group>



**Interviewees routinely responded that such reflection around culture change is simply not a priority in time-poor and overstretched crisis contexts.** The quick answer is usually that we already have criteria for ranking where SEA risks are highest.<sup>11</sup> However, the absence of PSEA-preparedness and resources prevent rapid prioritisation even in well-funded programmes. We do not transfer the knowledge we have from context to context. Actors who move between contexts in the first phase of a crisis response – such as cluster leads or emergency teams – usually set the culture going forward. They may not see PSEA or prevention of sexual harassment as part of their responsibility, whereas it should have equal status alongside other quality programme areas such as protection, gender, disability.

Given that most real-time assessments conducted for humanitarian leadership do not consider organisational culture and its links to SEAH risk, nor the underlying causes of SEAH, the focus of this paper shifted to independent, published, SEAH investigation reports by IASC and SCHR members. These independent, published investigations were conducted following revelations that staff or partners had been found to have committed SEAH.

In reviewing the independent investigation reports for this paper, we consider what conclusions about humanitarian culture appeared systematically in the reports. What knowledge do we already have about the underlying causes of SEAH underreporting?

The independent reports we looked at contain reflections on organisational and sectoral culture. They repeatedly conclude that **having high-profile discussions about risk, power differentials, and trust is critical. They also called for better scrutiny of organisational barriers to reporting SEAH, and the challenges of adapting of PSEAH mechanisms across diverse contexts. All agreed that these steps will improve the effectiveness of PSEAH efforts.** The absence of these discussions and failing to set the appropriate organisational tone is noted in the investigations as significant. There is not yet any evidence to indicate that these reflections and recommendations are being prioritised by leaders and managers in scale-up.

*“Recent high-profile [crisis] responses have seen new agencies emerge, high numbers of volunteers, and retirees return to work. The PSEAH resources committed have not been fast enough or sufficient to work across the breadth of this risk.”*

**Interview with  
PSEAH expert**

*“I didn’t realise we weren’t talking about PSEAH [in my current job] until I was asked to do this interview. [In my previous job] there were cases that had a lot of media attention, so we all knew about the risks. I am working for the same organisation, but I haven’t heard the Country Director speak about it once. I’ve already been working here for six months.”*

**Interview with  
country-level Programme  
Manager**

<sup>11</sup> [Exploring an evidence-based analysis of SEA Risk Index | IASC / PSEA \(interagencystandingcommittee.org\)](#)



## Prevention is the cure

### C. Many humanitarian workers still believe in the “few bad apples”

Humanitarian actors always have power over the communities they seek to serve. As a sector, we are yet to fully accept that the very fact of delivering assistance, capacity building, meeting with people in authority reinforces and elevates the significant power we have in comparison to the communities we serve.

**The extreme vulnerability of individuals and communities we serve means that some practitioners will choose to abuse that power unless actively prevented from doing so.**

*“Organisations need to move away from understanding sexual misconduct as something individual staff perpetrate and see it as the product of the complex environments in which they work and address the causal and contextual factors that give rise to it.”*

**Jasmine-Kim Westendorf, Associate Professor and author**

(Source: <https://www.thenewhumanitarian.org/opinion/2020/10/06/sexual-abuse-aid-workers-again>)

We can often be blind to the power differentials which exist within our organisations which in themselves present an obstacle to speaking out. **As leaders, we do not always see the power we have endowed upon those we engage and employ; we often don't name it or recognise it.** We don't seek to analyse and understand what form that power may take in different contexts – social, status, access to information and data, economic to name a few. All of this means it is harder to identify the actions required to remove opportunities and temptation to abuse that power. **The very presence of our agencies in contexts where there are extremely vulnerable communities and individuals is influential. Our agencies are not neutral actors.**

Accepting this means more fully accepting that **zero tolerance to SEAH will not mean no cases.** We must stop claiming that this will be the case. **It can continue to be our vision – but not our target.** We must accept that we have a responsibility to reshape our working cultures to acknowledge and address gender and power imbalances and that the time and resources for this must be found.

We must also understand that **gender and power imbalances are so deeply embedded in our organisations – and not just in the contexts where we work – that one campaign or leadership speech will not suffice.** It also means retiring the misconception of “bad apples” whose actions “trigger organisational response”. We need to recognise – and possibly assume – that **attempts to abuse, exploit, and harass will likely occur in every response regardless of whether complaints are being received, and we must prepare accordingly.**

**The work undertaken by IASC members and by successive IASC PSEAH Champions to raise awareness of blind spots and to drive changes in our working culture is an excellent foundation for what should be a multi-year project requiring consistent renewal and reaffirmation.** If we are sincere about decolonisation and localisation of aid this presents another opportunity to reinvigorate commitments on PSEAH. We need to expect that, because of gender and power differentials in our work, abuse is happening in every context we work in. Interviewees suggest that we are still struggling to accept this – and to accept it about our colleagues, peers, subordinates, leaders. In addition, the more junior an interviewee, the clearer their view that we are not questioning ourselves and our assumptions.

*“If you want to challenge power, you have to challenge the power structures within your organisations. It’s only when you have leaders who are willing to say, ‘I know, and I’ve worked with this person for a really long time; I’m disgusted to learn about this behaviour, therefore I am terminating your contract.’ That is the kind of accountability that you need to see, but I think we don’t tend to challenge the really structural things and problematic issues about how we work as much as we should.”*

**Jeremy Konyndyk, former USAID Director**

(Source: <https://www.thenewhumanitarian.org/2018/03/23/humanitarian-metoo-moment-where-do-we-go-here>)

## Without the right funding, it’s all just pledges

### D. Commitments but still no predictable funding

When grey literature addresses the obstacles to placing PSEA, Gender-Based Violence, and Accountability to Affected Populations at the forefront of responses, it often acknowledges that these key components of protection are not consistently on the UN-led Humanitarian Country Team agenda. Consequently, **they are also neither sufficiently understood nor resourced.**

In our review of grey literature and investigative reports, we found that where these documents considered gender and the need to engage women-led organisations in operational design or advisory services, this issue was not specifically connected to strengthening PSEAH. Our interview subjects suggested that the staleness of humanitarian culture is perpetuated by a consistent lack of structured, engagement with women-led organisations, as well as insufficient gender parity and undiversified teams. **The need to ensure that women are involved in the design and implementation of programming to mitigate SEA risk has been raised by stakeholders**, such as Empowered Aid, and in reports, such as the investigations into allegations of sexual misconduct by WHO staff in DRC and the 2021 IASC Review on PSEAH.<sup>12</sup>

**Despite efforts, sustainable funding remains a challenge.** It is critical to recognise that if we are to drive measurable culture change across the sector and achieve the results discussed in this paper, additional capacity and financial resources are required. **It is low cost, but it is not free of charge.** Sustaining momentum over a multi-year process requires that these comparatively small collective resources are committed over the longer term. Official humanitarian assistance in 2022 was 40B USD, even 0.1% of this allocated to PSEAH would result in 40M USD, or enough for full time UN contracted inter-agency PSEA Coordinators in high-risk contexts plus budgets for PSEA activities.<sup>13</sup>

**Progress on funding within some IASC members is happening.** At an inter-agency level over the last decade, progress on resourcing can be tracked and there are success stories, in which all IASC members have played a part. UNICEF immediately releases funds for PSEAH upon the declaration of an organisational L-2 or L-3 emergency. Such examples are still the exception, with many individual IASC members not having specific budgets or budget codes, not being able to determine how much country offices spend on PSEAH, and not knowing what a minimum budget should contain.

<sup>12</sup> <https://www.who.int/news-room/events/detail/2021/09/28/default-calendar/publication-of-the-report-of-the-independent-commission-on-drc-sea-allegations>; <https://interagencystandingcommittee.org/iasc-champion-protection-sexual-exploitation-and-abuse-and-sexual-harassment/2021-iasc-external-review-pseash>; <https://empoweredaid.gwu.edu/>

<sup>13</sup> See Recommendation 7;

The IASC has endorsed recommendations for funding in the past, for example mandatory budget lines in appeals, and predictable funding is a central part of the 2022-26 IASC PSEAH Strategy.<sup>14</sup> However, **the IASC has made limited progress on commitments to undertake research on financing mechanisms and how to leverage resources for PSEA. There also is still a need to capture and socialise successful strategies for decisionmakers, and to determine model budgets for different contexts and key activities.**

## Momentum begets momentum

### *E. Keeping up the determination to change and communicate change*

The PSEAH experts we interviewed consistently reflected on a slowing of the post-2018 momentum, particularly regarding cultural and systemic change within our sector and organisations.

Our interviews concluded that this concern about a loss of traction in cultural change is valid. The IASC Review concluded that investments between 2017 and 2020 to support open dialogue and debate on change at the global level had been effective in driving IASC Principal collective consensus on the need for our culture to shift. Any such shift requires consistency and reinforcement. Since the pandemic, there have been a series of major global crises requiring new sustained responses and increasing financing pressures. There has been no SEAH event on the scale of Haiti (2018) or DRC (2020) to draw focus. Less visibility has meant less leadership attention. Experts feel the momentum has been lost at the global level. Many experts also identified the frequent leadership changes among IASC Principals and a renewed focus on Diversity and Inclusion (DI), as well as anti-racism policy drives as contributing to a reduced focus on PSEAH. **Some experts observed that it appears as though our sector can only engage with these fundamental issues if they are siloed, or simplified, or reduced to a series of technical activities, as opposed to us embracing all of them as a collective cultural perspective shift.**

*“At the global inter-agency level, we were starting to talk about systemic issues to which there is no easy answer, then there was a renewed focus on the DI issue, and it felt as though there was only bandwidth for one such issue at a time. We need to start again, not from the beginning but [by] taking a step back. Within my own organisation, [I’m] not getting the access to leadership that I had in 2018-2019.”*

**Global PSEAH expert**

As a sector, we haven’t yet overcome the barriers to speaking confidently and openly about SEAH and power differentials. **Interviewees feared that the increasing funding crisis may drive IASC members back to risk aversion, fearing a perceived ‘transparency penalty’.** By now, it should be clear that effective PSEAH efforts will increase SEAH reports, and we should be prepared for this. **Promoting and rewarding managers and staff who openly discuss and address SEAH should be a career-enhancing move.** We already have models to draw upon to promote such cultural change; to encourage PSEAH and deter SEAH, we must apply these models more widely.<sup>15</sup>

*“Self-censorship by the aid community and members of the affected population is on the increase, and there is widespread fear to report any type of protection incident.”*

**Extract from Afghanistan OPR Mission Report (2022)**

<sup>14</sup> <https://interagencystandingcommittee.org/iasc-champion-protection-sexual-exploitation-and-abuse-and-sexual-harassment/2021-iasc-external-review-pseash>

<sup>15</sup> [https://safeguardingsupporthub.org/sites/default/files/documents/Bitesize\\_Learning\\_from\\_RSH\\_Nigeria%E2%80%99s\\_Safe\\_organisational\\_culture\\_mentoring\\_pilot\\_programme.pdf](https://safeguardingsupporthub.org/sites/default/files/documents/Bitesize_Learning_from_RSH_Nigeria%E2%80%99s_Safe_organisational_culture_mentoring_pilot_programme.pdf)

# RECOMMENDATIONS

- 1. COMMUNICATION** IASC members should consider whether they are communicating clearly and transparently on progress being made. New, appropriate, ways to communicate progress and change with staff and stakeholders should be discussed. This should include considering whether current mechanisms to receive feedback on obstacles to change are effective.

IASC agencies should conduct a myth-busting campaign with plain language, simple sentence statements that come from the leadership.

Leaders must accept that they will need to prioritise PSEAH for the duration of their tenure, if they wish to deliver real change. Leaders must commit to making time and space to speak openly about their own commitment to zero-tolerance to inaction on PSEAH and invite feedback during every visit to meet operational staff.

- 2. CULTURE CHANGE** There needs to be an organisational culture shift, which is alert to the risk of SEAH. This cultural shift should be central to every new humanitarian scale-up and its maintenance should be monitored in every protracted response.

Leaders can consider how to better **embed PSEAH within preparedness and scale-up**, ensuring that dialogue and learning happens **before** deployments take place and that appropriate considerations are made alongside localised preparedness planning.

**IASC members should seek to understand what aspects of their organisational cultures are preventing or hindering SEAH reporting**, agree on the minimum acceptable number of complaints, and agree on what to do when this minimum number is not reached. This approach requires consideration of the factors contributing to this minimum number of complaints and underreporting, such as the size of organisation, the type of programming, the delivery mechanism, and context.

There are many lessons and recommendations drawn from the independent investigations/evaluations which refer to the importance of promoting an organisational culture that facilitates PSEA activity, and how this culture can be more effectively introduced into current responses. All IASC members can benefit from reviewing these recommendations and look into ways of implementing them into their own organisations.

PSEAH professionals should also consider how lessons from independent investigations and evaluations can be captured and presented to country-level leaders and managers. Practically, **better scrutiny of organisational barriers to reporting SEAH, and adapting of PSEAH mechanisms within individual responses is recommended**.

- 3. FOLLOW BEST PRACTICE** The IASC must review previous initiatives intended to motivate cultural change within member agencies to understand what has been effective, why it was effective, what resources it required, and whether it is replicable. This could start with following up on the examples detailed in the [2021 IASC Promising Practices Organizational Culture | UNHCR](#).

Leaders could commission a follow-up study and provide a platform for sharing of new initiatives. The focus should be upon understanding the elements that ensured difference and change but also why some initiatives faded.

4. **LEARN THE TOUGH LESSONS** Leaders will strengthen their own learning by accepting that individual, organisational investigations and evaluation reports will contain lessons that should be considered as a reflection of our collective culture. This should especially be the case when these reflections relate to power dynamics, the humanitarian culture, and the actions of all humanitarians. IASC members should have the confidence to share such lessons as part of collective learning and accountability.
5. **NO NEWS IS BAD NEWS** IASC agencies and member organisations must be emphatic in ensuring country-level leaders and managers understand that **increased reporting is a sign that systems are working**. In future, **low reporting should trigger organisational scrutiny**. Managers should be required to explain why they believe reporting numbers are low, and valued where they are demonstrating that they are welcoming reports. Managers should be encouraged to ensure that expertise is available to rigorously check if rumours have substance.

**IASC members should be seeking to understand what aspects of their organisational cultures are preventing action and/or increased reporting.** There should be agreement on the minimum acceptable number of complaints (according to context/response) and the appropriate action when this minimum number is not reached/reported.

Leaders should commit to asking which of their operations and programmes have no SEAH reports and following up to understand why this is the case. **Leaders should clearly communicate that an absence of reports is a red flag.**

IASC Principals must urgently look into why SEAH reporting out of the Ukraine crisis has apparently been so low, as this is a highly visible case study. It is essential for IASC agencies and the wider humanitarian ecosystem to find answers, as opposed to waiting for media reports and the resulting reputational harm to organisations, responses, and ultimately all stakeholders. An inter-agency mission to address barriers to reporting is warranted.

6. **CHECK THE NUMBERS** IASC members should consider if there is a difference between the trajectory of SEA and sexual harassment (SH) complaints in various contexts and, if this is the case, what the reasons could be. Are there lessons to be applied?

Leaders could request the IASC Secretariat and the CEB taskforce to conduct and present analysis on this issue, as well as upon the resources committed to SEA and SH by IASC members (should the latter be made available). This analysis could bring forward important learnings on how to address culture issues.

7. **BUDGET FOR PERMANENT CHANGE** IASC members must determine the minimum budget required to ensure effective PSEA at country level and consider realistic financing models. This minimum budget would include: leadership time; adequate provision in job descriptions for focal points to meet their responsibilities; training; awareness-raising; partner training; community engagement; and complaints mechanisms. Good models for resourcing exist and should be promoted but, currently, advocacy for financial support lacks the necessary analysis and supporting data. Effective PSEAH is cost-effective, but we do not have the evidence to make the case.
8. **UPDATE JOB DESCRIPTIONS AND PERFORMANCE APPRAISALS** IASC members should explicitly include values and culture in both job descriptions and performance appraisals, and to recruit according to stated and demonstrated values.