



Iraq

Standard Operating Procedures for Recording and Processing Sexual Exploitation and Abuse Complaints by the Inter-Agency PSEA Network

The United Nations has a **zero-tolerance policy** toward Sexual Exploitation and Abuse (SEA).

These Standard Operating Procedures (SOPs) define measures to be taken when there is suspected or alleged Sexual Exploitation and Abuse (SEA) committed by humanitarian/development actors, which include UN Agencies/missions and partner INGO/NGOs, as well as non-UN affiliates, including law enforcement actors in Iraq. It outlines a standardized approach for recording and referral of all complaints received (via any complaint and feedback channel), implementing [Secretary-General's Bulletin ST/SGB/2003/13](#) on "Special measures for Protection from Sexual Exploitation and Sexual Abuse (PSEA)" (9 October 2003). Additionally, the SOPs provide information on assistance to survivors and key principles to keep in mind when recording and processing complaints.

These SOPs supersede any earlier SOPs or directives in relation to recording and processing SEA complaints by the PSEA Network in Iraq. Procedures related to sexual harassment of staff members are not included in these SOPs; more information on preventing and addressing sexual harassment and other forms of sexual misconduct can be found on the dedicated [IASC PSEA website](#).

1. Definitions

1.1 Complaint

A "complaint" is any expression or report of any alleged misconduct or wrongdoing by UN staff, partner staff, or any humanitarian/development actors, even if unaffiliated with the UN.

1.2 Sexual Misconduct

- **Sexual Exploitation:** Any actual or attempted abuse of position of vulnerability, differential power, or trust, for sexual purposes, including but not limited to profiting monetarily, socially, or politically from sexual exploitation of beneficiaries.
- **Sexual Abuse:** Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- **All sexual activity with a child** (under age 18) regardless of consent or local age of majority. Mistaken belief as to age is never an excuse.

1.3 Humanitarian/Development actors

- **UN agencies/missions:** Any sexual misconduct allegedly committed by an individual or group working for a UN agency/mission in Iraq.
- **Partners and contractors:** Any sexual misconduct allegedly committed by an individual or group working for INGO/NGO partnering/contracting with a UN agency/mission in Iraq.
- **Actors not affiliated with the UN:** Any sexual misconduct allegedly committed by an individual or group working for an INGO/NGO not affiliated with the UN but providing humanitarian and/or development assistance/programmes, as well as any individual or group associated with the international community, including but not limited to donors, diplomatic community, charity organizations, human rights entities, etc.
- **Law enforcement:** Any sexual misconduct allegedly committed by an individual or group working for or representing civilian or non-civilian authorities to provide or facilitate the provision of humanitarian and/or development assistance/programmes.



2. PSEA Network

2.1 Key principles

- **Programme criticality:** In the context of prevention and response to SEA, addressing allegations and complaints received by the Network may be qualified as a PC1 activity, and ensuring the effective implementation of Complaint and Feedback Mechanisms (CFM) should be prioritized in programming and practice.
- **Obligation to report.** All humanitarian/development actors have an obligation to receive and report suspicions of SEA.
- **Protection from retaliation:** All actors who report SEA are protected from retaliation.

2.2 Roles and Responsibilities

2.2.1 Overview of the PSEA Network

In 2016, the Resident Coordinator/Humanitarian Coordinator (RC/HC) for Iraq established the inter-agency Iraq Protection from SEA Network (PSEA Network) to implement the Secretary-General's *Bulletin on Special Measures for PSEA* and promote accountability to affected populations.

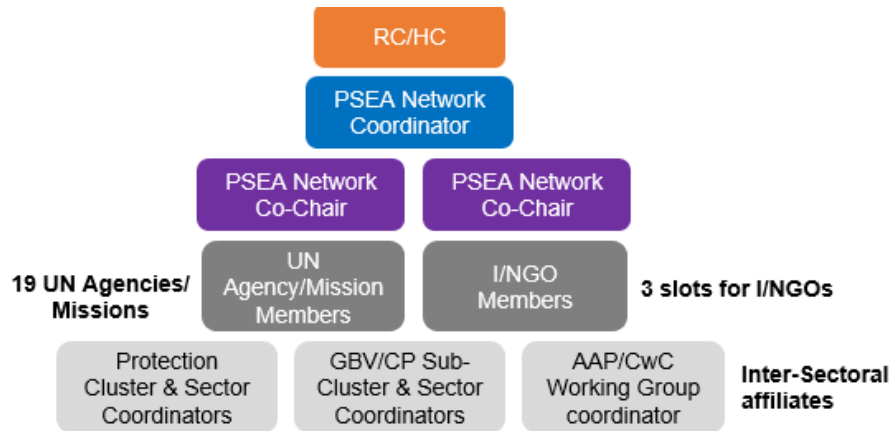
- **Independence.** The Network serves as an independent inter-agency body for PSEA coordination and oversight, referral of complaints, establishment and review of policies/guidance, and implementation of the *2021 PSEA Action Plan Priorities for Iraq*, endorsed by the UN Country Team. It organizes training and awareness raising to reduce risks and mitigate the effects of violations.

2.2.2 Accountability structure. The architecture of the PSEA Network is summarized below:

- **RC/HC:** The Network is supported by regular RC/HC oversight. The RC/HC engages in monitoring, discussion, and feedback to overall efforts and implementation by the PSEA Coordinator.
- **PSEA Coordinator:** Under supervision of the RC/HC, the Coordinator is responsible for overseeing and supporting PSEA activities of all affiliated organizations in Iraq. The Coordinator:
 - Regularly reports to the RC/HC and works closely with PSEA Network Co-Chairs.
 - Supports Network members to establish and maintain an inter-agency community-based complaints mechanism (CBCM) by: linking the CFM of Network members through agreed referral pathways; establishing new complaint channels where reporting gaps are identified; and building capacity of all persons that operate complaint channels on the inter-agency referral protocols.
 - Attends the Iraq Accountability to Affected Population (AAP)/Communication with Communities (CwC) Working Group, the IASC PSEA meetings, and meetings chaired by the Development Support Office (DSO) on PSEA.
- **PSEA Co-Chairs:** Two designated co-chairs support the Coordinator in the above functions. Since 2020, the PSEA Network has been co-chaired by designated staff from UNHCR and UNICEF.¹
- **Network Members:** Membership includes Focal Points from each of the 19 UN Agencies/Missions operating in Iraq² and 3 seats for I/NGOs in line with an agreed election and representation structure. Each member is obliged to mainstream this SOP and all relevant PSEA Network guidance and principles into their respective agency/mission/organization programming. Only designated Focal Points can represent and make decisions as part of the Network.
- **Affiliates:** Coordinators from the National Protection Cluster, the GBV and child protection sub-Clusters, and the AAP/CwC Working Group are also invited to attend PSEA Network meetings.

¹ However, the co-chair roles could be held by different agencies in the future, pending availability.

² FAO, ILO, IOM, UNAMI/OHCHR, UNDP, UNDSS, UNESCO, UNFPA, UNHABITAT, UNHCR, UNICEF, UNITAD, UNMAS, UNOCHA, UNODC, UNOPS, UNWOMEN, WFP, WHO.



3. Recording and Processing of SEA complaints

3.1 Key Principles

- **Duty to report.** Humanitarian/development actors always have a duty to report allegations of SEA that they become aware of, even if a survivor wishes to remain anonymous or does not wish to formally lodge a complaint.
- **Confidentiality, timeliness, “Do No Harm”:** In all circumstances, whether through dedicated CFM or other communication channels, humanitarian/development actors should abide by principles of confidentiality, timeliness, and “Do No Harm”³ when handling, recording, referring, and resolving SEA complaints and feedback. This should include due consideration for survivor safety and dignity.
- **Proactivity.** Humanitarian/development actors should proactively raise awareness about available CFM and provide instructions on how to lodge complaints.
- **Accountability.** Awareness-raising materials should adhere to agency/organization branding and logos, incorporating partner logos as relevant, to enhance consistency, transparency, and trust.
- **Data protection.** Confidentiality is critical in all handling of personal data, including password protection of files and limited dissemination.

3.2 Complaint Mechanisms

- The PSEA Network **standard SEA complaint form**⁴ can be used by humanitarian/development actors for referring SEA complaints. Use of this form is not mandatory but serves to harmonize information collected for the complaint. Prior to recording, a complainant should be informed of the mandatory reporting and confidentiality policy for humanitarian/development actors.
- **Submission via PSEA confidential email address:** if an incident involves other humanitarian/development organization (UN Agencies/Missions/I/NGO/NGO) or authorities (civilian or non-civilian), reports should be made to the PSEA Network’s dedicated and confidential email (Iraq-psea@un.org), for further coordination with relevant actors and processing of the complaint.
- **Submission via Iraq Information Center (IIC):** Any beneficiary or member of the host community can make a complaint on behalf of themselves or someone else through the confidential hotline offered by the Iraq Information Center (IIC) where operators have been specifically trained for onward referral. This call is toll-free within Iraq, and the number is: **80069999**.

3.3 Recording complaints

Upon receipt of a complaint, the Network Coordinator will acknowledge receipt and record it using an excel spreadsheet or similar common tracking/recording methodology that is password protected and only accessible by the Coordinator.

³ The principle of “Do No Harm” is broadly defined as ensuring that humanitarian/development actors ensure that they prevent and mitigate and negative impact of their actions on affected populations.

⁴ A copy of the standard SEA complaint form, and a flowchart of the process, is included with these SOPs.



3.4 Processing complaints

Complaints received are referred to relevant entities that are accountable within 36 hours where possible. Referral of complaints in all instances should take the safety of the survivor into consideration and survivors/witnesses should be protected from retaliation. The PSEA Coordinator will follow-up on all complaints and referrals on an ongoing basis for quality assurance.

A referral of an allegation by the PSEA Network is **not** a determination of SEA or misconduct. The PSEA Network does not presume guilt in the absence of a conclusion following an investigation conducted by the concerned organization.

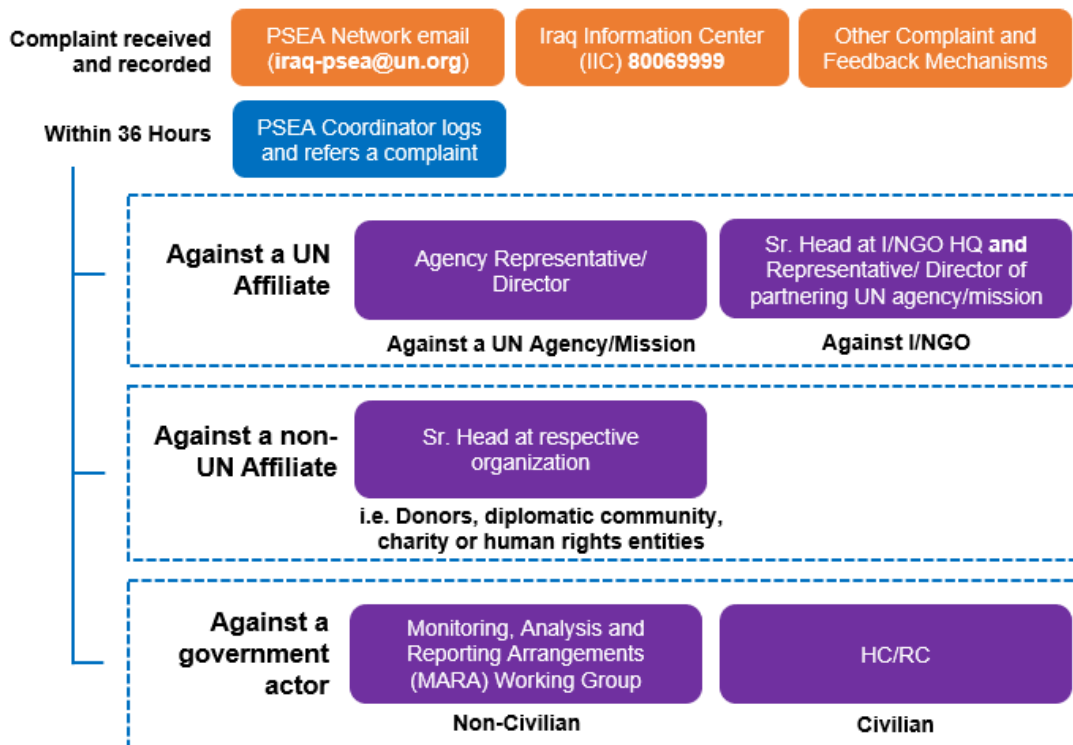
3.4.1 Complaints against UN Agencies/Missions: Complaints involving UN agencies/missions are systematically referred to the Representative/Director of the UN agency/mission in Iraq. When the complaint directly involves a head of agency/mission, the Network Coordinator refers the complaint to the ethics/investigation office of the concerned agency/mission.

3.4.2 Complaints against NGOs/INGOs affiliated with the UN: Complaints involving NGOs/INGOs implementing partners are referred to the most senior person at the respective HQ and the UN partnering agency/mission for further action. Where referral of SEA complaints to the involved NGOs/INGOs may put the safety of a survivor and/or witness at risk, complaints may be raised to the funding/partnering agency only.

3.4.3 Complaints against actors unaffiliated with the UN: Complaints involving an actor not affiliated with the UN but providing humanitarian and/or development assistance/programmes including *inter alia* donors, the diplomatic community, charity organizations, and/or human rights entities are referred to the most senior relevant person within the involved organization.

3.4.4 Complaints against government actors:

- **Complaints against non-civilian governmental actors** are referred to the Monitoring, Analysis and Reporting Arrangements (MARA) Working Group. In certain instances, Network members may be required to consult with relevant HQ entities for specific situations.
- **Complaints against civilian governmental actors** are referred to the RC/HC for follow up with the Iraqi authorities.





3.5 Investigating complaints

- **Responsibility to investigate:** Final responsibility for addressing and investigating a complaint, including taking any necessary disciplinary action, lies with individual concerned organization in line with its internal policy and procedures.
- **Role of the PSEA Network.** The role of the PSEA Network is limited to receiving, logging, referring and following-up with the concerned organization on the investigation. The PSEA Network can inquire and collect additional preliminary information but should not conduct or oversee the investigation.
- **Key principles:** An investigative process is expected to adhere to the principles of objectivity, impartiality, and fairness. It should be conducted competently, in accordance with the victim-centered approach and with the highest levels of integrity. Efforts should be made to protect a complainant's rights to ensure a compassionate, sensitive and non-judgmental investigative process.
- **Findings:** Individual organizations are encouraged to share their investigative report with the PSEA Network, regardless of findings.

4. Assistance to Survivors

4.1 Key principles

- **Independence:** The provision of assistance to survivors is **never** linked to the nature of a report or outcome of an investigation.
- **Confidentiality:** All survivors are entitled to safe and confidential assistance.
- **Referral:** All survivors should be immediately referred to relevant GBV and/or CP service providers upon their consent. The PSEA Coordinator should refer a survivor to a trusted service provider within 24 hours.

5. Adaptation and Learning

5.1 Quarterly Data Review and Analysis

On a quarterly basis, anonymized countrywide data will be collated and analyzed by the PSEA Coordination Team for trends in demographics and types of complaints/feedback etc.

- Relevant findings will be shared with the RC/HC.

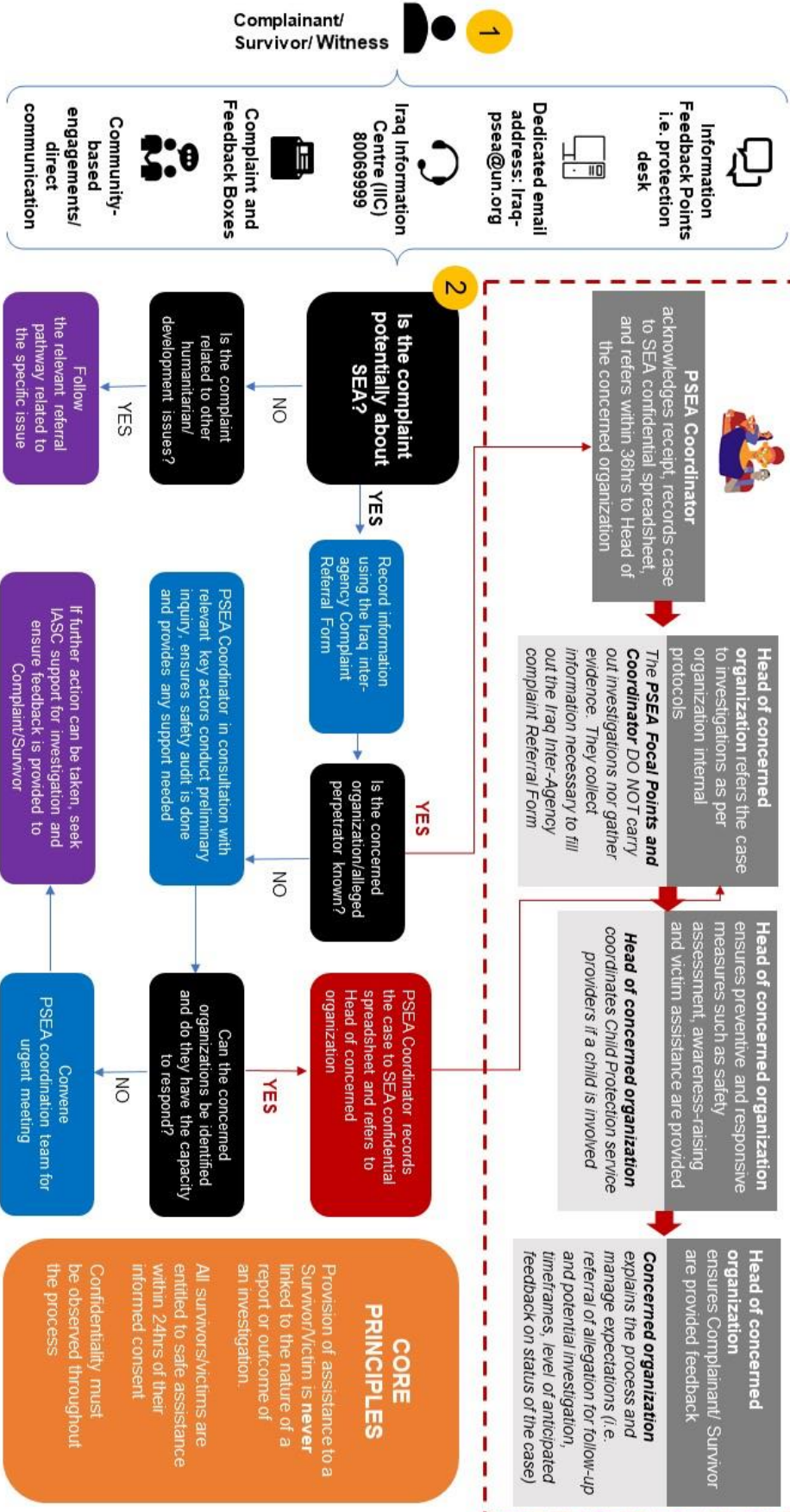
For more information, visit the Iraq PSEA Network page:
<https://psea.interagencystandingcommittee.org/location/middle-east-and-north-africa/iraq>



INTER-AGENCY COMPLAINTS REFERRAL FORM (SEXUAL EXPLOITATION AND ABUSE)		
Information in this form is CONFIDENTIAL. All Forms must be PASSWORD PROTECTED. Submit this form to the Iraq PSEA Network Confidential email: Iraq-psea@un.org		
Name of Complainant:		Nationality:
Address (district/street/city, or camp sector & tent/caravan no.):		Contact details (phone/email):
Age:		Gender:
How does complainant prefer to be contacted (<i>Give details. If a phone, include any person (i.e. spouse) who may have access to it</i>):	Preferred time of day for contact (day/night)	Preferred language
Name of survivor (and nickname)*: <i>(if not the complainant)</i>		Nationality:
Address:		Contact details:
Age:	If under 18: <input type="checkbox"/> With family <input type="checkbox"/> Unaccompanied <input type="checkbox"/> Separated	Gender:
Name(s) and address of parent/guardian, if under 18:		
How does complainant prefer to be contacted (Check relevant box(s) and give details): <input type="checkbox"/> Phone <input type="checkbox"/> Email <input type="checkbox"/> Via family <input type="checkbox"/> Other		
Has the survivor given consent to the completion of this form and referral? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know		
Any urgent needs identified for the survivor/complainant including safety concerns? Please explain.		
Date of incident(s):	Time of incident(s):	Location of incident(s):
Description of incident(s) in the words of the survivor/complainant:		
Name (and nickname) of alleged perpetrator (person):		
Name of the humanitarian/development entity the alleged perpetrator belongs to:		
Position/Job title of perpetrator:		
Type of the entity (please select): Choose an item.		Other:
Address or location of the entity:		
Has the survivor been referred to an organization for assistance (give details on organization and services provided):		
Any other information/details:		
Report completed by:		
Date:		



PSEA Iraq Process Flow





Core Principles of Sexual Exploitation and Abuse (SEA)

1 No Second Chances

SEA constitutes acts of gross misconduct and are grounds for termination of employment

2 No Sex with Children

Any sexual activity with children (<age 18) is strictly prohibited

3 Do not hire or bribe anyone for sex

Exchange of money, employment, goods, or services for sex is prohibited, including hiring and soliciting commercial sex workers

4 No Sex with Beneficiaries

Any sexual relationship with beneficiaries involving improper use of rank or position is prohibited

5 Always report SEA

Humanitarian/Development workers **must** report any concerns of SEA by a fellow aid worker regardless of affiliation to Iraq-psea@un.org

6 Discourage SEA around you

Humanitarian/Development workers must create and maintain an environment free from SEA and promote their Code of Conduct



For more information, contact the Iraq PSEA Network (Iraq-psea@un.org)

