



الأمم المتحدة – العراق
United Nations Iraq



SAYING **NO**
TO SEXUAL
MISCONDUCT

UN IRAQ protocol for sharing sensitive information regarding Sexual Abuse and Exploitation

1. Introduction

Sexual Exploitation¹ and Abuse² (SEA) committed by humanitarian or development workers is a serious breach of UN and partners' code of conduct. SEA symbolizes failure of aid workers to protect the people they are obligated to serve. It is a sensitive issue that needs to be handled with care to ensure no further harm is perpetuated to the survivor. Additionally, SEA allegations can subject both survivor(s) and alleged perpetrator(s) to further harm. Moreover, if SEA information is not handled carefully and leaks to unintended persons, it can also damage the reputation of the organization(s) providing assistance to affected communities.

2. Purpose

This information sharing protocol applies to UN agencies and implementing partners with the objective to guide and describe procedures for sharing anonymous SEA data and information within³ and outside the organizations (outside implies to donors etc). This protocol is meant to facilitate the information sharing between members of the Iraq PSEA network and its implementing partners (whilst ensuring dignity and safety of SEA survivor is observed).

¹ is 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.

² is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

³ implies allegations that are received by the concerned UN agency/IPs directly without going through the Iraq inter-agency email (IRAQ -PSEA@un.org) ;hence slipping off the attention of the PSEA Coordinator/DSRSG/HC/RC office.

3. Through this protocol, UN agencies and partners recognize that sharing and receiving non-identifiable data on suspected and/or reported cases of SEA will contribute towards improved inter-agency coordination, identifying and targeting gaps, prioritization of prevention/response actions and improved programming of prevention and response efforts. It may also result in improved advocacy efforts, increased leverage for fundraising and resource mobilization, and improved monitoring. All agencies will protect information and ensure that data is shared on a need-to-know basis so that involved parties are not exposed to further harm.

4. Rules for sharing of data

In line with the IRAQ SOPs for receiving and processing SEA complaints and Iraq inter-agency PSEA process flow chart, all agencies should notify the UN DSRSG/HC/RC and PSEA Coordinator in a timely fashion about SEA allegations received and actions taken.

- The SEA data to be shared by the organization that has employed the alleged perpetrator (if the case is not reported directly through the PSEA inter-agency email (Iraq-psea@un.org) or the free inter-agency hotline number- 80069999) should include location (such as IDP camps) where the incident took place, organization that has employed the alleged perpetrator, and action taken. The data will be shared in a format that is password protected with password only privy to the PSEA Coordinator and the DSRSG/HC/RC.
- When UN implementing partners (NGOs including government as an implementing partner) receive SEA allegations directly through their complaint reporting mechanisms, they are supposed to notify the UN agency that they have contractual agreement with. Then the concerned UN agency should inform the office of DSRSG/HC/RC/ and the PSEA Coordinator about the incidents and follow-up actions taken.
- Similarly, in situations where SEA incidents are received through individual agencies' complaint reporting mechanisms, UN agencies via their PSEA Focal Points will notify the PSEA Coordinator who in turn shall inform the DSRSG/HC/RC on allegations involving their staff, UNVs, and contractors. The allegations will be consolidated and reviewed to avoid double counting.
- All signatories agree that the SEA data shared will not be used for follow up by the Iraq PSEA Network on individual cases of a reporting organization. This is the responsibility of the organization that has employed the alleged perpetrator.
- All agencies will follow strict data protection protocols to ensure that no harm is caused to any survivor , alleged perpetrator, whistleblower, service provider, or the community from information sharing efforts.
- Each Iraq PSEA Network Member reserves the right to share its own data externally, (for example for internal and/or donor reporting requirements, in line with individual agency protocols or contractual agreements). Even when using its own data externally, each Iraq PSEA Network member is expected to do this in a responsible manner that maintains the safety and security of SEA survivors, service providers and their communities. Each member of the Iraq PSEA network may

suspend the sharing of information for reasons of safety, security, capacity or other considerations through communication to the office of the DSRSG/HC/RC.

- For security purposes and to ensure survivor confidentiality, no survivor-specific information which can lead to identification of the survivor will be shared, e.g., name, initials, address, phone number, etc. All information shared will be anonymous statistical data.
- Following approval of the protocol, Iraq PSEA network members (PSEA Focal Points) should share the standards and procedures outlined in this information sharing protocol with relevant parties within their organization.

5. Data Security

The DSRSG/HC/RC through the PSEA Coordinator and all Iraq PSEA Network members will ensure that all data is safe and secure and will implement appropriate procedures to maintain confidentiality of the data. UN Implementing Partners through the respective UN agencies shall submit data via a password⁴ protected format to the PSEA Coordinator who shall consolidate and share with DSRSG/HC/RC.

6. Monthly Reports

1. Frequency: Signatories to this information sharing protocol will on a monthly basis submit information regarding allegations, the status of the provision of survivor assistance and the status of the internal investigations with the PSEA Coordinator and the office of the DSRSG/HC/RC.
2. The PSEA Coordinator will consolidate all submitted information and create an aggregate monthly report and share with DSRSG/HC/RC.
3. The Iraq PSEA Network will discuss trends in the monthly Network meetings with an aim to promote advocacy and improvement of prevention and response mechanisms.

7. When other parties request information on SEA

A. Internal and Donor Reporting

The DSRSG/HC/RC Office and members of the Iraq PSEA Network are authorized to use their own individual statistics on reported SEA incidents for their internal and donor reporting requirements.

When sharing data for their internal reporting requirements, organizations and agencies should maintain data protection standards of confidentiality and security. In that purpose they should send the following caveat along with the SEA statistics:

The data shared is only from reported cases, and is in no way representative of the total incidence or prevalence of Sexual Exploitation and Abuse in Iraq. These statistical trends are generated exclusively by members of the IRAQ PSEA Network

⁴ Password to be revealed only to the PSEA Coordinator

who deliver aid support across Iraq. This data should not be used for direct follow-up with survivors or organizations for additional case follow-up. The following information should not be shared outside your organization/agency. Failure to comply with the above will result in the suspension of sharing SEA statistics in the future.

The media is not included as a pre-approved point for information and data sharing as context and security situations can change rapidly. Media requests should be handled by agencies and the DSRSG/HC/RC office on a case by case basis and in a transparent manner.

B. Sharing data to Non-Iraq PSEA Network Members

Each time external agencies or actors that are not signatories of this protocol submit a request for any other consolidated SEA data, the PSEA Coordinator in consultation with DSRSG/HC/RC, will issue a written request to each of the data gathering organizations for authorization to share aggregate consolidated data. Each request for authorization to share consolidated SEA data will specify:

- The reason/purpose for the request for information;
- What the information will be used for;
- How the information will be used;
- How the information produced with the consolidated data and analysis will be fed back to the data gathering organizations, and
- A written guarantee by the receiving party to not disseminate the report to any other party or utilize it for any purpose beyond that which was requested and authorized.

If Iraq PSEA Network Members (other than the DSRSG/HC/RC Office) receive requests from external agencies or actors (who are not signatory to this protocol or members of the UN family, they should inform and send this request to the PSEA Coordinator so that the appropriate action is taken.

When a request for authorization to share, data is submitted to the PSEA Coordinator:

1. The PSEA Coordinator will send the request via email to both the primary and secondary PSEA focal points of each organization with a copy of the Head of Agency of the concerned organization.
2. If no response is received from the organizations' focal points, the PSEA Coordinator will follow up with the senior management of the non-responsive organization(s). If no response is received from the senior management after 5 business days, it does not imply automatic authorization to share the data externally.

3. If after following the above steps, the organization(s) has/have still failed to provide feedback, PSEA Coordinator will contact those organizations who have already provided their authorization and ask them whether they agree to share the aggregated data excluding the data collected by one (or more) signatories that is/are not responding to the request.
4. If all organizations still agree to data sharing, then data will be shared excluding the data collected/compiled by the non-responsive organization(s).

The PSEA Coordinator will remove all data gathering organizations' identifying information.

A party that has been authorized to receive consolidated SEA data must agree not to disseminate the information to any other sources in the written request they submit to the PSEA Coordinator. The party has to direct any requests they receive for access to this shared data to the PSEA Coordinator, who will consult with the DSRSG/RC/HC for final approval.

When written authorization for external data sharing is attained from DSRSG/HC/RC, the PSEA Coordinator will share the data along with the following relevant caveats in writing:

1. The data is only from *reported cases*. The consolidated data is in no way representative of the total incidence or prevalence of SEA in any one location or group of locations. Sufficient explanation of limitations on reported cases and trends in reporting should be properly highlighted in any external communication after permission is received from contributing agencies. This information is confidential and cannot be reproduced without the authorization of the Iraq PSEA Network Members.
2. The aggregate data is based on non-identifiable data submitted from Iraq PSEA Network Members for the purposes of:
 - SEA prevention and response program planning, monitoring and evaluation by the DSRSG/HC/RC Office, UN agencies and implementing partners.
 - Identification of programming and service delivery gaps.
 - Prioritization of actions and next steps.
 - Improved service delivery.
 - Policy and advocacy.
 - Resource mobilization.
3. The data shared should be accompanied by the caveat in page 2, which reads "*The data shared is only from reported cases and is in no way representative of the total incidence or prevalence of Sexual Exploitation and Abuse in IRAQ. These statistical trends are generated exclusively by members of the Iraq PSEA network who deliver development and humanitarian support across Iraq. This data should*

not be used for direct follow-up with survivors or organizations for additional case follow-up. The following information should not be shared outside your organization/agency. Failure to comply with the above will result in the suspension of sharing SEA statistics in the future”.

8. Time Limit

This information sharing protocol will take effect as of the time of approval and will be reviewed annually.

9. Breaches

In cases of breach by any of those participating in this information sharing protocol, Iraq PSEA Network Members will be informed in writing within one week of the breach, and the topic will be added to the agenda of the next Iraq PSEA Network meeting to discuss the matter and to determine appropriate action to be taken. If a resolution cannot be reached, then the following process should be undertaken:

- A meeting will be convened with Heads of Agencies from all Iraq PSEA Network Members to discuss the matter and to determine appropriate action to be taken within one (1) week.
- If unresolved, the matter should be referred to the DSRSG/HC/RC within two (2) weeks of the breach or suspected breach.

This resolution process should not impact regular information sharing if the breach is resolved.

Data gathering organizations reserve the right to stop sharing data if the information sharing protocol is breached and will inform PSEA Coordinator in writing with the reasons for stopping the flow of data. While the matter is being resolved, and if the DSRSG/HC/RC Office is not involved, it is recommended that data gathering organizations continue to share data with PSEA Coordinator to inform field level activities (i.e. programming and service delivery gaps). The SEA consolidated information will not be shared externally until the breach is resolved.

The resolution of a breach or suspected breach must be agreed to by all organizations who are signatories to this protocol. If the resolution cannot be agreed upon, signatories have the option to terminate, in writing⁵, their inclusion in the protocol and the protocol will be revised accordingly.

Approved/endorsed by UNCT on 31st January 2022

⁵ The individual who signed the information sharing protocol would communicate the organization's withdrawal.