HIGH-LEVEL ROUND TABLE DISCUSSION ON THE EXTERNAL REVIEW ON PROTECTION FROM SEXUAL EXPLOITATION AND ABUSE AND SEXUAL HARASSMENT

23 NOVEMBER 2021, GENEVA

REPORT – OPEN SESSION

UNFPA Executive Director and PSEA Champion, Dr. Natalia Kanem, Cox’s Bazar, Bangladesh Credit: UNFPA
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**Introduction**

“Let’s all be champions of protection and place the rights and dignity of victims and survivors at the heart of our efforts.” — Dr. Natalia Kanem, UNFPA Executive Director.

In January 2021, UNFPA Executive Director Dr. Natalia Kanem assumed the Inter-Agency Standing Committee (IASC) Championship on Protection from Sexual Exploitation and Abuse and Sexual Harassment (PSEAH) from Mr. Filippo Grandi, UN High Commissioner for Refugees.

In March 2021 the IASC reaffirmed their commitment to a vision of a humanitarian environment where people in crises can access protection and assistance without fear of exploitation or abuse by any aid worker. In their PSEAH Strategy and related Acceleration Plan, IASC Champions set key strategic objectives and priorities to address sexual exploitation and abuse and sexual harassment.

In furthering these objectives and in building on the work of previous Champions, UNFPA will focus on strengthening a victim-centred approach to preventing and addressing sexual wrongdoing. Dr. Kanem’s Championship has three core priorities as follows:

1. **Bolster PSEA country mechanisms**
   Leadership, accountability, and coordination are fundamental in order to prevent and respond to sexual exploitation and abuse on the ground. Inter-agency PSEA networks, led by dedicated inter-agency coordinators, have proven to be effective mechanisms to champion efforts to address SEA in-country.

2. **Access to quality information and assistance**
   Humanitarian actors have a fundamental responsibility to ensure victims of SEA have access to timely, quality and survivor-centred assistance offered through specialized gender-based violence (GBV) support services. GBV case management services constitute a critical and life-saving primary entry point for survivors of GBV, including SEA, to receive immediate and longer-term support. This requires sustained investment in assistance to ensure that services meet the unique needs of survivors of GBV, including SEA, on the ground.

3. **Strengthen coordination and coherence**
   Inter-agency cooperation forms the backbone of all PSEAH work. An effective and structured response must bring together a range of actors from within and outside the United Nations system, including civil society, affected communities and governments. It is critical that these groups are at the table to promote a truly victim-centred approach to PSEAH.

The commissioning of an external review of the IASC’s collective progress on PSEAH over the past decade was a key action undertaken to deliver upon these Championship priorities. The round table documented in this report provided an opportunity for IASC leaders and key stakeholders to discuss the progress detailed in the Review, to identify opportunities for course correction, and to commit to a collective way forward to ensure sustainable investment in what has demonstrated impact.

The event began with a closed-door session for IASC leaders followed by a plenary discussion which included key stakeholders.
Open Session: 2021 Championship and charting a collective way forward

In this session IASC leaders, representatives of member states and civil society were invited to collectively take stock, reflect on remaining gaps, and propose priorities for a collective way forward.

Moderator: Mr. Gareth Price-Jones, Executive Secretary, Steering Committee for Humanitarian Response.

Opening remarks by Dr. Natalia Kanem, IASC PSEA Champion and UNFPA Executive Director

Dr. Kanem opened by describing her recent visit to the Democratic Republic of the Congo (DRC), where she witnessed the impact of the brutality and violence against women and girls and was able to hear about the difference that good medical attention and psychosocial support, in facilities supported by UNFPA, can make to lives of survivors. She met with women and girls who talked about the daily risks to their safety and well-being as they travel great distances to reach aid distribution points. These women and girls provided their own recommendations to limit risks of SEA. These recommendations include improving the efficacy of aid delivery, involving women in distribution committees, and consulting with women on the location and the security of the watcher points.

The Executive Director also met with officials at the UN Stabilization Mission in the Democratic Republic of the Congo (MONUSCO), who echoed the need for better dialogue and for more consultation with women and community members.

Dr. Kanem stressed the need to listen to the voices of women, girls, and other vulnerable community members. Trust in the UN is contingent upon the respect the UN demonstrates for those it serves. It is not just words, but it is our deeds that matter. Actions that show respect for human rights, for human dignity, and for the inherent worth of every person. This lies at the heart of ethical conduct.

UNFPA’s central message in its year of Championship was that we should all be champions of protection. That we must place the rights and dignity of victims and survivors at the centre of efforts. We must commit to a humanitarian environment where people in crisis can access protection and assistance without hesitation, without fear of exploitation or abuse by any aid worker.

Building on the work of previous PSEA Champions, UNFPA set a focus on strengthening the victim-centred approach while taking concrete actions to support field level implementation. These included:

1. Action to bolster in-country mechanisms and PSEA networks UNFPA oversaw the creation of a roster of PSEA coordinators for rapid deployment, and, together with IOM ensure the organization of a training of selected PSEA country coordinators. The first deployments of coordinators have already taken place.

2. Action to increase the quality of information and assistance to victims of SEA through the development of a training for GBV case workers. This work was undertaken in consultation with 200 experts in 26 countries and will be piloted in 2022.

3. Efforts to strengthen coordination and coherence at global, regional, and country level, including with civil society, affected communities and governments. This included the launch of an advocacy campaign on PSEA. This campaign reached 1.3 million people and shared information on communities’ and victims’ rights and upon the responsibility of the UN and partners to uphold these rights and deliver assistance to victims.

In addition, Dr. Kanem had commissioned the IASC External Review of PSEA progress. This independent review has pointed to positive developments, including a consistent commitment from
the IASC Principals on PSEA. It also touches on critical issues and on challenges, particularly the need to further operationalize the victim-centred approach, and the need for predictable resourcing and appropriate funding mechanisms. The Executive Director concluded with a call to governments, civil society, humanitarian actors, young people, victims’ rights groups, and the private sector to mobilize and act.

**UNFPA Championship video presentation**

In her video message to the roundtable Dr. Kanem said, “Throughout the year, I travelled to many countries with a focus on strengthening a victim- and survivor-centred approach. We need to listen to women and girls. They know what is going on in their communities, and they have solutions. Let us embrace their partnership and leadership. And most importantly, let’s act on their recommendations.”

What the full video at this link

**External Review - Presentation of key findings**

Ms. Moira Reddick, facilitator and author of the External Review on Protection from Sexual Exploitation and Abuse and Sexual Harassment.

Following the last IASC external Review in 2010 which considered the efforts of individual organisations and recommended that the IASC should adopt leadership for inter-agency PSEA efforts, IASC entities may have focused upon initially strengthening their individual efforts. Between 2012 and 2018 the IASC established essential interagency foundational work.

Significant progress has been achieved since 2010, including the establishment and reinforcement of roles and responsibilities at country level, the design of inter-agency Community-Based Complaints Mechanisms, the identification of good practices, the formalization of PSEA key concepts, and the dissemination of guidance and tools. The strategic outcomes set by the IASC were appropriate however there had not been clarity about targets or how success would be determined. Finalising the mechanics of a country level inter-agency structure had taken several years. Resourcing and provision of capacity has been ad-hoc. Consequently, implementation at country level has not been systematic, monitoring has been limited, and the evidence to assess if these mechanisms are appropriate is lacking. The reporting mechanisms now in place are not a substitute for monitoring of effectiveness.

The Review was organized around 4 key themes: the victim-centred approach; inter-agency CBCMs; leadership; and sexual harassment.

1. While there is a global consensus on the victim-centred approach, staff at country-level are not aware of commitments made by IASC Principals, or the consequent responsibilities and do not therefore have clarity on how to operationalise these responsibilities. There has not been discussion about the implications for both large and smaller IASC members and partners.
Adequate resourcing to fund GBV services has not been secured, this has implications for SEAH victims but there is not an apparent shared sense of responsibility with the burden for advocacy on this issue falling upon those agencies which are also GBV service providers. The IASC has not, yet, made notable progress in applying a victim-centred approach to investigation. Conversely there is evidence of progress on sharing of misconduct data.

2. The IASC has invested in one inter-agency tool for community-based complaint mechanisms (CBCMs), which has been collectively designed and piloted. While the inter-agency mechanism is comprehensive it is perceived as a complex and heavy mechanism. It requires support and collaboration across all sectors, monitoring capacity in the field, the ability and capacity to listen to and to feedback to communities, funding, all elements that have been lacking in most of the contexts considered. IASC members need more evidence that the CBCM guidance is being applied and is being effective at country level They must now consider the future of CBCM approach and also the implications of not re-committing to the model if this results in multiple models at field level.

3. On leadership, PSEAH is now firmly understood to be a leadership responsibility at HQ and country levels. Leaders generally broadly understand the commitments made by the IASC Principals, how to communicate on PSEAH, however, they feel that the system is over engineered and that they are not always being properly supported.

4. The IASC leadership has made commitments on sexual harassment since about 2018 but there is a lack of awareness of these commitments at country-level. Staff at field level explained that they are not confident in how to move ahead on this issue and are not clear of what is required from them. They need support in this regard.

Ms. Reddick concluded on the necessity to move from yearly planning to a 5-year planning; to establish targets; to secure predictable funding against targets; to conduct real-time monitoring in high-risk locations; and to produce evidence that the IASC models and approach lead to change and should be mandatory in every humanitarian context. Work on the underlying cultural issues and the power dynamics which enable both SEA and sexual harassment must continue to be a priority.

Interventions by Civil Society organizations representatives

Ms. Julienne Lusenge – Head of the Board of SOFEPADI (Solidarité féminine pour la paix et le Développement intégral) in DRC

Julienne Lusenge shared her experience as Head of the Board of SOFEPADI, a local organization in DRC supporting victims of GBV. She indicated that assistance to victims of GBV must be holistic and include medical assistance, psycho-social assistance, and legal assistance, and stressed that victims should receive assistance promptly. She added that medico-social assistance must be delivered to all victims and family members, particularly children born out of GBV, that justice must be served, and that the challenge of evidence preservation must be addressed to ensure victims can file a complaint and be heard. She also emphasized that justice must ensure the repression of perpetrators of sexual exploitation and abuse, which is an imprescriptible offense or crime in DRC. For that to happen, victims must have a chance to file a complaint.

Ms. Lusenge further explained that conducting awareness raising and community engagement activities and developing community-based complaints mechanisms and networks (CBCNs), were equally important. CBCNs have a critical role to play to report abuses, to popularize key PSEA messages within communities, and to process and share information received.
Ms. Lusenge presented the challenges facing CBCNs. These included the lack of responsiveness of responsible parties in providing feedback to communities and complainants on allegations reported and accountability processes enforced, and the need to train community organizations and leaders to preserve evidence and to consider the local culture in the design of complaint management mechanisms. The role of International Organizations in addressing these challenges, in support of local organizations, is essential and would contribute to break fear and silence surrounding sexual misconduct.

Ms. Ghida Anani – Coordinator of the PSEA network in Lebanon

Ms. Anani, Coordinator of the PSEA network in Lebanon, presented the pioneer partnership established between UNFPA Lebanon and ABAAD, the Resource Centre for Gender Equality in Lebanon, which serves the Middle East and Northern Africa region. UNFPA and ABAAD are co-chairs of the PSEA network, which comprises national and international organizations. This composition is innovative and adds value and relevance to the work of the Network. Most activities on PSEA in Lebanon are conducted in consultation with the Network and involve the right actors at community level.

Among key achievements of the network, Ms. Anani mentioned the production of materials and tools simplifying and popularizing communication on PSEA for communities, the public, and children. She specified that communications are available in French, English and Arabic, and in braille language, to address the lack of understanding of SEA and equip different sectors to sensitize the local population on the importance of PSEA. Ms. Anani indicated that a communication package was put at the disposal of front liners and decision makers and was produced in various formats (flyers, videos, training guides. She added that training was important to reinforce a culture of accountability in a country like Lebanon, where accountability and transparency and mechanisms and processes are lacking. The PSEA Network trainings have led to an increase in allegations reported to the network, which were substantiated and investigated.

Ms. Anani also discussed the challenges faced by the PSEA Network, including the need to further expand the membership and outreach of the Network beyond the humanitarian sector; to mainstream PSEA across all sectors, and to ensure a holistic inclusion of gender, PSEA and protection as one package in the Lebanon Crisis Response Plan. She also stressed the importance of widening the scope of sensitization beyond the humanitarian sector and reaching out to the private sector.

Interventions by Member States representatives

Ms. Leslie Norton, Ambassador & Permanent Representative of Canada to the United Nations and the Conference on Disarmament in Geneva

Ms. Leslie Norton thanked the IASC and UNFPA for including Member States in the round table discussions and welcomed the external Review as a timely exercise that will help plot collectively an informed way forward. First, she reaffirmed Canada’s support of the use of IASC minimum standards on PSEA and she commended the recently developed generic terms of reference for PSEA focal points, PSEA networks and PSEA coordinators, in order to support country level efforts. Secondly, she highlighted the need for Canada’s development and humanitarian partner organizations to have preventative measures in place and to investigate and report instances of SEA, while also considering the rights and needs of victims and survivors. Thirdly, she reminded the meeting that a continued concerted effort involving all stakeholders, including donors and partners, is needed to address deep
rooted power imbalances and gender inequality, and that organizational culture changes are necessary to make zero tolerance for SEA a reality in all international assistance efforts. Lastly, Ms. Norton called for remaining gaps to be closed to put an end to impunity of perpetrators and to increase accountability.

Canada’s Ambassador also presented several ways to tackle these challenges, including strengthening and diligently implementing safeguarding policies, by developing clear codes of conduct, raising awareness, improving hiring practices and putting in place whistleblowing avenues and protections. Canada also took note of the recommendation emerging from the Review to put in place a funding mechanism to help finance required efforts and asked that donors be included early in discussions related to the development of such a mechanism.

Ms. Norton concluded by reiterating that the government of Canada strongly condemns all forms of SEA in all international assistance operations and reaffirmed that addressing this issue is a priority for Canada.

Ms. Ann-Kathryne Lassegue, Mister-counsellor of the Permanent Mission of Haiti to the United Nations Office and other international organizations in Geneva

Ms. Ann-Kathryne Lassegue, on behalf of Haiti, thanked UNFPA and other IASC partners for their efforts on PSEA. She reaffirmed the constant commitment of the Haitian Government to the eradication of SEAH and the determination to implement public policies to reduce gender-based violence in Haiti.

Several initiatives have been taken at the initiative of the Haitian Ministry for the Status of Women and Women's Rights, in particular the development of a “2014-2034 Gender Equality Policy”, accompanied by a national action plan 2014-2020 which guides the actions, programmes and initiatives of the Government for 6 years; the adoption of the national plan to combat violence against women 2017-2027 which aims to allow women and girls to enjoy their right to be adequately supported and rebuild their lives; and the awareness campaign on the due respect for women's bodies “Respect my body, it is my dignity”.

Ms. Lassegue also presented the Haiti government’s efforts carried out at the judicial level and mentioned the reform of the Code of Criminal Procedure which penalises sexual assault and partially legalizes abortion. She also indicated that the Prosecution Service of Port-au-Prince has a structure and a designated focal point to collect complaints related to GBV and that each police station has an office to monitor violence against women and girls.

Ms. Lassegue reminded the meeting that women and girls are particularly impacted by natural disasters. Following the August 2021 earthquake, the precariousness of their living conditions was exacerbated. She concluded that Haiti, with the support of the international community, will adequately address sexual violence against its vulnerable populations.

Mr. Daniel McNicholas, Counsellor for Humanitarian Affairs at the Permanent Mission of the United States of America to the United Nations Office and other international organizations in Geneva

Mr. Daniel McNicholas reaffirmed the firm resolution of the United States to promote true system wide progress to advance effective PSEAH. He stressed that the risk and threat of SEA is amplified in crisis and conflict settings and among certain populations, with women, girls, and LGBTQ+ individuals facing the highest risks, and pointed to the fact that SEA is pervasive and chronically under-reported due to stigma, social norms, and fear of reprisal.
Mr. McNicholas urged the pursuit of collective action and indicated that protection measures against PSEAH must extend beyond the minimum actions of awareness raising, training and dissemination of codes of conduct, and must systematically embed risk analysis and mitigation activities across all sectors of an emergency response.

The United States welcomed the opportunity of the external Review to hasten progress, thanked UNFPA for facilitating a timely and important review of the past decade and the formulation of recommendations for the future, and urged forthcoming Champions to propel the momentum forward and increase PSEAH accountability and risk mitigation across all sectors.

Mr. McNicholas stressed that this issue must not be siloed into the protection cluster and that the entire aid community must vigilantly look for vulnerabilities and hold staff accountable.

He concluded by stating that the United States stand by and support the members of the IASC who have the power to make real change and to take concrete actions for the millions of vulnerable individuals in dire consequences.

Ms. Elizabeth Arthy, Deputy Permanent Representative for global health at the Permanent Mission of the United Kingdom of Great Britain and Northern Ireland to the United Nations Office and other international organizations in Geneva

Ms. Elizabeth Arthy welcomed the Review of PSEAH as a timely strategic opportunity to take stock at system-wide level and explained that a better system was needed to prevent PSEAH. This should be a system that listens better to those who are affected, a system that responds sensitively but robustly when harm or allegations of harm occur, and a system that learns from every case. She assured the meeting that the UK will continue to support system-wide efforts to make this happen.

Ms. Arthy noted that there have been improvements since the last IASC review 10 years ago, including strengthened leadership, the adoption of standards, more capacity and better planning. However, she also pointed out that much remains to be done and that the humanitarian sector had been recently reminded of this by the SEA allegations surfacing in DRC and implicating personnel from WHO and other organizations.

The UK government believes that leadership could be more coordinated and systematic, that agencies need to continue to work together to drive change, that safeguarding against SEA should be a priority in every humanitarian response, and that the survivor-centred approach must be implemented.

She added that the Review Report is an incredibly valuable input to the wider conversation on building a much more robust, responsive, better resourced, and more effective international system to prevent and better respond to SEAH in the aid sector.

Interventions by IASC Principals

Ms. Michelle Bachelet, United Nations High Commissioner for Human Rights

Ms. Bachelet thanked UNFPA and Dr. Kanem for her leadership as Champion. She reminded participants that SEA violates the human rights of victims, and that the zero-tolerance policy must delivered as a be victim-centred and human-rights centred approach. She further indicated that UN and humanitarian leaders need to show the way by endorsing common policies and operationalizing the victim-centred approach.
Ms Bachelet then reminded the meeting that much remains to be done, including strengthening accountability, which is key to gain and keep the trust of communities, and ensuring timely and effective internal investigations, preferably through joint investigative mechanisms as some entities have limited capacity or specialised capacity. She stressed that all credible allegations must be reported to state authorities, because ultimately only states can hold perpetrators criminally accountable for crimes involving SEA and urged national authorities to prioritize the investigation and prosecution of such crimes, including by asserting extra territorial jurisdiction over their nationals.

Ms. Bachelet advocated for victims to be empowered through legal aid programmes in addition to medico-social assistance, and for the provision of fast and non-bureaucratic economic support, without prejudice, to address victims’ dire economic needs, especially if they have children born out of SEA and have been excluded from their families.

She added that victims of SEA should be integrated into programmes for victims of GBV, noting that these programmes lack proper funding, which seriously undermines the commitment to ensure that victims have access to the support that they are entitled to across the board. Ms. Bachelet pointed out that the external Review highlights the lack of resources for PSEA, which impacts the ability to, for example, conduct proper screening of candidates or implement the protocol on Implementing Partners.

Ms. Bachelet concluded by urging Member States to provide the necessary political support and long-term resources to fully stamp out and effectively prevent sexual exploitation and abuse.

Ms. Kelly Clements, United Nations Deputy High Commissioner for Refugees

Ms. Kelly Clements expressed appreciation to Dr. Kanem for the opportunity to take a moment to take stock and reflect on progress achieved, both individually and collectively. She noted that the Review had positively reflected on the importance of the IASC Championship on PSEAH in ensuring that sexual misconduct remains at the top of the agenda and that IASC members continue to work jointly.

Ms. Kelly Clements expressed satisfaction on the Review recommendation to expand work on the victim- or survivor- centred approach and indicated that UNHCR adopted a policy on this approach last year. The CEB Task Force on addressing sexual harassment within the UN system has also developed a set of principles on the victim-centred approach. She added that as chair of the task force, she is committed to continue to find synergies in the IASC’s and CEB’s work on sexual harassment, as done in relation to investigations.

Ms. Clements also expressed satisfaction that the UNHCR and ICVA-led PSEA Community Outreach and Communications Fund had been launched, explained that this fund provides rapid targeted support to local NGOs to disseminate PSEA outreach and communication materials, and thanked Germany and the UK for supporting this effort.

She pointed out that implementing a victim-centred approach for victims of SEA requires quality and multi-sectoral programmes for protection from sexual and gender-based violence, and that the ability to deliver on these multiple fronts is challenged by operational realities: scarcity of services in certain locations, volatile security, restricted humanitarian access, as well as underfunding of operations.

Ms. Clements further explained that tackling sexual misconduct meant addressing the root of the issues, namely gender inequalities and power differentials through an emphasis on changing organizational cultures and setting a tone from the top.
She concluded by assuring the meeting that UNHCR remained committed to working collectively to tackle sexual misconduct until those who remain silent feel safe to speak out, until closure comes to each of those who need it, and finally until sexual misconduct no longer takes place in our organizations.

Ms. Tanya Wood, Executive Director of the CHS Alliance

Ms. Tanya Wood thanked Dr. Kanem for commissioning the Review and expressed her appreciation of the Report findings. On behalf of the CHF Alliance, she urged the IASC to look to the future for more coherence, coordination, and collaboration on PSEAH and to focus on the development of a common approach and frameworks.

She explained that the CHS Alliance comprises more than 160 organizations all of which have made commitments for which they can be held accountable. In total one third of the CHS indicators relate to PSEAH.

Ms. Wood indicated that more harmonization and coherence between NGOs and the UN was needed, and that sexual abuse, exploitation and harassment is an accountability failure requiring an even stronger focus on a more coherent approach to accountability. She expressed her agreement with the Report’s recommendation to scale up capacity for investigations, that trust in investigations must rely on transparent compliance with standards and reminded meeting participants that investigations also require resources and the ability to welcome complaints and provide feedback. She noted that data from organizations verifying against the CHS shows that organizations are failing in this regard.

She stressed that more needs to be done to build cultures of accountability that will respond to rumours of SEAH and that address the fact that women may be scared to speak up. She stressed that the tone must start from the top. In that light, she concluded by noting that the Review found that all the tools are there, she called for intensified political will to bring efforts together.

Closing remarks

Dr. Natalia Kanem, IASC PSEAH Champion and UNFPA Executive Director

Dr. Kanem thanked all participants in the high-level round table discussion for these exchanges that will be crucial in informing and advancing shared goals. She reminded all that putting an end to sexual misconduct requires all IASC members, and stakeholders in the humanitarian sector, to act in concert and to keep moving ahead in unity, shoulder to shoulder.

She reminded participants that the risk of abuse exists whenever we operate as humanitarian actors, that this is amplified because of the extreme power differentials. She called on her peers to exercise all their power to end these abuses once and for all in the sector, and define priorities for an innovative, bold, and urgent action plan. Mr. Kanem stressed that investing in effective PSEAH structures will encourage victims to come forward. She added that justice must be delivered when victims do step forward, by fostering a culture of integrity, accountability, and respect. That this should start in our own workplaces where zero must mean absolute zero tolerance.

As the UNFPA championship comes to an end, Dr. Kanem asserted that she endeavoured to build on the work of the previous Champions. She thanked IOM, UNICEF, UNHCR and committed to working with the incoming Champion.
She concluded by repeating how proud she is of the progress made but also expressed her sadness that there is so much still to be done and by reaffirming that she remains hopeful.

**Mr. Martin Griffiths, Under-Secretary General for Humanitarian Affairs and Emergency Relief Coordinator**

Mr. Martin Griffiths thanked Dr. Kanem and UNFPA for an extraordinary year as Champion. He indicated that Mr. Andrew Morley, President and CEO of World Vision, will take over the Championship in 2022. Mr. Griffiths then spoke of his recent visit to Tigray. There he visited a UNFPA project which provides safe housing to victims of GBV. Mr Griffiths explained that what was striking and painful is that he witnessed the difficulty survivors had in communicating on any issue of humanitarian need because of the stress and trauma they felt, and his observation that their experiences meant that they seemed to have no future in mind for them or their children.

He recognised that the Review, now endorsed by the IASC Principals, indicated that the Review shows a glass which is half full and half empty. Achievements have been noted however there is still an enormous amount of work ahead to deliver against the IASC PSEAH Strategy. There is a dire need to work with partners to sustainably fund effective PSEAH approaches, and to ensure that those we are holding responsible at country level receive the support to exercise their leadership.

Finally, Mr Griffiths reflected on the reality that PSEAH is an abuse of power, that opportunity for that abuse of power is a risk in all contexts, and that it is a central responsibility of leadership to use their power to change that reality.