



Protection from Sexual  
Exploitation and Abuse

Bangladesh - Cox's Bazar

# **Protection From Sexual Exploitation and Abuse (PSEA) Network Strategy and Action Plan**

**2021**

**Cox's Bazar, Bangladesh**



## Introduction

Sexual Exploitation and Abuse (SEA) by humanitarian aid workers can occur in any humanitarian or development context, and is a particular risk in emergency contexts characterized by violence, gross power imbalance, mass displacement, restricted access, and dismantled family and societal structures. Responding to the risks presented by the unprecedented volume of new arrivals added to the existing refugee population and the affected host population in Cox's Bazar, and the massive deployment of staff to respond to the Rohingya refugee crisis, the UN Resident Coordinator for Bangladesh called upon the humanitarian community in October 2017 to establish an in-country Network to prevent and respond to SEA. One of the primary activities of the Cox's Bazar ISCG PSEA Network (the "Network") is to maintain an up to date collective strategy to ensure that the humanitarian community enacts SEA prevention measures, provides timely assistance to survivors, and refers all allegations to the relevant investigation unit for follow up.

## Vision

Through the implementation of this strategy, Rohingya refugees and affected host communities in Cox's Bazar live in a trusted, respectful and inclusive environment free from SEA perpetrated by humanitarian aid workers. Refugees feel safe, understood and empowered to report SEA incidents and humanitarian actors, take robust and visible action. Senior management, in particular, ensure institutional prioritization and that the necessary systems are in place to effectively prevent and respond to SEA.

This strategy has been developed by the PSEA Network in Cox's Bazar to prevent, mitigate and respond to SEA. It includes identification of SEA risks, coordinated referrals, within Protection and Gender-Based Violence (GBV) referral systems, to survivor-centred care, assistance services. It also includes developing accessible systems that allow complaints to be reported in a safe, confidential and efficient manner. The strategy abides by the principles enshrined in the Secretary-General's Bulletin (SGB) on Special measures for protection from SEA (ST/SGB/2003/13) and reflects the numerous commitments made by agencies to actively engage on PSEA <sup>1</sup>.

The Strategy is steered by the Resident Coordinator and the Senior Coordinator for the Rohingya Refugee Response and has the buy-in and collaboration of all UN agencies engaged in the Cox's Bazar Response both at the Cox's Bazar and Dhaka level.

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<sup>1</sup> Among these commitments are: the *Statement of Commitment on Eliminating Sexual Exploitation and Abuse by UN and Non-UN Personnel* (2006), which expanded the PSEA framework outside the UN and to cover all personnel; the Uniform policy on balancing the disclosure of information to national authorities with principles of confidentiality when receiving and handling allegations of sexual exploitation and abuse by persons acting under a United Nations mandate; and the UN Protocol on Allegations of Sexual Exploitation and Abuse involving Implementing Partners.



## Strategic objectives

The PSEA Network members agreed and developed four strategic objectives, to reach this goal:

1. To build the capacities of humanitarian actors to prevent, mitigate and respond to SEA incidents;
2. To raise awareness on PSEA, and effectively communicate to refugees the zero tolerance Policy on SEA, and how to report incidents;
3. To provide a survivor-centred response to all SEA survivors, through coordination with GBV service providers, and commonly agreed principles embedded in reporting systems and community based complaint mechanisms;
4. To ensure leadership and coordination of PSEA interventions related to the Rohingya response.

### Objective 1: Capacity building

All UN Agencies and their partners and contractors are knowledgeable about the principles of the Secretary-General's Bulletin (SGB) on Special measures for protection from SEA (ST/SGB/2003/13), and relevant subsequent commitments on PSEA. They are able to recognise consequences of SEA for refugees and on affected communities, the seriousness of the problem, and understand what should be done to prevent and respond to SEA.

| Area     | Action                  | Responsible                                   | Target group  | When                                     |
|----------|-------------------------|---|---|--|
| Training | Conduct PSEA ToTs       | PSEA Network                                  | PSEA FPs, HR personnel <sup>2</sup> , training officers   | Every 3 months starting in June 2021     |
|          | Conduct PSEA Trainings  | PSEA FPs and trainers                         | All staff and affiliated workforce (including volunteers), partners and contractors from UN, INGOs, NNGOs and LNGOs | On a monthly basis starting in July 2021 |
|          | Conduct PSEA Inductions | Sector PSEA Reference Points (at field level) | Field Sector Staff  | As per sector needs                      |

<sup>2</sup> Include creation of HR best practices for reference check to HR officers.



## Objective 2: Awareness raising

Refugees are informed about their rights to humanitarian assistance and to report abuses against them through the use of SEA-sensitive reporting mechanisms. Refugees, host communities and humanitarian actors are aware of the impact of sexual exploitation and abuse on refugee's life and on the broader humanitarian response, and they understand the prohibition of exchanging money, employment, goods or services for sexual favours or other forms of humiliating, degrading or exploitative behaviour. Refugees, host communities, UN agencies, partners and contractors are oriented on community-based complaint mechanisms available to them, the process of reporting SEA to Focal Points or investigation units, and where to go to for assistance.

| Area              | Action  | Responsible  | Target group  | When                  |
|-------------------|---|--|---|-----------------------|
| Awareness Raising | Organize and engage in community consultations on PSEA  | PSEA Network   | Refugees and host community                                     | Starting in June 2021 |
|                   | Implement a communication plan that ensures affected communities are aware of the code of conduct of humanitarian workers and their right to file a complaint | PSEA Network with CWC WG, in coordination with the Protection Sector         | Refugees and affected host communities                          | Ongoing               |
|                   | Work with communities, develop, pilot-test, distribute Information, Education and Communication (IEC) material on PSEA.                                       | PSEA Network, PSEA FP with CwC WG  | Refugees and affected host communities                          | Starting in June 2021 |
|                   | Organize awareness raising sessions with community regarding multiple entry points for reporting SEA cases  | PSEA Network, PSEA FP and CWC WG, in coordination with the Protection Sector | Refugees and affected host communities                          | Starting in June      |
|                   | Reach out to, orient and train community volunteers and community leaders in all camps  | PSEA Network, PSEA FPs, PSEA trainers  | Volunteers, mahjis, imams and other community leaders as needed | Starting in July 2021 |
|                   | Ensure that translated information on available complaint mechanisms are displayed prominently in communities   | PSEA FP  | Refugees and host communities                                   | Monthly               |



### Objective 3: Response to SEA survivors and reporting systems

SEA survivors are provided with effective and timely support, as well as multi-sectoral service provision to address their needs. Refugees, host communities and all UN, their partners and contractors are able to report SEA incidents to available channels. Prompt action is taken to refer allegations to appropriate investigation units for follow-up, including possible disciplinary action.

Complaint mechanisms are accessible channels for women, girls, boys, and men to communicate with UN Agencies, INGOs, local NGOs, and all partners and contractors and to receive feedback in a timely manner. These mechanisms enable both personnel and refugees to make SEA complaints and to seek redress in a safe and confidential environment. A community-based approach adds efficiency to the reporting mechanism by incorporating local and bottom-up solutions into the overall system. The reporting mechanisms should be safe, easily accessible, and have multiple entry points, including embedded entry points within existing services, to ensure maximum coverage. Reporting mechanisms will be designed based on community consultations to ensure maximum accessibility, appropriateness and confidentiality when a report is made; mechanisms could take the form of a hotline, complaints or suggestion boxes, emails or face to face information points, or reception by trained and sensitized frontline workers.

Standard Operating Procedures (SOPs) are endorsed by all members of the PSEA Network and are followed for all allegations of SEA in Cox's Bazar. Upon endorsement, the SOPs apply to each member agency of the PSEA Network, including all UN personnel and affiliated workforce, implementing partners, contractors, and volunteers.

| Area                             | Action   | Responsible                                 | Target group                           | When        |
|----------------------------------|--|---|--|-------------|
| Response                         | Train GBV case managers on the SEA Case Management with a focus on the specific needs of the SEA survivors   | PSEA Network and GBV SS                     | Case Managers                          | August 2021 |
|                                  | Arrange psychosocial support to all staff involved in SEA Case Management  | PSEA Network in collaboration with MHPSS WG | PSEA FP, Case Managers and Caseworkers | August 2021 |
|                                  | Organize SEA investigation trainings for effective and efficient internal investigation.   | PSEA Network                                | Organization designated investigators  | June 2021   |
| Complaint Mechanisms & Reporting | Endorsement of SEA complaint referral SOP  | PSEA Network                                | PSEA Network Members                   | May 2021    |
|                                  | Creation of context specific "No Excuse Cards" to disseminate the information regarding mandatory reporting and to ensure contact details of the PSEA focal points are known by all. | PSEA Network                                | Humanitarian Workers                   | June 2021   |



|  |  |   |  |           |
|--|--|---|--|-----------|
|  | Train staff of complaint desks on complaint referral SOP   | PSEA FP                                 | Staff working on complaint desks       | June 2021 |
|  | Consult refugees and affected communities about the effectiveness of existing mechanisms and ways to improve them. | PSEA Network, Protection Sector, CwC WG | Refugees and affected host communities | June 2021 |
|  | Support a confidential and safe SEA reporting system, integrated into community-based complaint mechanisms         | PSEA Network, SMSD, PWG, CWC WG         | Refugees and affected host communities | July 2021 |

#### Objective 4: Leadership and coordination

The SG Bulletin states clearly that responsibility for its implementation lies primarily with senior management of each Organization, as well as with each humanitarian aid worker. The SEG members and co-chairs, the Senior Coordinator, Heads of Sub Offices and all senior managers create and maintain an environment which prevents, mitigate and responds to SEA. Full ownership of PSEA interventions is taken by leaders. They demonstrate an active commitment to use power responsibly by taking into account of, giving account to, and being held to account by the people they seek to assist.

As most agencies have their own processing and investigation mechanisms and must follow those mechanisms, the PSEA Network ensures that common standards are applied by all humanitarian actors to ensure zero tolerance to SEA, in the Rohingya refugee response.

Priorities, needs, capacities and views of refugees are prioritized, in all PSEA interventions, decisions and actions of humanitarian aid workers and senior management.

| Area       | Action   | Responsible   | Target group                             | When             |
|------------|--|---|--|------------------|
| Leadership | Demonstrate leadership through internal action on prevention and follow-up to complaints | INGO/NNGO/LNGO and UN Agencies and their partners and contractors | Representatives and Heads of Sub Offices | Upon appointment |
|            | Ensure PSEA is prioritized within their respective agencies                              | Country representative  | UN staff, partners, and contractors      | Immediately      |
|            | Ensure PSEA is regularly discussed at the SEG and within different <i>fora</i>           | SEG co-chairs   | Representatives and Heads of Sub Offices | Monthly          |
|            | Ensure swift action is taken to address SEA incidents                                    | Country representative  | Representatives and Heads of Sub Offices | Immediately      |



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|                     |  |  |  |                                |
|---------------------|--|--|--|--------------------------------|
|                     | Liaise with authorities to discuss PSEA, foster trust, and enhance cooperation                                       | Country representative, Senior Coordinator, PSEA Coordinator | Local law enforcement, RRRC, CiCs and army | Quarterly starting in May 2021 |
|                     | Nominate PSEA Focal Point  | Country Representative, Head of Sub-Offices                  | UN staff, partners, and contractors        | Immediately                    |
|                     | Ensure agencies actively participate in CXB PSEA Network   | Country Representative, Head of Sub-Offices                  | UN staff, partners, and contractors        | Immediately                    |
| <b>Coordination</b> | Advocate with all humanitarian actors to participate in the PSEA Network   | PSEA Network   | Humanitarian Actors                        | Immediately                    |
|                     | Organize joint planning and coordination meetings with Site Management, Protection, CwC and with ISCG                | PSEA Network   | Humanitarian Actors                        | Monthly starting in May 2021   |
|                     | Provision of technical support on PSEA to all stakeholders   | PSEA Network   | Humanitarian Actors                        | Immediately                    |
|                     | Reach out to LNGOs through the NGO Platform and different Forums for participation                                   | PSEA Network   | Humanitarian Actors                        | Immediately                    |
| <b>M&amp;E</b>      | Verify that all complaints received are handled according to each agency's established standard operating procedures | PSEA FP  | Refugees and host communities              | Immediately                    |
|                     | Maintain complaints data (number and nature) of complaints submitted   | PSEA FP  | Refugees and host communities              | Immediately                    |
|                     | Ensure data on SEA cases are received by the PSEA Network  | PSEA FP  | Refugees and host communities              | Immediately                    |
|                     | Analyse data trends  | PSEA Network   | Refugees and host communities              | Monthly starting in June 2021  |
|                     | Organize participatory assessments with refugees   | PSEA Network   | Refugees, and host communities             | As per need                    |



## Annex 1: Definitions<sup>3</sup>

Sexual Exploitation and Abuse: Particular forms of gender-based violence that have been reported in humanitarian contexts, specifically alleged against humanitarian workers.

- **Sexual Exploitation:** “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.”
- **Sexual Abuse:** “The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.”

### Additional definitions:

**Gender** refers to the social differences between men and women that are learned, and though deeply rooted in every culture, are changeable over time, and have wide variations both within and between cultures.

**Gender-based violence (GBV)** refers to any act perpetrated against a person's will based on gender norms and unequal power relationships. It encompasses threats of violence and coercion. It inflicts harm on women, girls, men and boys.

**Sexual Harassment versus SEA:** SEA occurs against a person of concern to the humanitarian community or member of the host community. Sexual harassment occurs between personnel/staff, and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature. Sexual harassment is not covered by this strategy.

**Gender-based Violence versus SEA:** Sexual Exploitation and Abuse (SEA) is a form of GBV that constitutes an abuse of power by aid workers against the affected population. SEA is based in gender inequality, power imbalance and disrespect of human rights. SEA can happen in any settings against anyone but the risks of SEA increase in emergencies settings. Anyone can commit SEA but those with more power are more likely to perpetrate while those with less power are vulnerable to becoming victims. Aid workers always have more power over those we are there to serve.

**Complainant:** A person who brings an allegation of SEA to the complaint mechanism in accordance with established procedures. This person may be an SEA survivor or another person who is aware of the wrongdoing. Both the survivor and the complainant, if different from the survivor, should be protected from retaliation for reporting SEA. Where there is any conflict of interest between the survivor and another interested party, the survivor's wishes must be the principal consideration in case handling, particularly when there is a risk of additional physical and/or emotional harm.

**Whistleblower:** A whistleblower is a type of complainant, not the survivor, who is a humanitarian aid worker making a report of SEA. Organizational whistleblowing policies encourage staff to report concerns or suspicions of misconduct by colleagues by offering protection from retaliation for reporting, and clarify the rules and procedures for reporting and addressing such cases. Internal agency policies shall protect whistleblowers on SEA from retaliation, so long as the report is made in good faith and in compliance with internal agency policies.

**Survivor/victim:** A person who has SEA perpetrated against him/her or an attempt to perpetrate SEA against him/her. The two terms might be used interchangeably, but this document use the term “survivor” for consistency. Persons who report SEA committed against themselves are treated as survivors for the purposes of security and needs assessments.

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<sup>3</sup> See IASC Global Standard Operating Procedures for Inter-agency cooperation in community-based complaint mechanisms, May 2016, available at <http://www.pseataaskforce.org/uploads/tools/1490892363.pdf> [accessed on 6th June 2018].





**Victim:** Also intended to reflect a person who has SEA perpetrated against him/her, used interchangeably with “survivor”. However, as much literature on assistance provision that was sourced for this document uses the “victim” terminology, the strategy will follow in kind when discussing victim assistance. Neither designation is in any way meant to imply a lack of strength, resilience, or capacity to survive.

**Humanitarian Aid Worker:** For the purposes of this strategy, this term encompasses all persons involved in providing protection and/or assistance to affected populations and who have a contractual relationship with the participating organization/partners, including incentive workers from target communities. It refers to all staff of humanitarian agencies and organizations, including UN agencies, IGOs, NGOs, implementing partners, and relevant CBOs including paid staff, volunteers, contractors, incentive workers, and anyone performing a task on behalf of any humanitarian agency or organization, regardless of the type or duration of their contract.

**Staff:** For the purposes of this strategy, “staff” of an organization is any person who works for or represents that organization, whether or not s/he is compensated monetarily and regardless of the type or duration of their contract.

## Annex 2: Six Core Principles Relating to SEA<sup>4</sup>

1. Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.
3. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of assistance that is due to beneficiaries.
4. Sexual relationships between humanitarian workers and beneficiaries are strongly discouraged since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of humanitarian aid work.<sup>5</sup>
5. Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.
6. Humanitarian workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct.

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<sup>4</sup> As stated in the Secretary-General’s Bulletin (SGB) on Special measures for protection from SEA (ST/SGB/2003/13).

<sup>5</sup> Inter-Agency Standing Committee (IASG) September 2019 revision: Any sexual relationship between those providing humanitarian assistance and protection and a person benefitting from such humanitarian assistance and protection that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work.



## Annex 3: Roles and responsibilities of Senior Managers, PSEA Focal Points, All Personnel

All humanitarian actors must abide by a code of conduct and have individual PSEA responsibilities to maintain an environment free of SEA, reduce SEA risk, and report known or suspected SEA incidents following their organization's internal complaint structure. Actors involved in complaint receipt, handling, referral and/or follow up, or in the oversight of the PSEA Network ("Stakeholders") hold particular responsibilities under global PSEA commitments.

### 1. The Strategic Executive Group (SEG):

Under the leadership of the Co-Chairs (Resident Coordinator, UNHCR Representative and IOM Representative) this body is comprised of the UN Representatives, INGO and NNGO Representatives, Donor Representatives at country level (Dhaka) and will support the implementation and monitoring of PSEA activities through oversight of the Cox's Bazar PSEA Action Plan. SEG members facilitate the identification or nomination of PSEA Focal Points from their respective agencies, actively participate in coordination meetings where PSEA will be raised, take PSEA-related decisions on behalf of their agencies, implement accountability and quality standards, and work collectively to develop prevention strategies and mobilize resources to support the Network activities.

A SEG member, as the head of his/her agency in Bangladesh, has the responsibility:

- a) To ensure that all staff within his/her agency read, understand, acknowledge, and adhere to his/her agency's internal SEA complaints handling procedures, including the institutional Code of Conduct, internal reporting mechanism, investigation policies, and other policies as relevant. Staff directly involved in prevention of and response to SEA should receive specialized training.
- b) To raise PSEA awareness among staff through induction training for new personnel and refresher trainings for current staff on PSEA, the Code of Conduct, the importance of complying with SEA policies, and procedures to report incidents.
- c) To support PSEA focal points and ensure they have direct access to the head of office, head of sub-office in Cox's Bazar, and to agency headquarters to execute their functions, including to ensure that:
  - i) Both human resources and programmatic sides of their operations have completed PSEA training and are aware of their obligations to report allegations and the procedures to do so;
  - ii) The designated focal points are actively engaged in inter-agency PSEA activities, and are allotted the time to regularly participate in PSEA meetings;
  - iii) PSEA responsibilities of focal points are incorporated into their performance evaluation reports.
- d) To promote his/her agency's adherence to SEA prevention procedures as outlined in the IASC Best Practices Guide, including but not limited to:
  - i) Due diligence to prevent re-recruitment of offenders;
  - ii) Ensuring that victim assistance services are provided;
  - iii) Compliance for whistleblowing protection on SEA allegations; and
  - iv) Enforcing PSEA clauses in cooperative agreements.
- e) To raise the PSEA awareness and capacity of partners from the moment they are selected, including but not limited to:



- i) Ensure that partners have a clear understanding of what SEA means and what their duties and responsibilities are in preventing and reporting cases;
- ii) Encourage partners to engage with the Network and create/strengthen their own PSEA policies;  
and
- iii) Include partners in PSEA trainings, as much as possible, to ensure adherence and commitment to PSEA.

Because the PSEA Network is seated in Cox's Bazar, Country Representatives may clearly and explicitly delegate PSEA oversight roles to Heads of sub-Office in Cox's Bazar, as appropriate. The Co-Chairs of SEG will nonetheless retain oversight seeking regular feedback from the Senior Coordinator Rohingya Refugee Response and Head of ISCG Inter-Sector Coordination group, who chairs the Heads of Offices Group.

## **2. The Resident Coordinator (RC):**

- Is responsible for leadership on PSEA in Bangladesh
- Ensures an inter-agency PSEA strategy and implementation plan is in place.
- Provides high-level support for the Network and helps to prioritize PSEA with senior management.
- Is kept aware of significant PSEA developments in CXB and receive biannual reports from the PSEA Coordinator and/or the Senior Coordinator, with further reports to be provided upon request from the Resident Coordinator. As part of the RCs role to co-Chair the SEG, the Co-Chairs will have oversight over the PSEA functions performed by the PSEA Coordinator, who will be directly supervised by the Senior Coordinator as well as activities undertaken on PSEA in Cox's Bazar.

## **3. PSEA Coordinator:**

- Is appointed to the ISCG in Cox's Bazar;
- Reports directly to the Senior Coordinator and will also have a dotted reporting line to the RC;
- Initiates, oversees, and coordinates PSEA activities in Cox's Bazar;
- Advocates for high-level commitment and reports on PSEA progress and challenges both in-country and global forums such as the IASC Task Team on AAP/PSEA, to ensure Cox's Bazar's country-based activities are understood and supported;
- Liaises between agencies and with external stakeholders, including government actors;
- Liaises with relevant service providers to ensure available and accessible assistance;
- Conducts regular Network meetings to facilitate information exchange, track collective progress, and identify common challenges and solutions;
- Coordinates and tracks implementation of the PSEA Network action plan;
- Builds capacities;
- Raises awareness on PSEA among humanitarian actors;
- Acts on behalf of the Network regardless of his/her employing agency, keeping a neutral role;
- When the complaints are received through the Network, s/he refers the complaint to the concerned agency's investigation unit for follow-up and the survivor to GBV service providers;
- Analyse PSEA-related data trends and inform strategy accordingly.



#### **4. All Senior Managers**

- Create and maintain an environment which prevents and responds to SEA;
- Nominate PSEA Focal Points and submit their names to the PSEA Network;
- Empower and support the PSEA Focal Points in order for them to carry out their responsibilities;
- Ensure that every member of staff and affiliate workforce is trained on PSEA;
- Plan, coordinate, and oversee PSEA activities with governmental officials, partners, and persons of concern.

#### **Checklist for Head of Office:**

- ✓ Familiarise with the responsibilities of senior managers, focal points and the in-country network. If possible, participate in a “learning event” for senior managers
- ✓ Appoint and provide regular supervision to a senior-level PSEA focal point and alternate for the office and include the focal point responsibilities in their ToRs
- ✓ Agree on an action plan with the focal point, including participation in a PSEA network, and monitor implementation
- ✓ Support the focal point’s efforts and promote action to protect from SEA in the agency, and the Strategic Executive Group (as appropriate)

#### **5. PSEA Focal Points:**

- Are nominated by the Country Representative of the Agency
- Support awareness raising activities on PSEA with Rohingya Refugees and the host communities;
- Support in the establishment of complaint mechanism, which includes SEA reports (in collaboration with other sectors);
- Ensure regular presence in the camps;
- Conduct regular meetings with refugees and host communities;
- Coordinate with GBV focal points, GBV actors and the GBV Sub-Sector as appropriate to ensure that SEA survivors have access to survivor-centred response services including, but not limited to case management, medical care, psychosocial support, legal assistance, safe shelter and physical safety;
- Identify a data management and security protocol, including data access safeguards, for all information related to SEA;
- Monitor numbers of incidents reported;
- Provide input to the internal planning, budgeting, implementation, and reporting of PSEA activities;
- Support Senior Managers to coordinate with partners in relation to PSEA activities;
- Conduct training sessions in their area of responsibility;
- Work with Sr. Management to establish and/or strengthen community-based complaint mechanisms for SEA and related SOPs jointly with partners;
- Brief refugees on their rights and obligations; ensuring a special point on SEA is made.



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### Checklist:

- ✓ Familiarize yourself with key documents and resources
- ✓ Speak with your head of office / country representative to ensure joint understanding of your focal point role and agree on an action plan
- ✓ Participate to the PSEA network meeting
- ✓ Identify yourself as a PSEA Focal Point throughout your office/organization
- ✓ Begin to implement the PSEA Focal Point ToR
- ✓ Provide awareness-raising sessions for personnel
- ✓ See to designation and training of field Focal Points in your organization
- ✓ Support development of internal procedures for staff to report incidents
- ✓ Strengthen, in coordination with the in-country network, community-based complaints mechanisms
- ✓ Facilitate, in coordination with the in-country network, awareness raising in local communities on SEA, their rights and how to report incidents

### 6. All staff and affiliate workforce:

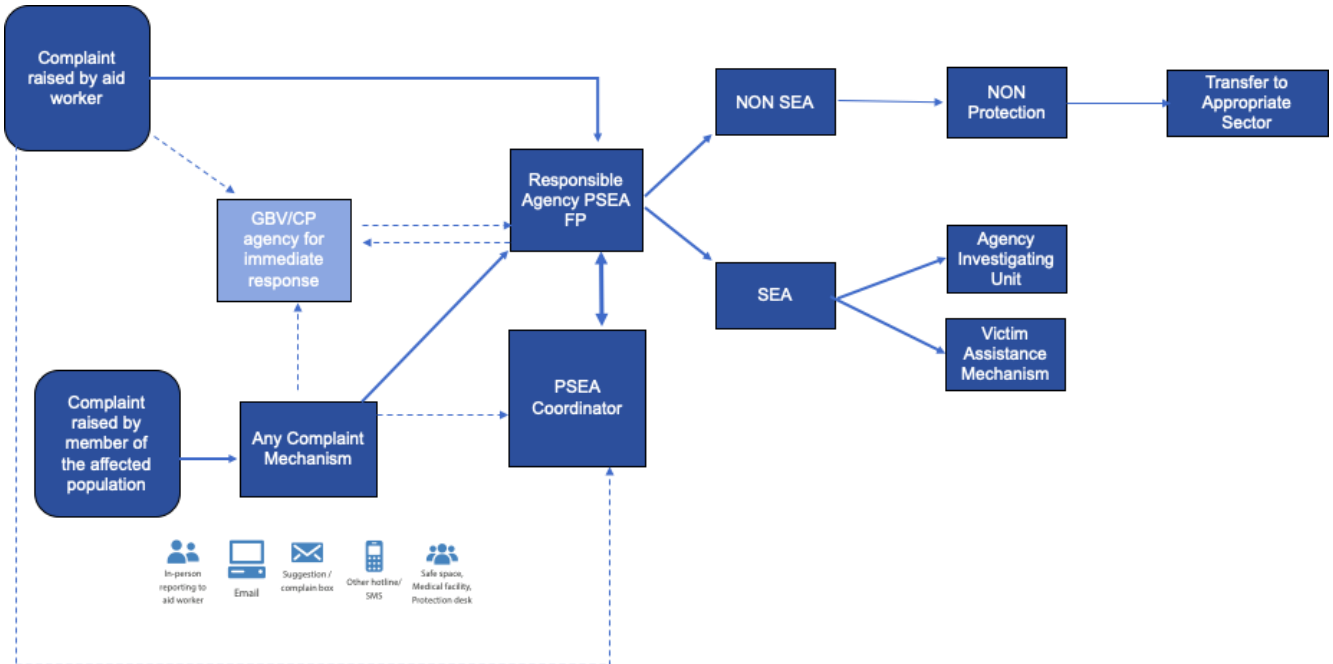
- Report concerns, suspicions, and complaints directly to their senior management, PSEA focal points or complaint mechanisms;
- Sign Code of Conduct;
- Completes the mandatory online course on PSEA.

### Checklist:

- ✓ Participate in an awareness raising session on PSEA
- ✓ Know the rules
- ✓ Know your PSEA Focal Point – if you don't, you can ask your human resources office



### Annex 4: SEA Field Referral Pathway





## Annex 5: Agency contact list for allegation reporting and investigation<sup>6</sup>

| ORGANIZATION              | NAME OF FOCAL POINT                     | CONTACT   |
|---------------------------|---|---|
| ACF                       | Md. Abu Zafar Hasnat<br>Anny Chowdhury  | arcsmgr-cox@bd-actionagainsthunger.org<br>cfsoff-cox@bd-actionagainsthunger.org |
| ACTED                     | Aisha Siddiqua                          | coxbazar.hradmin-officer@acted.org  |
| ACTION AID BANGLADESH     | Farhana Azizi<br>Aklima Akter           | Farhana.aziz@actionaid.org<br>aklima.akter@actionaid.org                        |
| BBC MEDIA ACTION          | Kate Gunn                               | kate.gunn@bd.bbcmediaaction.org   |
| BDRCS                     | Sanjida Rahman                          | sanjida.rahman@bdracs.org   |
| BLAST                     | Taposhi Rabaya<br>Mahbub Akter          | taposhi@blast.org.bd<br>mahbuba@blast.org.bd                                    |
| BRAC                      | Hasne Ara Begum<br>Hasina Akhter        | hasne.begum@brac.net<br>hasina.akhter@brac.net                                  |
| CDD                       | Ayesha Akter Monni                      | physio.ayesha@gmail.com   |
| CARITAS BANGLADESH        | Fouzia Rahman                           | fouzia1509@yahoo.com  |
| CHRISTIAN AID             | Manjima Madhuri                         | MMadhuri@christian-aid.org  |
| CODEC                     | Bilkis Banu                             | billkiss.banu@yahoo.com   |
| Concern Worldwide         | Shaikh Jannatul Moushumi                | jannatul.moushumi@concern.net   |
| DRC                       | Nicoletta Grita<br>Samiha Sahel         | nicoletta.grita@drc.ngo<br>samiha.sahel@drc.ngo                                 |
| FAO                       | Malika Budanaeva                        | malika.budanaeva@fao.org  |
| HI                        | Aleksandra Perczynska                   | ao.perczynska@hi.org  |
| ICRC                      | Sabrina Denuncq                         | sdenuncq@icrc.org   |
| IFRC                      | Saida Marzia                            | saida.marzia@ifrc.org   |
| IOM                       | Rawshan Zannat<br>Bernadett Fekete      | rzannat@iom.int<br>bfekete@iom.int  |
| IRC                       | Rozana Majumdar<br>Tahrima Akter        | rozana.majumdar@rescue.org<br>tahrima.akter@rescue.org                          |
| MSF                       | Elisabeth Bijtelaar                     | cxb-emco@oca.msf.org  |
| Mukti                     | Kishwar Tabassum                        | focaleducationmukti@gmail.com   |
| OXFAM                     | Monirul Islam                           | Molislam@oxfam.org.uk   |
| Plan International        | Sadikur Rahman                          | sadikur.rahman@plan-international.org   |
| Relief International      | Alejandro Cuyar                         | alejandro.cuyar@ri.org  |
| SARPV                     | Abdulla Al Farial<br>Md. Mohsin Hossain | farial.sarpv@gmail.com<br>mohsin.sarpv@gmail.com                                |
| Save the Children         | Maheen Chowdhury                        | maheen.chowdhury@savethechildren.org  |
| SKUS                      | Muhammad Saleh                          | msaleh@skus-bd.net  |
| Solidarites International | Samuel Komakech                         | cox.pro.adv@solidarites-bangladesh.org  |
| TDH                       | Elcin Cavlan                            | elcin.cavlan@tdh.ch   |
| Tearfund                  | Juyel Bairagee                          | juyel.bairagee@tearfund.org   |
| UNDP                      | Mahtabul Hakim                          | mahtabul.hakim@undp.org   |
| UNFPA                     | Subarna Dhar                            | dhar@unfpa.org  |

<sup>6</sup> Members of the PSEA Network are required to inform the PSEA Coordinator should there be a change of Focal Point as soon as possible.



## Protection from Sexual Exploitation and Abuse

Bangladesh - Cox's Bazar

|                                   |  |   |
|-----------------------------------|--|---|
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## Annex 6: PSEA Network Terms of Reference

### I. Network Description

The Cox's Bazar Protection from Sexual Exploitation and Abuse (PSEA) Network (hereinafter called CXB PSEA Network or the network) functions under the auspices of the Resident Coordinator (RC) to implement international commitments on PSEA including the Secretary-General's Bulletin (2003).<sup>7</sup> The CXB PSEA Network will give regular reports to Heads of Office in Dhaka and to the RC, who will have ultimate oversight of the network and may delegate regular oversight to the Inter-Sector Coordination Group (ISCG) Senior Coordinator and Heads of sub-Office in CXB.

### II. Principles

The humanitarian community in CXB affirms the Inter-Agency Standing Committee's (IASC)<sup>8</sup> commitment to promote and protect the rights enshrined in international humanitarian, human rights and refugee law, particularly the Convention on the Rights of the Child and the Convention on the Elimination of All Forms of Discrimination Against Women. The humanitarian community recognizes their responsibility, in fulfilling their mandates, to guard and protect vulnerable persons from sexual exploitation and abuse and to address such violations appropriately in their work. In particular, they must ensure their staff and partners do not abuse their power and influence to exploit and harm others.

### III. Membership

Network membership is open to all UN agencies, INGOs and NGOs operating in CXB that either 1) have an SEA complaint handling and response policy in place, or 2) commit to developing an internal complaint handling and response procedure. Each of these organizations will be represented in the network by one PSEA Focal Point, and preferably an alternate. Focal Points will coordinate the implementation of PSEA activities within their agency/organization and participate in network activities. These include, for example, PSEA trainings, site monitoring, and the establishment and ongoing maintenance of community-based complaint mechanisms for SEA. All PSEA Focal Points must be able to make decisions on behalf of their agencies in an inter-agency forum.

Participation as an observer in the CXB PSEA Network is open to all UN agencies, INGOs and NGOs operating in CXB regardless of their internal PSEA procedures, as well as Sector Coordinators who are encouraged to attend network meetings. Observer organizations may transition to full network membership, including voting privileges, by committing to develop complaint handling procedures for SEA. Sector Coordinators will provide two-way coordination between their sector and the network. Participation in the CXB PSEA Network will be reviewed to potentially include Government representation.

The Network will engage in outreach with non-member, non-observer organizations as part of ongoing activities. At a minimum, all organizations in CXB should be aware of the inter-agency PSEA complaint referral system and be able to receive complaints against their own staff, regardless of their relationship to the Network. The

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<sup>7</sup> *Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Sexual Abuse (ST/SGB/2003/13)*.

Available at <https://undocs.org/pdf?symbol=en/ST/SGB/2003/13>

<sup>8</sup> The IASC is the UNGA-mandated body to coordinate humanitarian response. It is comprised of both members (FAO, IOM, OCHA, UNDP, UNFPA, UNICEF, UNHCR, WFP, WHO) and standing invitees (ICRC, ICVA, IFRC, InterAction, SCHR, RSG/IDPs, UNHCHR, and the World Bank).



Network will advocate for the strengthening and/or establishment of internal complaint handling systems for all organizations operating in CXB and will offer support as needed where such systems are not in place.

#### IV. Responsibilities

Senior management within each organization are accountable for PSEA, and for ensuring that organizational processes and procedures supporting PSEA are in place, working effectively and are monitored and reviewed.<sup>9</sup> The CXB PSEA Network will serve as the primary body for coordination, support, and oversight of PSEA between its member organizations. Due to the fact that the risk of SEA, and responsibility for action, is shared across all sectors of the humanitarian response, the CXB PSEA Network will be established under the Inter Sector Coordination Group (ISCG), and will report on a regular basis to the ISCG coordinator and the UN Resident Coordinator for Bangladesh.

*The guiding Terms of Reference for the CXB PSEA Network are as follows:*

**1. Management and Coordination:** The network will be Co-Chaired by IOM and UNICEF. Responsibility for PSEA activities will be divided equally amongst network members, which the co-chairs will manage and coordinate by:

- Liaising with IASC Task Team on Accountability to Affected Populations and PSEA
- Establishing an effective PSEA action plan to be implemented by all actors engaged in the humanitarian response
- Ensuring a dedicated PSEA Focal Point is committed from each agency/organization
- Holding regular meetings of the CXB PSEA Network on the first Wednesday of every month, with ad hoc meetings as necessary and needs reviewed quarterly

**2. Engagement with Government, INGO and NNGO partners:** The network will engage with Government and NGO partners by:

- Advocating effective engagement and commitment from INGOs, NGOs and Government entities to implement PSEA principles and action plan in CXB
- Ensuring communication and awareness raising of beneficiaries' rights with UN and other humanitarian partners
- Increasing capacity of humanitarian actors, including UN Staff, INGOs, NGOs, and government counterparts on preventing, protecting from and reporting SEA

**3. Prevention and Protection:** The network will seek to prevent SEA and protect survivors of SEA by:

- Liaising with the Protection Sector to receive and refer victims of SEA for proper reporting and appropriate assistance services
- Working closely with assistance service providers in CXB to address the particular needs of victims of sexual exploitation and abuse and adopt appropriate procedures for providing redress. Network

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<sup>9</sup> Secretary-General's Bulletin, as above.



activities will follow a survivor-centered approach and respect the principles of informed consent and the best interests of the survivor.

- Advocating for and supporting mandatory regular training of all humanitarian workers in CXB on PSEA and complaint procedures
- Advocating with network members and partners to strengthen systems to prevent SEA, e.g. Human Resource practices, Codes of Conduct that include PSEA, and including PSEA in all field level agreements.

**4. Response:** The network will ensure appropriate response to SEA complaints in CXB by:

- Ensuring that agencies have effective internal complaints and investigation procedures in place which adhere to principles of confidentiality
- Establishing a complaint referral mechanism between UN agencies, NGOs, and other relevant entities
- *Note:* The CXB PSEA Network is not responsible for investigating complaints. This function rests solely with the entity that employs the individual against whom a complaint has been alleged, in line with internal policies.

**5. Commitment to Action:** The network commits itself to implementation of the PSEA Action Plan, including:

- Establishing Standard Operating Procedures for complaint referral in CXB, covering comprehensive monitoring and evaluation of complaints, referral pathways and reporting lines, and follow-up procedures.
- Advocating for the rights, protection and well-being of people, in particular women and children as well as needs of adolescents, for the prevention of and response to sexual exploitation and abuse, as a priority throughout humanitarian programming.
- Collaborating on awareness-raising for the community on their rights, how to report abuse, and appropriate behavior of all humanitarian staff.

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*Endorsed by the CXB Heads of sub-Office and the Senior Coordinator of the Rohingya Refugee Crisis and Head of the Inter Sector Coordination Group*

*Action Points for 2021 reviewed and endorsed by the PSEA Network Members*