

PROTECTION FROM SEXUAL EXPLOITATION AND ABUSE (PSEA) BY HUMANITARIAN PERSONNEL, NIGERIA

STANDARD OPERATING PROCEDURES (SOPS)



February 2020



Protection from Sexual Exploitation and Abuse Nigeria PSEA Network

The Nigeria inter agency PSEA SOPs draw from the Global PSEA Standard Operating Procedures and those on Inter-Agency Cooperation in Community-Based Complaint Mechanisms, endorsed by the IASC Principals in June 2016

DEVELOPED BY:

The Inter-Agency PSEA Standard Operating Procedures (SOPs) in Nigeria was developed under the umbrella of the Inter-Agency Network on Protection from Sexual Exploitation and Abuse by Humanitarian Personnel (PSEA Network) in Nigeria. This followed the training for PSEA Focal Persons on Inter Agency Coordination of Community Based Complaints Mechanisms supported by IOM. The PSEA Coordinator, Sylvia Opinia, supported by the PSEA Task Force members (UNFPA, IOM, UNICEF, UNHCR, WFP) led the development of the SOPs and participated in the initial drafting process, following extensive consultations within the PSEA Network members and agencies providing humanitarian services within Nigeria. It was also informed by findings from assessments conducted by different agencies focusing on protection and community preferences for reporting and complaints handling. The PSEA Network and its coordinator would like to thank all those who participated in the development of these SOPs and UNFPA Nigeria Management for providing guidance during the process.

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Contents

1. INTRODUCTION	4
Inter-Agency Cooperation on Protection from Sexual Exploitation and Abuse	4
Development of PSEA Initiatives by Humanitarian Personnel in Nigeria	4
Objectives & Scope.....	5
Definitions	6
2. ROLES AND RESPONSIBILITIES OF PSEA STAKEHOLDERS	8
3. THE INTER AGENCY SEA COMMUNITY BASED COMPLAINTS MECHANISM/SYSTEM (CBCM) .	10
Principles Guiding this Inter Agency Cooperation on SEA CBCM	10
Complaints Procedures.....	11
Receiving and assessing complaints.....	11
Complaint Intake Protocols.....	12
Assessing the complaint for referral.....	13
Inter-Agency Referral Pathways and Information Sharing Protocols for SEA.....	13
Investigations	14
Supporting the Needs of Survivors, Complainants, Whistle Blowers and Witnesses	15
Sharing SEA Complaints and Reports with the PSEA Network.....	16
4. ENGAGEMENT, IMPLEMENTATION AND ADDRESSING CHALLENGES	17
Inter-Agency Agreement.....	17
Challenges in the Implementation	17
Participation and Conflict Resolution	17
5. SIGNATORY PAGES FOR THE PARTICIPATING AGENCIES.....	18
6. ANNEXES	19
Annex I: PSEA Information Sharing and Reporting Protocol (ISP) in Nigeria: PSEA Network.....	20
Annex II: Nigeria: Inter-Agency Sexual Exploitation and Abuse (SEA) Complaints Referral System.....	24
Annex III: Inter-Agency SEA Complaint Intake and Referral Form	25
Annex IV: Nigeria PSEA Network: Case log Of Reported SEA Cases	27
Annex V: Template for Inter-Agency Quarterly PSEA Report.....	28
Annex VI: Nigeria Protection from Sexual Exploitation and Abuse (PSEA) Network Terms of Reference (ToR)	30
Annex VII: Terms of Reference for Focal Points on Protection from Sexual Exploitation and Abuse (PSEA)	34
Annex VIII: Template - Nigeria: PSEA Focal Points and Alternates List.....	36



1. INTRODUCTION

Inter-Agency Cooperation on Protection from Sexual Exploitation and Abuse

Sexual Exploitation and Abuse (SEA) inflicts incredible harm on the population that is meant to be served and protected by the very same persons exploiting them. It goes against all the principles of humanitarian action and its repercussions are disastrous for the persons who directly experience the exploitation and abuse, but also for the community in need of emergency assistance, as well as humanitarian actors in general, as confidence and trust is greatly impacted by such actions.

In 2002, there was a realization that SEA needed to be addressed through systematic change at various levels - from global through to local levels. Since then, several commitments at global and inter agency levels have been made. These Standard Operating Procedures (SOPs) were developed considering this context. In 2003, the UN Secretary-General's Bulletin on SEA integrated the Inter Agency Standing Committee's (IASC's) six principles on PSEA. The bulletin outlines a zero-tolerance policy toward SEA, obligates humanitarian personnel to report incidents of abuse, and is binding on all UN, IGO and NGO staff, including all agencies and individuals who have cooperative agreements with the UN, IGO & INGO.

Mechanisms were established to foster inter-agency cooperation on ensuring protection from SEA. PSEA is closely linked with Accountability to Affected Populations (AAP). In late 2015, the Principals of the IASC reinforced PSEA leadership responsibilities within the Humanitarian Coordinator position: inter-agency PSEA initiatives now have leadership and a reporting structure. The Under-Secretary General/Emergency Relief Coordinator now receives reports on the progress of PSEA initiatives in-country in order to ensure accountability and to continue to raise the profile of this critical issue. Similarly, the Secretary-General has prioritized PSEA from the beginning of his tenure, creating the Office of the Special Coordinator on SEA and the UN Working Group on SEA, which is introducing UN-wide protocols that will bind UN agencies and implementing partners on areas such as SEA victim assistance and referral of cases to national authorities.

In December 2013, the IASC Principals endorsed the AAP-PSEA Task Team's Priority Paper, to support a 2-year project piloting the establishment of Inter-Agency CBCMs on PSEA. It has become apparent that coordination between agencies is necessary to effectively prevent SEA and respond to the incidents that do occur. Even one incident of sexual exploitation or abuse can undermine the humanitarian aid work in an entire response, because it breaks the beneficiary trust needed to fulfil our mandate. For this reason, agencies have been working collectively to take action to coordinate Protection from Sexual Exploitation and Abuse (PSEA) activities.

Development of PSEA Initiatives by Humanitarian Personnel in Nigeria

Given that ensuring a systematic and cohesive response to SEA requires strong coordination between humanitarian actors; the leadership of the humanitarian response in Nigeria, has elevated Protection from

Six Core Principles Relating to Sexual Exploitation and Abuse

- 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. 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.*
- 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. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.*



Sexual Exploitation and Abuse (PSEA) onto the humanitarian agenda and it is discussed regularly. A PSEA Network was created along with operationalized Terms of References (ToRs) in March 2017 by the Deputy Humanitarian Coordinator (DHC) on behalf of the Humanitarian Coordinator. The PSEA Network comprises of agency/organisation Focal Persons (FPs) from UN, IGO and NGO, and through the PSEA Coordinator, reports directly to the Humanitarian Coordinator (HC).

The inter-agency coordination on PSEA in Nigeria involves collaboration in activities to raise awareness of the community on PSEA and their right to assistance without exploitation or abuse, nominated Focal Points who meet regularly and share PSEA lessons learned and good practices; as well as coordinating referrals to victim assistance providers, so that SEA survivors have access to appropriate assistance. One prominent joint action, which is a priority of the PSEA Action plan, is to establish and participate in an inter-agency complaint mechanism.

It is the responsibility of all UN agencies, IGOs and NGOs in Nigeria to ensure that a safe, confidential, transparent, and accessible complaints system is established so that all potential complainants know where and how to submit a complaint. Beneficiaries must understand their right to free humanitarian aid, their right to complain and to receive assistance, and how they can access help in the manner most comfortable to them. Humanitarian workers, in turn, must understand what SEA is, and the SEA reporting procedures of their own agency.

Objectives & Scope

The SOPs aim to prevent and respond to SEA committed by UN, NGO and IGO personnel by establishing a common response system to ensure coordinated and effective responses to potential SEA cases in Nigeria. More specifically, it aims at facilitating joint efforts in protecting beneficiaries of Aid and staff delivering Aid by enhancing collective capacity of agencies and affected population to prevent and respond to SEA.

It is important to note that the SOP is in no way intended to change or override the existing organizational specific internal policies on PSEA. Rather, they are procedures to supplement internal policies and reinforce system wide, common action to prevent and respond to SEA.

Scope: This SOP covers and provides clarity on the following areas in the context of Nigeria:

- Roles and responsibilities of PSEA stakeholders;
- Key principles in preventing and responding to SEA;
- Inter-Agency SEA Community Based Complaints Mechanism/system - A common procedure for responding to SEA complaints;
 - i. Receiving and assessing SEA complaints;
 - ii. Victim/Survivor assistance provision
 - iii. Referrals and investigation

The SOP covers all UN, IGO and NGO entities in Nigeria's humanitarian response, and their personnel. While the geographical scope will primarily focus on the most conflict affected states in the North-East, it will also apply to other states where the leadership - HCT/UNCT - has activated the humanitarian response architecture.

The PSEA Network will ensure strong linkages, engagement and involvement of other relevant stakeholders such as the Government Agencies and security actors. The inter agency SEA reporting and referral mechanism will ensure linkages with other accountability mechanisms for appropriate referrals to be guaranteed. Through the office of the Resident Coordinator/Deputy Humanitarian Coordinator, the PSEA Network will develop



formal cooperation and information sharing agreements with relevant institutions, to facilitate reporting and referral of SEA allegations guided by the principles in these SOPs.

Definitions

Sexual Exploitation and Abuse (SEA): 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”.

Sexual Harassment versus SEA: SEA occurs against a beneficiary or member of the 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 these SOPs although agencies’ internal procedures for reporting sexual harassment allegations may be the same as for reporting SEA complaints. The distinction between the two is important so that agency policies and staff trainings can include specific instruction on the procedures to report each.

Gender-Based Violence versus SEA: GBV is an umbrella term for any harmful act that is perpetrated against a person’s will and that is based on socially-ascribed differences between males and females (i.e. gender). It includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. SEA can be seen as a form of GBV, as victims of SEA are often abused because of their vulnerable status as women, girls, boys, or even men (in some circumstances). The procedures in this document only cover SEA complaints.

Community-Based Complaints Mechanism (CBCM): A CBCM is a system blending both formal and informal community structures, where individuals are able and encouraged to safely report incidents of SEA. Local communities are involved in developing and approving the CBCM so that the structure is both culturally and gender-sensitive. The mechanism should have multiple entry points, allowing both beneficiaries and staff the opportunity to report at the organizational level – internally through the network’s or field agency focal points – or at the community level. The primary concern of the mechanism is to aid known and potential SEA survivors, and fulfil a prevention function through awareness-raising efforts. A PSEA CBCM should not be a separate, parallel system to other complaints and feedback structures in a given area, but rather link to and build on existing structures to create one system for handling feedback and complaints.

Beneficiaries of Humanitarian Assistance: A person who receives assistance as part of either emergency relief or development aid through assistance programmes. Persons under this title include members of affected populations including refugees, internally displaced persons and other vulnerable individuals, as well as host community members. Sexual exploitation or abuse of a beneficiary is SEA; however, the individual need not be in a vulnerable position; a differential power or trust relationship is sufficient to establish SEA.

Complainant: A person who brings an allegation of SEA to the CBCM 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 principle consideration in case handling, particularly when there is a risk of additional physical and/or emotional harm.

Whistle-blower: For the purposes of these SOPs a whistle-blower 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. Therefore, the definition, scope, and protection measures may differ between organizations. CBCM principles (e.g. confidentiality) apply to whistle-blowers as they would to any complainant, and internal agency policies shall protect whistle-blowers on SEA from retaliation, so long as the report is made in good faith and in compliance with internal agency policies.

Survivor: A person who has SEA perpetrated against him/her or an attempt to perpetrate SEA against him/her. For the purposes of these SOPs, persons who report SEA committed against themselves are treated as survivors for the purposes of security and needs assessments.

Victim: Also intended to reflect a person who has SEA perpetrated against him/her, used interchangeably with “survivor”. These SOPs use the term “survivor” for consistency. However, as much literature on assistance provision that was sourced for these SOPs uses the “victim” terminology, the SOPs 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.

Subject of the Complaint (SOC): Once a complaint has been filed, the alleged perpetrator of SEA is referred to under these terms.

Humanitarian Aid Worker: For the purposes of these SOPs, 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 these SOPs, “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. (see also “Implementing Partners”)

Implementing Partners: Entities or organizations that operate at country level, in accordance with established UN, IO or NGO procedures, to provide services and deliver humanitarian assistance. Staff of, and all those employed by, an implementing partner are “humanitarian aid workers” for the purposes of these SOPs.

Code of Conduct: A set of standards of behaviour that staff of an organization are obliged to adhere to.

Entity of concern or agency of concern: This term is used to define the entity or agency where the alleged perpetrator works



2. ROLES AND RESPONSIBILITIES OF PSEA STAKEHOLDERS

The Resident Coordinator (RC): Overall leadership responsibility for the PSEA framework in Nigeria humanitarian response lies with the RC/HC. Leads the HCT work on PSEA and ensures that there is an in country network and country level action plan to address SEA. The HC/RC's Office supports the system wide coordination of the PSEA Network and ensures adequate resources. He/she receives regular updates, reports from the PSEA coordinator on the situation, trends of SEA and the operation of the inter agency SEA CBCM as well as notifications on complaints/allegations reported. He/she acts as the global advocate for the in country PSEA programme and regularly reports to the Emergency Relief Coordinator (ERC) on actions taken to prevent and respond to SEA.

The Humanitarian Country Team (HCT): The senior level body, comprising of Heads of Agencies, holding the primary accountability, decision making and oversight authority for PSEA activities at country level. The HCT members nominates PSEA Focal Points from their respective agencies, that actively participate in coordination meetings, implements accountability and quality standards and work collectively to develop prevention strategies and mobilize resources to implement the CBCM. The HCT endorses the country level PSEA work plan and SOPs and assists the RC/HC in discharging his/her responsibility. Provides the PSEA programme with direction, reviews progress, addresses obstacles and engages high-level stakeholders. The HCT/OHCT meets regularly (at least once a quarter) to update on PSEA progress, identify gaps in PSEA programming and find solutions including mobilisation of agency resources. They ensure that internal PSEA systems are in place within each member organisation.

The Co-chairs: Nominated by the HCT, comprising of 2 agencies (UN and INGO) representing the high-level management (i.e. heads of offices). On behalf of the HCT and with guidance of the RC/HC, are responsible for ensuring that the PSEA network works according to their TOR. Ensure the RC/HC has resources available for PSEA system wide coordination and in the absence of a PSEA coordinator, report on PSEA activities to the HCT/or UNCT and any other appropriate structures on a regular basis, advice and assist members as required. The Co-chairs provide technical guidance for the smooth running of the inter-agency PSEA Network.

The UN, IGO and NGO Individual Agencies: Individual heads of agencies/organisations are responsible for addressing SEA in their agency and for ensuring that mechanisms are in place to prevent and respond to SEA committed by their personnel. The heads of agencies designate PSEA Focal Points that assist him/her in implementing organisation wide PSEA actions and participate in establishing/strengthening system wide coordination for effective responses to potential SEA cases and actions.

PSEA Focal Points (FPs): Nominated agency staff, they support agency wide PSEA activities. The PSEA Focal Points form the PSEA Network. The Focal points lead common PSEA activities in all locations and report on progress and on specific cases to the PSEA Coordinator as required. Agencies are encouraged to nominate their own PSEA Focal points in every field office location. The PSEA Co-chairs in consultation with HoAs may designate common PSEA Focal Points in locations with elevated risks. (*See Annex for detailed PSEA FP's ToRs*)

PSEA Coordinator: The PSEA Coordinator is fully dedicated to initiating, overseeing, and coordinating the inter-agency PSEA activities in the Nigeria response and reports to the RC. He/she is responsible for engagement with the DHC and the Humanitarian Country Team, in order to advocate for high-level commitment and broad engagement at the country level. The Coordinator will also notify the IASC results group responsible for AAP/PSEA to ensure that global level forums maintain a current understanding of country-based activities and that operational agencies' headquarters are informed and can make sure that their Heads of Office at country level understand the need to actively participate. The Coordinator reviews the complaints received through the PSEA CBCM, makes referrals to the concerned agency and for victim/survivor assistance. (*See generic PSEA Coordinator's TOR as agreed by the IASC Results Group on PSEA and ERC's office*)



Protection from Sexual Exploitation and Abuse Nigeria PSEA Network

PSEA Network: The inter agency technical body implementing the PSEA programme, serves as the primary body for PSEA coordination between organisations. The PSEA Network comprises of PSEA focal points from HCT members/UN, IGOs, NGOs. They are guided by a work plan. Some of the responsibilities of the PSEA Network include:

- Support PSEA work internally in their organisations and the PSEA programme as part of collective commitments
- Keep track of PSEA related activities to identify gaps and avoid duplication. Harmonise PSEA work between agencies for consistent messaging and save resources.
- Conduct SEA assessments in high-risk areas
- Conduct community awareness events, community consultations and otherwise act as the face of PSEA to staff and the affected population
- Develop and update inter-agency standard operating procedures and referral pathways to ensure timely and consistent survivor support
- Hold agencies accountable to one another in developing a PSEA action plan and implementing that plan against strategic performance indicators
- Ensure PSEA is integrated across key interagency planning processes for Nigeria humanitarian community

(See annex for detailed TOR for the PSEA Network).

The affected Community: Integral partners to the PSEA programme. They should input to the PSEA programme so it is culturally relevant and needs based, decide appropriate complaint and feedback channels and inform prioritisation of work plan activities.



3. THE INTER AGENCY SEA COMMUNITY BASED COMPLAINTS MECHANISM/SYSTEM (CBCM)

The Community Based Complaints Mechanism (CBCM) is a system by which anyone (community member or staff) can bring an SEA allegation to any complaint and feedback mechanism and the complaint will reach the concerned agency while the complainant receives services that they need.

The inter-agency PSEA Network in Nigeria¹ initiated a process of establishing an Inter-Agency SEA Community-Based Complaint Mechanism (hereinafter the Mechanism), a system to enable the reception of allegations of SEA through an integrated complaints system and the provision of referrals between agencies in an effective, safe, confidential, transparent and accessible manner, with the aim of reducing impunity and ensuring protection of survivors and witnesses. This Mechanism is intended to enhance the implementation of each agency's existing Code of Conduct, PSEA and/or complaint handling policy, standards and regulations that guide the behaviour of personnel. It links to the internal complaint channels for all agencies, so that SEA complaints get referred to the right unit for action.

The Mechanism is informed by findings from community consultations carried out by the Accountability to Affected Persons (AAP) working group that focused on understanding existing community-based complaints and feedback mechanisms. It is also enhanced by various reports from safety assessments conducted in selected IDP Camps by GBV Sub Sector partners that outline some preferred channels for reporting GBV related concerns especially by women and girls. The Mechanism has been developed through discussions and consultations amongst the PSEA Network Focal Points and contextualized to the circumstances of conflict affected persons in Nigeria.

Principles Guiding this Inter Agency Cooperation on SEA CBCM

Survivor-Centred Approach: Actively prevent and respond to SEA and to ensure that all responses are developed in a manner that balances respect for due process with a survivor-centred approach in which the survivor's wishes, safety, and well-being remain a priority in all matters and procedures. All actions taken within the operations of this Mechanism will be guided by respect for choices, wishes, rights and dignity of the survivor.

Informed Consent of the Survivor Vs Mandatory Reporting: In all cases, it's important to facilitate informed consent of the survivor, without comprising the mandatory requirement for reporting. The IASC core principles make it mandatory for all humanitarian workers who become aware of SEA to report immediately through the established reporting mechanisms. The survivor has the right to or not to be involved in the reporting and investigation process of the case. In the event the survivor wishes not to be involved, the survivors' access to services should still be prioritised and facilitated while the incident should be referred without his/her names and identification.

All entities should ensure that all its personnel are fully informed: about their duty to report any concerns, suspicions they have or allegations or complaints they become aware of; of the agency's complaint and response policy and procedures; and of the role and how to contact its PSEA Focal Point or manager; and the established SEA reporting and investigative body, as applicable.

Confidentiality: Actors will respect the confidentiality of complainants, survivors, and other relevant parties at all times. All SEA-related information will be kept confidential, identities will be protected, and the personal information on survivors shall be collected and shared only with the informed consent of the person concerned. Disclosure of information will be on a strict need-to-know basis. Where physical records are kept, documents will be stored safely to prevent accidental disclosures. Every participating agency shall adhere to the data Protection Principles in the event that it collects, receives, uses, transfers, or stores any personal data of a complaint guided by the principles in this SOP.

¹ See ToR for PSEA Network in Nigeria



Safety & Well-Being: The safety of all parties (the survivor, the complainant if different, the subject of the complaint, and the organizations involved) shall be ensured at all times including during reporting, investigation by the concerned agency, and victim assistance provision. This includes coordinating physical protection when necessary with the informed consent of the survivor, and pre-emptively addressing potential retaliation against all complainants. A security/protection plan shall be drawn up as needed based on the risk assessment for each survivor and the protection concerns for both the alleged survivor and witnesses should continue to be considered throughout and after an investigation.

Transparency and Feedback: The functioning of the inter agency SEA CBCM shall remain transparent to the community. All potential and actual survivors of SEA must be fully informed about how the complaint system works, including the reporting process and throughout the duration of the case handling. Complainants and survivors have the right to receive feedback on the development and outcome of their case, and the CBCM will make every effort to maintain lines of communication. In order to protect the integrity of the investigation process, feedback on individual cases will be given only to the complainant. In situations where the complainant is a minor, the legal custodian or representative will be informed.

PSEA policies and reporting channels within agencies also need to be transparent. Mandatory policies and guidance need to be communicated to those in the field who have the obligation to implement, and from there need to be communicated to every employee and contract worker.

Partnership: The best interests of an SEA survivor are served when protection agencies and service providers work together to provide holistic care. Humanitarian crises exacerbate the risk of affected populations being subjected to SEA², which underscores the need for a coordinated plan of action between humanitarian response agencies. The participation of the survivor³ in determining assistance/recovery interventions is essential to maintain his/her best interests and responsible case management.

Special Considerations regarding Children: All the principles listed in this section apply to children, including the right to participate in decisions that will affect them. If a decision is taken on behalf of a child, the best interests of the child shall be the overriding principle/guide. The complaint and survivor/ victim assistance referral pathways shall be designed and implemented in consultation with actors who are trained to handle the special needs of child survivors of sexual abuse, and who are familiar with local procedures relating to the protection of children.

Standards of Conduct: All entities will institutionalise and promote within their organisation the **6 Core Standards** adopted by the IASC and outlined in the **SGB Special measures** for the protection from sexual exploitation and abuse (ST/SGB/2003/13) and **UN Statement of Commitment for UN and Non-UN Personnel** (2006). All humanitarian workers commit to a **Zero-Tolerance** approach to any form of sexually exploitive and abusive behaviour of humanitarian personnel and to understand their obligations to report any concerns or suspicions they have to their agency's PSEA Focal Point.

Where applicable, all personnel shall understand and sign the entity's Code of Conduct, or similar document, setting out the standards of acceptable and unacceptable behaviour. This document should incorporate the abovementioned specific standards. All entities are obliged to undertake necessary disciplinary action to prevent and respond to misconduct by their personnel.

Complaints Procedures

Receiving and assessing complaints

Complaints regarding allegations of sexual exploitation and abuse by a humanitarian worker may be brought to the attention of humanitarian leadership directly by the survivor or by anyone who has a suspicion or a

²67 See IASC Report of the Task Force on Protection from Sexual Exploitation and Abuse in Humanitarian Crises, 2002

³ Inter-Agency Standing Committee Gender-Based Violence Guidelines (2015), Part 2 Background, Key Elements of the Survivor-Centred Approach for Promoting Ethical and Safety Standards, p. 47.



concern e.g humanitarian personnel, Internally Displaced Persons, refugees and host community members, among others.

Each entity should facilitate individuals to submit a complaint or make a report in whichever manner individuals feel most comfortable and safe to do so. Concerns or complaints can be raised and will be accepted by each agency through multiple entry points, at any level and through any method, such as: directly in person from a complainant, via an existing community complaint mechanism. These include: Women and Girls Friendly Spaces (WGFS), Child Friendly Spaces (CFS), adolescent/youth friendly spaces, school and learning centres, established hot-lines, Health centres/facilities within camps and host communities, community mobilizers, Protection Action Groups (PAGs) or health workers; through complaint boxes; protection monitoring, Protection complaint desks or help desks; Camp management and community leaders, and through an agency's management structure or directly to its designated investigative body where established. Inter-agency confidential reporting email is nga.psea@humanitarianresponse.info

Where there is a genuine belief that the primary reporting route is compromised for any reason, then the SEA report should be lodged through the PSEA Coordinator through the confidential email nga.psea@humanitarianresponse.info.

Entities agree that personnel who are most likely to receive a complaint or become aware of sexual exploitation and abuse are trained on how to receive complaints or allegations of sexual exploitation and abuse, how to report concerns or complaints to their PSEA Focal Point or investigative body where established.

Complaint Intake Protocols

When in direct receipt of a complaint, issues of confidentiality and informed consent of the survivor should be addressed with the individual explaining that all humanitarian workers are obliged to report to their agency or investigative body when they become aware of any concern or complaint of sexual exploitation and abuse by a fellow worker. While reassuring the complainant that all information will be kept private and shared strictly on a need to know basis in consideration of the wishes and best interest of the survivor. The following standard protocols for interaction with complainants during in-person complaints will be followed;

- Treat the complainant with respect and make him/her as comfortable as possible. Use a separate room whenever possible for purposes of privacy.
- An immediate assessment of the survivor/victim's health, security, and psychosocial needs should be conducted and based on identified needs and the survivor's consent, a referral for appropriate services should be made using the existing GBV referral pathway. – if there is no capacity to conduct a safety assessment, refer to the nearest GBV case worker.
- Avoid asking too many questions. Ask only the relevant number of questions⁴ required to gain a clear understanding of the complaint so that it can be referred to the appropriate agency's investigation unit. Reporting should not be rushed, and complainants should be allowed to fully articulate the situation in their own words before clarifications are sought.
- Ensure that all information is well-documented during the in-person interview using the standard Complaint Intake & Referral Form, so that the allegation can be immediately referred to the investigating agency. A Focal Point or agency should not conduct multiple interviews, as this can contribute to further traumatization and can jeopardize the investigation by potentially tainting evidence.
- Ask the complainant how s/he would prefer to receive further communications from the CBCM.

⁴ For example, the status of the virginity of the survivor is not relevant and should not be discussed.



- For female survivors, always try to conduct interviews with female staff, including translators. For male survivors able to indicate preferences, it is best to ask if he prefers a man or a woman to conduct the interview.
- **Handling Child Cases (18 years and younger):** In the event that an SEA allegation or complaint is reported concerning a child, ensure that protection principles and child safeguarding measures are in place to avoid the chance of children being put at risk for taking part in the CBCM. Ensure the child is referred to a professional with the required skills in dealing with child survivors of sexual violence e.g GBV case worker. Some key considerations include the following: - talk with the child in the company of a trusted adult; be nurturing, comforting and supportive; reassure the child that it is not their fault, do no harm: be careful not to traumatize the child further and help them feel safe; information must be presented to them in ways and language that they understand and respect children's opinions, beliefs and thoughts. During the intake process, choose a safe location for interviews with children, explain who you are and depending on the age of the child, obtain permission from the child and care giver to speak, maintain equality with the child (e.g sit at the same height with the child), explain to the child what will happen and the process, do not make promises you cannot keep and don't force or pressure the child to talk.
- After explaining the next steps to the complainant, and referred the survivor for immediate services, ensure that the complaint is sent to agency PSEA Focal Person and/or to the PSEA coordinator at nga.psea@humanitarianresponse.info using the standard SEA intake and referral form paying attention to the following information for further assessment; What happened & when: describe what is being reported in the words of the complainant(s), taking note of names of survivors, perpetrators and perpetrators' organisation, dates or locations of the incident(s) where possible; How and if the complainant or survivor can or prefers to be contacted; Date of when the statement was taken; What services have been provided to the survivor and what additional resources are desired.

The agency PSEA FP and/or PSEA coordinator will assess the complaints for further action, including referrals for assistance, protection/safety, investigation, among others.:

Assessing the complaint for referral

Once the PSEA FP and/or Coordinator has received the complaint, he/she conducts an assessment for further action: - to determine the immediate protection and assistance needs of the victim/ complainant, establish the nature of the complaint, and identify which agency to refer the allegation. The PSEA FP and/or Coordinator ensures the survivor is referred to access appropriate victim assistance and protection services when required. He/she refers the allegation immediately using the standard SEA intake and referral form, within 24hours and notifies the complainant that his/her complaint was received.

Note that the PSEA FP and/or Coordinator's assessment is not a fact-finding procedure and does not substantiate a claim or determine whether there is sufficient basis for investigation.

Inter-Agency Referral Pathways and Information Sharing Protocols for SEA

Entities agree to receive complaints referred from another entity in good faith and in the spirit of cooperation, in line with this Mechanism and the SEA Complaint Referral Pathway. In referring complaints entities must maintain confidentiality and respect the reputation of the agency and of the individuals involved in an allegation or complaint.

All information contained in a complaint or report, including the identity of the survivor and alleged perpetrator, the incident, the location etc. must remain private and information is shared with the minimum number of people necessary strictly on a need-to-know basis for the purpose of investigation and service provision. The necessity to share information to third parties i.e. protection services or national authorities, will be decided on a case-by case basis in consideration of best interests of the survivor, and other safety and protection considerations of all those involved.



To support safe, confidential and efficient inter-agency referrals, entities agree to the following procedures to receive and address complaints about another entity or from another entity:

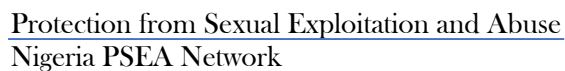
- The entity receiving the complaint is not responsible for investigating the complaint but must prioritise the safety of the survivor, witnesses, alleged perpetrator and other individuals who could potentially be affected and should follow the procedures set out in this Mechanism. In this process, and in consultation with the relevant investigative services of individual responsible organisations, attention will be paid to the preservation of evidence in respect of confidentiality, the consent and wishes of the alleged survivors who should receive timely and accurate counselling.
- The entity receiving the complaint shall seek the consent of the complainant in relation to referral of the complaint to the PSEA Focal Point of the agency of concern or that agency's investigative body. The mandatory reporting of sexual exploitation and abuse in accordance with the SGB needs to be explained to the complainant and seek to comply with this requirement considering safety and protection of all individuals and entities involved. Areas of consent to discuss with the complainant include consent to participate in the investigation process, among others. If the complainant does not agree to any form of involvement, this means careful considerations on how and when to report and which mitigation/protection measures should be put in place in parallel.
- Complaints will be referred between the PSEA Focal Points of the entities involved – receiving the complaint and where the alleged perpetrator works - in person and in writing (email or hand-posted letter) providing the necessary information available about the complaint or allegation using the standardised Complaint Intake and Referral Form. Further or prior communication can be conducted by phone, particularly in cases where the emergency protection risks warrant immediate action.
- Where in direct receipt of a complaint, the agency of concern shall ensure that the complaint is safely and appropriately investigated. In parallel to this, referrals to protection services will be provided when required through conducting a risk/safety assessment as per the established procedures in the Interagency GBV SOPs.
- The PSEA Focal Point of the agency of concern should acknowledge receipt of a complaint and report to the referring agency and confirm that the matter was addressed, in full consideration of confidentiality principles and the best interest of the survivor.
- Agencies referring and/or receiving internal SEA complaints should notify the PSEA Coordinator. The PSEA Coordinator will send confidential notification to the HC as "Complaint under investigation" and an update report after administrative process have been finalised.

Investigations

Entities agree to always prioritise the protection of the survivor, his/her family members, witnesses and any other individuals who might be affected by an allegation or complaint and all entities will endeavour to cooperate to mitigate any potential risks during and following an investigation. They should also seek to protect the alleged perpetrator, as he/she would also be affected by an allegation. (E.g. Respect confidentiality regarding the alleged perpetrator, facilitate the alleged perpetrator's access to information, and the possibility to be heard/present a defence).

Investigations of complaints or allegations of sexual exploitation and abuse should be undertaken exclusively by dedicated personnel of the entity of concern or by the established Investigative body affiliated with that entity, that are charged with this responsibility and who have the necessary skills and competence to undertake such investigations appropriately.

Each entity is responsible for ensuring adherence to its own internal investigation policies and procedures, in order to coordinate, manage, assess, investigate and respond to complaints or allegations of sexual exploitation and abuse.



In the event an agency may lack the capacity to investigate internally the PSEA Network, upon request from the concerned agency, can support the agency to identify PSEA-trained investigators from global investigation rosters where possible – at the cost of the requesting agency.

Supporting the Needs of Survivors, Complainants, Whistle Blowers and Witnesses

Entities will make every effort to put in place prevention measures and support mechanisms to protect anyone who raises a complaint of sexual exploitation and abuse to their agency. All entities must respect the privacy, confidentiality and rights of all those involved in a complaint or allegation of sexual exploitation and abuse, including the complainant, the survivor, a whistle-blower, a witness and the subject of a complaint or alleged perpetrator.

Anyone making a complaint should be made aware that all humanitarian workers are obliged and mandated to report to their agency when they become aware of any concern or complaint of sexual exploitation and abuse by a fellow worker. Complainants should be reassured that information will be shared strictly on a need to know basis, through established reporting mechanisms, and with full consideration of the wishes and best interest of the survivor, while ensuring safe access to applicable criminal procedures.

Entities must consider the immediate or on-going protection, safety or assistance needs of anyone involved in a complaint or allegation of sexual exploitation and abuse this includes the survivor, complainant, whistle blower⁵, witness and subject of the complaint. Entities will follow the **Inter-Agency Emergency Standard Operating Procedures for Prevention of and Response to Gender-Based Violence and Violence, for Case Management and Referrals** to protection services.

To avoid malicious accusations: entities must reassure their personnel that no action will be taken against those who report in good faith information indicating a violation of the entity's staff codes of conduct, rules and regulations regarding sexual exploitation and abuse, even if following an investigation, it proves unfounded. And if personnel knowingly and wilfully report false or malicious information regarding another member of staff, such false reports lead to disciplinary action. Entities must establish the appropriate environment within their entity to ensure that there is no retaliation by fellow humanitarian workers from within their agency and the PSEA Network will support each other to ensure that retaliation between entities is prevented and managed.

Entities are aware that allegations of SEA can sometimes be made maliciously and without foundation. The need to pay attention to the confidentiality of information, especially of any identifying-data, and of the needs of the individual subjects of such allegations (i.e. the alleged perpetrator or survivor) is fully recognised and support (i.e. counselling) should be facilitated where possible for any psychological strain or physical harm that may be caused by such.

15 | Inter Agency PSEA SOPs- Nigeria



Sharing SEA Complaints and Reports with the PSEA Network

Entities must follow its Data Protection Protocols and implement appropriate procedures to maintain confidentiality of all data gathered in relation to a complaint of sexual exploitation and abuse. Entities should keep all information safe and secure. Some measures to ensure data protection can include:

Paper file security (for investigative bodies) - paper documentation should be stored in an individual file, clearly labelled with a complaint/incident number. Names of the complainants or any subjects of a complaint are NOT on the outside of the paper file. Paper files should be kept in a locked cabinet / drawer, accessible only to responsible individuals specified by the entity. No one else should be given independent access to the paper files without permission. Rooms containing paper and electronic information should be locked securely when personnel leave the room. All personnel are aware of the importance of being vigilant as to who is entering the room where they work and for what purpose.

Electronic data security - all computers being used for data storage are password protected. All applicable personnel are aware that information should be transferred using encrypted and password-protected files whether this is by the Internet, online or memory stick. A back-up system i.e. external hard drive on and off site, of said data should be established in order that the main database can be restored in case of technical problems, or destroyed in an emergency evacuation without this meaning the loss of all electronic data.

Entities should appropriately document the management process of a complaint received, the outcomes of any investigation and the actions taken in line with the entity's internal policy and procedures.

Entities agree to share the following information on SEA complaints within the PSEA Network:

- Confidential notifications to the RC through the PSEA Coordinator when an allegation has been received. After the investigation has been completed, the agencies' PSEA Focal Persons shall inform the PSEA Coordinator – who has an obligation to inform the RC - on the status of the investigation and action taken in a timely fashion, which shall be done in accordance with the protocol of each organization for sharing such information.
- Using the reporting template (See Annex) entities will on a quarterly basis, share the necessary information with the PSEA Coordinator, who will compile said information into an anonymous quarterly and annual PSEA report, which is shared with the PSEA Network – Heads of Agencies. At a minimum each entity agrees to submit the following information related to their agency:
 - Total number of SEA complaints received
 - Total number of SEA complaints referred
 - Total number of SEA complaints investigated
 - Type of allegations received
 - Overview of any prevention or risk mitigation measures undertaken to improve service provision and the future protection of affected communities and other individuals.



4. ENGAGEMENT, IMPLEMENTATION AND ADDRESSING CHALLENGES

Inter-Agency Agreement

These SOPs are signed for and on behalf of the parties by their Heads of Agencies appearing below. By so signing this agreement, the signatories undertake:

- That they have read, understood and are in full agreement with the content of the SOPs.
- To make every effort to work together in collaboration and create an environment whereby the spirit of the SOP is fully enforced.
- To designate a PSEA Focal Point and Alternate for the organisation and equip said persons with the skills and resources to undertake their responsibilities as defined in the PSEA Focal Point Roles and Responsibilities and to engage in the PSEA Network as per the Terms of Reference.
- To disseminate the contents of the SOPs comprehensively within their respective entities and take all necessary steps to ensure their implementation and adherence by all their respective personnel.
- To disseminate the SOP publicly and to personnel and beneficiaries, in the local language and appropriateness so as to be understood by those target audiences.
- To ensure that any and all violations of the PSEA Principles and standards contained within these SOPs, especially related to the behaviour of personnel, and of individual organisational Codes of Conduct are dealt with in accordance with the SOP and as provided for in the respective entity's investigative, administrative and disciplinary procedures, decisively and without delay.

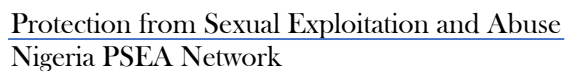
Challenges in the Implementation

In cases where challenges in implementing the SOPs are raised – either by any of the signatory participants or by the PSEA Focal Point network - a process will be followed to discuss the matter and determine appropriate action to be taken and address the issue within one month in order to facilitate on-going information sharing and referrals. A meeting will be convened including the PSEA Focal Points of the relevant entities and the PSEA coordinator/Co-chairs to discuss the matter and to determine appropriate actions to be taken within two (2) weeks from the identified challenges in the implementation. If unresolved, the matter should be referred to the Senior Management within the two (2) following weeks, including the D/HC. The HCT commits to attend ad hoc meetings as necessary to address these unresolved PSEA issues with the inputs of the PSEA Coordinator/Co-Chairs.

Pending the resolution of the matter, referrals among PSEA Network members and information sharing should continue, noting that interruptions in the implementation of this mechanism may be considered misconduct within the regulations of individual entities. During this process, regular updates will be provided to the PSEA Network members signatories of this protocol. In the event that the resolution cannot be agreed upon, signatories have the option to terminate, in writing, their inclusion in the SOPs and these SOPs will be revised accordingly.

Participation and Conflict Resolution

This SOP is considered as a living document, which shall continue to be developed for greater effectiveness. It shall be open for signature by humanitarian agencies not signing them on the date below and which may subsequently wish to do so on an on-going basis. Such organisations will signify their interest to the PSEA Network Coordinator, within the office of the RC who will take the necessary steps to formally include the agency in the SOPs and the PSEA Network. Regular (preferably once a year) revisions will be undertaken as appropriate.



All signatories to these PSEA Standard Operating Procedures are committed to preventing and protecting individuals from sexual exploitation and abuse by any of its personnel, and in doing so agree to extend the fullest cooperation and assistance to each other in adherence with the following:

- Apply ‘Best Practices’ Standards;
- Adhere to or demonstrate a commitment to achieving the appropriate compliance with the relevant data protection law.

[illegible]



6. ANNEXES



Annex I: PSEA Information Sharing and Reporting Protocol (ISP) in Nigeria: PSEA Network

1. PURPOSE⁶

This Information Sharing Protocol (ISP) sets out the guiding principles and describes procedures for referring incidents, as well as sharing anonymous, statistical data on reported cases of Sexual Exploitation and Abuse (SEA) between the PSEA Network members and the Resident Coordinator's Office (RCO), as the coordinating lead (this includes the duly appointed agency to lead PSEA inter agency coordination on behalf of the RCO) with overall leadership responsibility for the PSEA framework in Nigeria. The protocol is meant to facilitate good practices in information sharing between participating actors on how to share essential information throughout the reporting, referral and response process. The aim is to improve collaboration and to ensure the responsible collection, handling, referral and investigation of SEA allegations, as well as feedback and timely reporting.

PSEA Network members/participating organisations recognize that sharing and receiving SEA information/data will contribute towards improved inter-agency coordination, identifying and targeting gaps, prioritization of actions, and thus improved programming of prevention and response efforts. This Information Sharing Protocol is designed to increase confidence among all participating organizations in ensuring that information will not be misused or shared beyond the boundaries specified in this document, keeping the best interest of victims/survivors.

2. GROUND RULES

- An effective response to allegations of SEA involving aid personnel in Nigeria, requires the engagement and collaboration by all UN, INGO, IGO and National actors. Entities agree to receive complaints referred from another entity in good faith and in the spirit of cooperation, in line with this protocol, the PSEA SOPs and the SEA Complaint Referral Pathway.
- In referring complaints, entities must maintain confidentiality in order to respect the reputation of the agency and the privacy and reputation of the individuals involved in an allegation or complaint.
- The right to confidentiality is equally applicable to the survivor, his/her family and community; and to the alleged perpetrator, his/her family, his/her work environment, and witnesses.
- An electronic system for tracking and following of SEA allegation should setup at Maiduguri Operational level and the National level. All participating organisations should adhere to the agreed inter-agency PSEA Network protocol and standard templates for reporting SEA allegations.

3. RECEIVING, RECORDING AND REFERRING SEA ALLEGATIONS

All participating organisations (members of PSEA Network) should set-up mechanisms for receiving and handling SEA complaints against their personnel from another organisation. When in direct receipt of a complaint, the recipient should explain the mandatory reporting obligation for UN and aid workers, while reassuring the complainant that all information will be kept private and shared strictly on a need to know basis in consideration of the wishes and best interest of the survivor. (Refer to the SOPs for explanation on Mandatory Reporting Vs Survivor's Consent; and Guidance provided in the Inter Agency SEA Complaint Intake and Referral Form for Guidance on Steps).

⁶ This protocol is based on the standard gender-based violence (GBV) information-sharing protocol for the GBV Information Management System, as SEA is a form of GBV and thus SEA data carries with it the same sensitivities.



Using the standard inter agency SEA intake and referral form (See Annex III), the recipient of the complaint/allegation should record only the necessary information (as required in the Complaint Intake Form) and refer the survivor for immediate services (when required) and explain the next steps.

The recipient must PROTECT the form, keeping it in a locked place or in a pass-word protected database. The recipient of the complaint should NOT try to ascertain whether or not the allegation is true or to make any investigation into the allegation.

The recipient will send the SEA allegation to the PSEA Focal Person of the recipient's organisation and/or to the PSEA coordinator at nga.psea@humanitarianresponse.info using the Inter Agency SEA Complaint Intake and Referral Form as soon as safely possible for further assessment or call the toll free number for inter-agency reporting of SEA allegations.

The PSEA Focal Point and/or PSEA Coordinator will refer the allegation within 24 hours upon receipt of an allegation (using the Inter Agency SEA Complaints Intake and Referral form) to the Agency of Concern, and inform the complainant that his/her complaint was received. Where the agency reporting channel is compromised, or not known, refer the complaint to PSEA Coordinator nga.psea@humanitarianresponse.info or call the inter agency toll free number for reporting allegations as soon as safely possible. Note this is the only time where information is shared with identifiable details between organisations, therefore adherence to data security and confidentiality is a requirement.

Agencies referring and/or receiving SEA complaints – whether internally or from another agency- should notify the PSEA Coordinator confidentially and anonymously (do not provide the name of the victim and the name of the perpetrator, but provide the name of the agency of concern) on all allegations received. The PSEA Coordinator will send confidential notification to the Resident Coordinator (RC) as “Complaint under investigation”. This notification report does not include identifiable details.

Responsibilities

Upon receipt of allegations by one of the PSEA Network members, each entity will deal with alleged cases against its own personnel according to its internal SEA allegations reporting and investigation procedures. The PSEA Network members need to be informed promptly of EVERY allegation of SEA against a member of their personnel.

The following processes apply for all SEA allegations:

- If the complaint implicates a personnel of the same organization; receiving the allegations, the recipient should refer complaint internally in conformity with the organization's internal reporting procedure (usually internal reporting procedures require to inform head of the organisation or investigative body).
- If the complaint implicates a personnel of a different organization; refer the complaint to the PSEA Focal Point / head of organisation of the accused person's organisation (Agency of Concern)
- If the complaint is a rumour or the alleged perpetrator(s) affiliation is unknown; the recipient of the complaint should refer internally to their organisation's PSEA Focal Point, who will alert the PSEA Coordinator to ensure the PSEA Network takes necessary actions, such as training and community sensitization in the risky area.
- If the complaint implicates a member of the local community, the recipient should inform the complainant of relevant options including reporting to the police, if appropriate and if the survivor consents to informing police/ national authorities.
- If the complaint implicates a member of the Nigeria security forces, use the exiting information sharing protocols agreed between the humanitarian/aid community and the respective actors. In the absence of such existing protocols, refer confidentially to the nga.psea@humanitarianresponse.info or activate the GBV referral pathway.



- A report of SEA allegation may relate to one or more alleged perpetrators and may involve one or more victims/survivors. When a report is received, a process of ensuring accountability starts. If a report received refers to alleged perpetrators of more than one category of personnel (for example, civilian and military), or personnel from more than one security actor (in case of CJTF or Nigeria Police), the report would be counted individually for each separate track of accountability: one for civilian personnel, and one for each security agency whose personnel may be involved.

4. INVESTIGATING SEA ALLEGATIONS

The entity receiving the complaint is not responsible for investigating the complaint. When in direct receipt of a complaint, the Agency of Concern shall ensure that the complaint is safely and appropriately investigated. Each entity is responsible for ensuring adherence to its own internal investigation policies and procedures, in order to coordinate, manage, assess, investigate and respond to complaints or allegations of sexual exploitation and abuse.

All information contained in a complaint, including the identity of the survivor and alleged perpetrator, the incident, the location etc, must remain private during investigations and information shared with the minimum number of people, strictly on a need-to-know basis. The necessity to share information to third parties i.e. protection services or national authorities, should be decided on a case-by case basis in consideration of victims'/ survivor's consent, the best interests of the survivor, and other safety and protection considerations of all those involved.

Providing Feedback on SEA Investigations

Agencies agree, as a practical accountability tool, to share statistics on SEA cases involving their own personnel that have been reported and/or investigated, and the disciplinary measures taken if any, with the Resident Coordinator through the inter agency PSEA Coordinator whether or not the complaint was initially received by the same entity. They should provide regular/quarterly updates about the status of any investigation with the PSEA Coordinator. To the extent possible and in coordination with internal investigative policies and procedures, agencies are encouraged to provide to the PSEA Coordinator the following information;

- The number of reports in a given period;
- The confirmation that these reports have been referred to the competent investigative body that has acknowledged receipt;
- That the concerned agency has activated its internal mechanism for the provision of protection and assistance to the victim/survivor.

5. DATA SECURITY

Entities must follow their Data Protection Protocols and implement appropriate procedures to maintain confidentiality of all data gathered in relation to a complaint of sexual exploitation and abuse. Entities should keep all information safe and secure. (Refer to this PSEA SOPs for details on Data Protection)

The Resident Coordinator's Office (RCO) will ensure that all data received is safe and secure and will implement appropriate procedures to maintain confidentiality of the data. The following agreements have been reached on how the data received by RCO from the participating organisations will be handled:

- Reporting: Email to the PSEA Coordinator using standard reporting templates outlined in this SOP;
- Storage/deletion: Storage in the PSEA Coordinator's or RCO's computer in non-shared drive; to be deleted annually;
- Protection in the computer: Password protected.



- Utilisation of data by who (who has access to the data and to the computer): PSEA Coordinator or the RC.
- SEA data should never be used or stored in non-production systems, and access passwords should be stored in a password manager rather than entrusted to individuals

In case the security situation further deteriorates in Nigeria, hampering PSEA Network members' abilities to protect and assist survivors or their information, the Information Sharing Protocol will be reviewed and consequently adapted to respond to the changing environment.

6. REPORTING AND INFORMATION SHARING

There are several ways of looking at the SEA reports/data but five are most important: by allegations received, by alleged perpetrators, by victims, by investigations, and by action taken. Database should have filters to be applied to view the data for a specific period, Agency of Concern, category of personnel, or nationality of personnel.

- **Notification on allegation received:** PSEA Network members will notify the RC when an allegation has been received concerning personnel from their own organization. This report is anonymous (no personal identifiable information is included in the report) and confidential. The framework for this is SGB/2003/13 of which all UN and non UN entities follow. This is not a bureaucratic exercise, this is so, the RC as the Secretary General (SG's) highest representative in a country is not caught unaware of allegations within his/her area of responsibility.
- **Quarterly and Annual reports.** PSEA Network members share a compilation of statistical information on SEA cases received during the quarter and year and a narrative on key actions undertaken by the organisation in implementing their PSEA action plan. The template for this periodic report is available (See Annex V). The individual agency reports are kept confidential, information is used to compile the inter agency quarterly and annual reports for the Humanitarian Country team (HCT). This report will also be shared back to the PSEA Network members who have submitted individual reports.
- **Annual certification:** All UN agencies submit an annual certification to the RCO stating that all allegations of SEA have been reported and that training has been provided to their personnel. The RC also certifies the same points concerning the RC's Office. At the same time, all UN entities are now required to report SEA allegations involving their own personnel to the UN Secretary General. The UN Resident Coordinator - in his/her capacity as the most senior UN official in the country, with accountability to implement the Secretary General's Bulletin on Sexual Exploitation and Abuse - sends the overarching management letter to the SG informing the UN Agencies' certification in-country (i.e. SEA cases reported by each UN agency and all-personnel PSEA training completed by each UN agency), as mentioned above.
- **Internal and Donor Reporting:** PSEA Network members are authorized to use their own consolidated statistics on reported SEA incidents for their internal and donor reporting requirements, while adhering to their internal reporting guidelines, as well as maintaining data protection standards of confidentiality and security.
- **Media and Other External Actors:** Due to the potential impact if data consolidated for the PSEA Network and the HCT is shared inappropriately, all information requests from the media and external actors will be carefully scrutinized. Any request for SEA CONSOLIDATED information including specification on how the data will be used, needs to be made in writing to the PSEA Network Coordinator. Approval for such information sharing is only provided by the RC.



Annex II: Nigeria: Inter-Agency Sexual Exploitation and Abuse (SEA) Complaints Referral System

- Survivor self-reports an incident of Sexual Exploitation and Abuse (SEA) or Survivor tells someone he/she trusts and the person (s) makes a formal complaint of SEA
- A staff/community member has a genuine concern/knows about SEA happening

Entry points for reporting include, but not limited to the following;

- Toll Free helplines/hotlines, Complaints and feedback boxes in camps and communities,
- Confidential email
- Women and Girls Friendly Spaces (WGFS); Child Friendly Spaces (CFS), adolescent/youth friendly spaces, school and learning centres,
- Health centres/facilities; Protection complaint desks; distribution sites,

Immediate response from person receiving complaint /allegation of SEA

- Provide a safe and confidential environment
- **Using the inter agency SEA intake and referral form, record only the necessary information.** PROTECT the form. DO NOT try to ascertain whether or not the allegation is true or to make any investigation into the allegation.
- Conduct an immediate needs assessment and refer survivor/complainant using the GBV referral pathway for medical, psychosocial and GBV case management services

Report the complaint confidentially to your agency PSEA Focal Point or Manager or Investigative Body, as soon safely as possible – Within 24hours*.

Where the agency reporting channel is compromised, not known, refer the complaint to **PSEA Coordinator** nga.psea@humanitarianresponse.info as soon as safely possible.

If the complaint implicates a staff member of the same organization; Refer complaint internally to the head of the organisation or investigative body

If the complaint implicates a staff member of a different organization; Refer complaint to the PSEA FP/investigative body of the accused person's organisation

If the complaint is a rumour or alleged perpetrator(s) affiliation unknown; Refer internally to the organisation and alert the PSEA Coordinator to ensure the task force takes necessary measures

If the complaint implicates a member of the local community inform complainant of relevant options including reporting to the police if appropriate and survivor is interested in this option

Complaint implicates a security actor: For Nigeria Police Force (NPF) Call PCU – 08057000001, 08057000002; SMS and WhatsApp: 08057000003;

For Nigeria Security & Civil Defence Corps: Call PCR 08033941284, 08033941284

For military, CJTF or Gov't Official refer to nga.psea@humanitarianresponse.info

Investigation initiated in line with IASC & agency investigation policy. Agency carries out relevant administrative and disciplinary measures. Provide **feedback** to the survivor/complainant.

Through the PSEA Coordinator, **the RC/HC should confidentially be notified** that an allegation has been received at the time of referral and Agency of Concern provides a **progress report to the RC/HC** at completion of the process.



Annex III: Inter-Agency SEA Complaint Intake and Referral Form

GUIDANCE FOR RECEIVING, RECORDING & REFERRALS

In the event you have been approached by a community member or colleague (either from the same organisation or not) with information regarding an incident of Sexual Exploitation and Abuse (SEA), pay attention to the following while receiving the complaint:

- *React calmly and listen carefully to what is being said.*
- *Reassure the complainant that he or she has right to raise the concern.*
- *Seek consent and address issues of confidentiality (see SOPs for PSEA - key principles), staff members are obliged to report complaints, while reassuring the complainant that information will be kept confidential and only be shared on a “need to know” basis*
- *Ask only relevant questions required to gain a clear understanding of the complaint so that it can be passed on via [AGENCY NAME]’s reporting procedures.*
- *Ensure that the survivor/complainant’s safety is not at risk.*
- *Consider (prioritise) the survivor’s need for services including medical attention and use the available GBV referral pathway if available or seek advice from a GBV specialist.*
- *Recording of information, suspicions or concerns needs to be as clear as possible, as it may be used in subsequent disciplinary or legal action. i.e. Correct names of all involved, identity numbers of witnesses, victims, and if possible photo records of the subject.*
- *The nature of the complaint. An accurate account of what was said by the complainant in her/his own words. A description of any visible sign of abuse or other injuries including a body map, maybe helpful.*
- *Key observations while receiving the complaint: Times, locations, dates given, whether anyone else knows or has been given information, whether survivor has accessed services.*
- *Inform the complainant of the next steps in the procedure.*
- *Report the complaint (using the form below), as per the agency reporting procedure, at the earliest opportunity.*

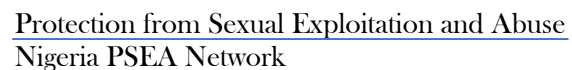
PLEASE NOTE THIS INFORMATION SHOULD BE KEPT CONFIDENTIAL



Inter-Agency SEA Complaint Intake and Referral Form

Name of Complainant:		Nationality:
Address/Contact Details:		Position/Identity Number:
Age:	Sex:	
How does complainant prefer to be contacted? (Give details)		
Name of victim/survivor (if not the complainant):		Nationality:
Address/Contact Details:		Identity No.
Age:	Sex:	
Name (s) & address of parents/legal guardian, if under 18:		
Has survivor given consent for completion of this form? YES: <input type="checkbox"/> NO: <input type="checkbox"/> I DON'T KNOW: <input type="checkbox"/>		
Is the victim/survivor receiving any type of humanitarian assistance? (Name the organisation/agency providing assistance):		
Date of incident(s):	Time of incident(s):	Location of incident(s):
Brief description of incident(s) in the words of the survivor / complainant:		
Briefly describe service (s) provided to survivor:		
Is the perpetrator a continuing threat to the safety of the survivor, complainant, staff or any beneficiary? Please explain any safety concerns:		
Name of accused person(s):		Position / Job title of person(s):
Agency accused person(s) works for:		
Address or location where accused person(s) works:		
Agency receiving complaint:		
Name of person completing form:		Position / Job title:
Signature:		Date:
Referral to Agency of Concern PSEA Focal Point		
Name of agency / name of person (PSEA Focal Point) report forwarded to:		Date of referral:
Name and position of person report forwarded to:		
Acknowledgment of receipt		
Name & Position / Job title:		Agency:
Signature:		Date received:

Send Completed form to the following confidential email address: nga.psea@humanitarianresponse.info



Annex IV: Nigeria PSEA Network: Case log of Reported SEA Cases

[illegible]



Annex V: Template for Inter-Agency Quarterly PSEA Report

Name of Agency:		Period Covered by Report: From: _____ to _____ (dd/mm/yyyy)	
Name of Person Completing Report:		Name of PSEA Focal Person:	
Number of SEA Complaints Received by agency	<ul style="list-style-type: none"> Number of SEA Complaints Received: Adults.....Children..... Number of SEA Complaints Investigated: Number of cases referred to relevant agency for investigation..... Number of survivors supported or referred for assistance..... 		
Who made the reports? (Indicate Numbers only)	<ul style="list-style-type: none"> Witness: Service provider/another agency on behalf of survivor: Survivor: Other (Please specify)..... 		
Who are the alleged perpetrators*? (Indicate Numbers only)	<ul style="list-style-type: none"> UN: International NGO: National NGO: Government official: Security actor: Military....Police:.....NSCDC.....CJTF..... Other (Please specify)..... 		
Type of SEA reported/received? (Indicate Numbers only)	<ul style="list-style-type: none"> Rape:..... Sexual assault..... Sexual harassment/intimidation: Actual or attempted exchange of sexual favours for (additional) services: (Rumour) of potential inappropriate relationship: Other (Please specify)..... 		
Overview of prevention and risk mitigation measures taken by your organisation to improve provision of humanitarian assistance and protection of affected communities and other individuals:			

Key Actions Planned by your Organisation/Agency (Include those towards supporting inter agency commitments)	Achievements/Progress	Comments/Recommendations for follow up
Outcome 1: The Humanitarian Coordinator and Humanitarian Country Team are supported at senior management and technical-levels to lead, oversee and deliver on PSEA Outcomes.		
Outcome 2: Safe, trusted, accessible, gender and child-sensitive mechanisms in place for reporting SEA that allow victims of SEA to report incidents, provide immediate care to victims and ensure they have access to appropriate avenues for recourse and redress.		



Protection from Sexual Exploitation and Abuse Nigeria PSEA Network

<u>Safe and accessible reporting:</u>		
<u>Quality survivor assistance:</u>		
<u>Accountability & investigations:</u>		
<i>Outcome 3: Aid workers and key stakeholders in humanitarian response, including the community understand and implement obligations for SEA prevention.</i>		

Challenges/ barriers encountered during implementation

Plans for Next Quarter

Signed:

Date:



Annex VI: Nigeria Protection from Sexual Exploitation and Abuse (PSEA) Network Terms of Reference (ToR)

Background

North-East Nigeria has witnessed an increase in violence since the beginning of 2015, causing a major humanitarian crisis. More than two million individuals have been displaced as a consequence of the intensification of attacks by on-going military operations and non-state armed groups attacks. Coupled with this, the risk of SEA and other forms of GBV continue to be a reality and remains one of the major manifestations of the conflict.

Transactional/survival sex, a form of Sexual Exploitation and Abuse (SEA) that occurs when sex is exchanged directly or indirectly for material support, is common in this context of extreme poverty. IDPs, women, single female headed households, adolescents, girls with disabilities, girl hawkers and those who are experiencing food insecurity are among the most vulnerable to experience GBV and are more likely to engage in survival sex. Survivors are also exposed to re-occurring abuse and continue to experience stigma and shame.

Humanitarian interventions, can compound existing risks, increasing power imbalances between men and women and exacerbate GBV and SEA. Among the key drivers include social norms that legitimate violence against women, lack of laws and policies to protect women and children from violence, weak or ineffective protection and response systems, among others.

Sexual exploitation and abuse (SEA) refers specifically to acts committed against members of the affected population by humanitarian actors, including international and national personnel of the United Nations (UN) and of non-government organizations (NGOs). SEA represents a failure on the part of humanitarian agencies to provide protection and care for communities, especially for the most vulnerable members of the population.

Given that ensuring a systematic and cohesive response to SEA in emergency operations requires strong coordination between humanitarian actors; the leadership of the humanitarian response in Nigeria, has elevated Protection from Sexual Exploitation and Abuse (PSEA) onto the humanitarian agenda to be discussed regularly.

Network Description

Nigeria's Protection from Sexual Exploitation and Abuse (PSEA) Network (hereinafter called the Nigeria PSEA Network or the Network) functions under the auspices of the Resident Coordinator (RC)/Humanitarian Coordinator (HC) to implement international commitments on PSEA including the Secretary-General's Bulletin (2003).⁷ The Nigeria PSEA Network will give regular reports to the Humanitarian Country Team (HCT) and to the Resident Coordinator (RC), who will have ultimate oversight of the network and may delegate regular oversight to the Deputy Humanitarian Coordinator (DHC) and Operational Humanitarian Country Team (OHCT).

Principles

The humanitarian community in Nigeria affirms the Inter-Agency Standing Committee's (IASC)⁸ 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

⁷ Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Sexual Abuse (ST/SGB/2003/13). Available at <https://oios.un.org/resources/2015/01/ST-SGB-2003-13.pdf>, accessed on 11 November 17.

⁸ 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).



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.

Membership

Network membership is open to all UN agencies, INGOs, IGOs and NGOs operating in North East Nigeria 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 Nigeria PSEA Network is open to all UN agencies, INGOs, IGOs and NGOs operating in N.E regardless of their internal PSEA procedures. Observer organizations may transition to full network membership, including voting privileges, by committing to develop complaint handling procedures for SEA. Sector Coordinators as well are encouraged to attend network meetings and will provide two-way coordination between their sector and the network. Participation in the Nigeria 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 N.E Nigeria 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 Network will advocate for the strengthening and/or establishment of internal complaint handling systems for all organizations operating in the Nigeria response, and will offer support as needed where such systems are not in place.

Responsibilities

Senior management within each organization is accountable for PSEA, and for ensuring that organizational processes and procedures supporting PSEA are in place, working effectively and are monitored and reviewed.⁹ The Nigeria 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 Nigeria PSEA Network will have strong linkages to the Inter Sector Working Group (ISWG), and will report on a regular basis to the ISWG coordinator and the UN Resident Coordinator for Nigeria. Network activities will follow a survivor-centred approach, and respect the principles of informed consent and the best interests of the survivor. As such, the GBV SS Coordinator will be a key technical member of the Network.

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

⁹ Secretary-General's Bulletin, as above n.1.



1. Management and Coordination: The network will be Co-Chaired by three agencies nominated by the HC/HCT representing UN, INGO & NNGO. Responsibility for PSEA activities will be divided equally amongst network members. The PSEA Coordinator will assist the co-chairs to manage and coordinate by:

- Liaising with IASC Task Team on Accountability to Affected Populations and PSEA/ Results Group 2
- 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 Nigeria PSEA Network on the first Tuesday 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 Nigeria
- Ensuring communication and awareness raising of beneficiaries' rights with UN, NGOs and other humanitarian partners
- Increasing capacity of humanitarian actors, including UN Staff, INGOs, NGOs, and government counterparts on prevention, protection and reporting SEA

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

- Liaising with the GBV and Child Protection Sub-Sectors to receive and refer victims of SEA for proper reporting and appropriate assistance services
- Working closely with assistance service providers in Nigeria to address the particular needs of victims of sexual exploitation and abuse and adopt appropriate procedures for providing redress.
- Advocating for and supporting mandatory regular training of all humanitarian workers in Nigeria on PSEA and complaint procedures
- Advocating with network members and partners to strengthen systems to prevent SEA, e.g. Human Resource practices, Implementing Partner engagements, 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 Nigeria by:

- Ensuring that agencies have effective internal complaints and investigation procedures in place which adhere to principles of confidentiality
- Establishing/strengthening the inter agency SEA complaint referral system between UN agencies, NGOs, and other relevant entities
- *Note:* The Nigeria 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 Nigeria response, 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 affected 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 behaviour of all humanitarian staff.

Endorsed by the Endorsed on 16th August 2017 by OHCT.

Revised Edition Endorsed by OHCT on 15th October 2019.



Annex VII: Terms of Reference for Focal Points on Protection from Sexual Exploitation and Abuse (PSEA) Background

Sexual Exploitation and Abuse (SEA) by aid workers is a grave violation of human rights and the Humanitarian Country Team (HCT) is committed to combat any kind of SEA by staff, non-staff personnel and partners. To this end, and in collaboration with the UN and NGO system wide approaches, entities should implement PSEA Strategies through a range of actions, including processes, tools and mechanisms to strengthen PSEA prevention and response, management and coordination. All humanitarian agencies, and personnel must be familiar with their respective responsibilities and take immediate action in accordance with applicable policies and procedures.

Role description

Under the supervision of his/her Head of Office, the entity's Focal Point for PSEA will coordinate the implementation of the agency level PSEA Strategy and the Secretary-General's Bulletin on Special Measures for PSEA at country-level. S/he will undertake this both within the respective agency and as a member of the Nigeria PSEA network. The Focal Point shall:

Prevention	<ul style="list-style-type: none"> • Ensure that the identity and role of the Focal Point is known throughout the organisation and the Nigeria PSEA network and that contacts are made widely available. • Provide training sessions on PSEA for all entity personnel, and implementing partners on a regular basis. • In coordination with the Nigeria PSEA network, provide awareness campaigns and sensitization for local communities on PSEA, with emphasis on what SEA is, beneficiary rights, where to report, complaint mechanism and victims' assistance. • Support country-level recruitment activities to ensure that procedures to guard against hiring of persons who have a record of sexual exploitation and abuse offences are put in place and applied. • Support programme managers in the implementation of the UN/IASC Protocols on Allegations of SEA involving Implementing Partners. • Serve as focal point responsible for assessing and mitigating PSEA related risks at the organizational level. • Make recommendations to management on enhancing prevention strategies, as appropriate.
Response	<ul style="list-style-type: none"> • Ensure that organisational procedures and mechanisms for reporting allegations of SEA are known to all field personnel, partners and as applicable, recipients of assistance and local communities. • May receive allegations of alleged incidents of SEA, regardless of the institutional affiliation of the alleged perpetrator. Once an allegation is received: <ul style="list-style-type: none"> ○ Immediately refer the allegation(s) to the entity's investigative unit; ○ Immediately – and in consideration of consent procedures – refer complainants to the victim assistance; ○ Ensure that all materials pertaining to the allegation(s) are handled in strict confidence; • Take appropriate measures to ensure safety and confidentiality for all visitors to the Focal Point.
Management and Coordination	<ul style="list-style-type: none"> • Assist the Head of Office to fulfil his/her responsibilities in accordance with ST/SGB/2003/13.



Protection from Sexual Exploitation and Abuse Nigeria PSEA Network

	<ul style="list-style-type: none">• Ensure the inclusion of SGB standards in contractual arrangements with non-staff individuals and entities, per ST/SGB/2003/13 Sec. 6.• Coordinate organisation's adherence to relevant accountability/compliance mechanisms, including contributing to the quarterly Nigeria PSEA Network report.• Represent entity in and collaborate with the Nigeria PSEA network members.• Coordinate with and participate in meetings of the entity's Focal point network.
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Profile

- The PSEA Focal Point must be a staff member of the entity. The Focal Point needs easy access to senior management and should therefore normally be appointed at a sufficiently senior level. Gender balance should be considered when selecting the PSEA Focal Point and Alternate.
- The above responsibilities shall be reflected in the terms of reference and performance appraisal plans of staff who act as PSEA Focal Points.

Required Competencies:

- Values: Exemplifying integrity, Demonstrating commitment to entity's and the UN/humanitarian system, embracing cultural diversity, Embracing change
Core competencies: Achieving results, Being accountable, Developing and applying professional expertise/business acumen, Thinking analytically and strategically, Working in teams/managing ourselves and our relationships, Communicating for impact
- Functional competencies: Demonstrated experience working directly with local communities, Fluency in the relevant languages, Proven communication skills.

Training:

Upon appointment, the Focal Point must undergo specific training on protection from sexual exploitation and abuse as guided by the manager, and their respective areas of responsibilities, as soon as feasible.

Note:

The role of the focal points is strictly limited to PSEA, issues related to Sexual Harassment are not part of this function. It is however dependent on the entity to harmonise these roles in accordance with internal policies.



Protection from Sexual Exploitation and Abuse
Nigeria PSEA Network

Annex VIII: Template - Nigeria: PSEA Focal Points and Alternates List

Please Note: This contact list will be updated every 6 months by the PSEA Network. Kindly send form highlighting the updated section for your organisation to nga.psea@humanitarianresponse.info

SN	AGENCY	FULL NAME	TITLE	EMAIL	TEL. NO

NOTE: In accordance with the IASC core principles and Section 3.2 of ST/SGB/2003/13, all humanitarian personnel have a duty to report all allegations of sexual exploitation and abuse. Reports must be made as soon as an allegation is received.

*While reporting within 24hours is emphasised, it's important that reports are made as soon as the person's feels safe to report; taking into consideration the complex security situation in some locations.