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LEBANON  
**STANDARD OPERATING  
PROCEDURES (SOPs)**  
PROTECTION FROM SEXUAL  
EXPLOITATION AND ABUSE

DEC 2020

**LEBANON**

INTER-AGENCY REPORTING, REFERRALS AND FEEDBACK ON ALLEGATIONS OF SEA

Endorsed by Lebanon Humanitarian Country Team, November 2020

Endorsed by Lebanon UN Country Team, December 2020

**Lebanon Standard Operating Procedures (SOPs)  
Protection for Sexual Exploitation and Abuse (PSEA)  
Inter-Agency Reporting, Referrals and Feedback on allegations of SEA  
Beirut Port Explosions Response<sup>1</sup>**

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<sup>1</sup> While these SOPs are initially developed to support the PSEA Network in reporting, referring and ensuring feedback on SEA allegations/incidents in the response to the Beirut Port explosions, the guidance, procedures and agreements will also guide and apply to safe reporting and inter-agency referrals SEA in other areas of the humanitarian and development response, until expanded SOPs and a full inter-agency CBCM is established.

## 1

## INTRODUCTION

This document is guided by the Protection from Sexual Exploitation and Abuse (PSEA) Strategy for Lebanon, endorsed in 2020 by the Humanitarian Country Team (HCT), which enshrines the principles of key global guidance developed by the IASC to strengthen and accelerate PSEA at the country level and the key guiding principles of the Secretary General's Bulletin ST/SGB/2003/13. The UN and its partners in Lebanon have a 'zero tolerance' policy for SEA and are committed to promoting an environment which effectively prevents and responds to SEA, including by applying collective global standards and commitments set by the IASC and UN.<sup>2</sup>

These SOPs aim to establish safe and ethical procedures for the handling of complaints of sexual exploitation of abuse (SEA) among UN agencies, NGOs and CSOs operating in response to the Beirut Port explosions, and to strengthen access to safe, confidential and survivor-centred reporting for affected communities. The SOPs will be reviewed and further updated, as part of developing and

establishing a comprehensive inter-agency Community-based Complaints Mechanism (CBCM)-PSEA for Lebanon, in consultation with relevant stakeholders and affected communities. As lessons are learned in the application of the SOPs within the context of the emergency response to the Beirut port explosions, the SOPs will be updated by the PSEA Coordinator and co-chairs in consultation with the PSEA Network, as required. Any substantive changes will be brought to the attention of the RC/HC and HCT for consideration and approval, as part of regularly reporting to the HCT on PSEA progress and challenges.

Overall, in addition to applying to the Beirut port explosions response, the guidance and procedures agreed in this document, will also guide PSEA efforts, reporting and inter-agency referrals SEA for other areas of the humanitarian response in Lebanon, until the SOPs are updated and in the implementation of an inter-agency CBCM. Additionally, and in line with the HCT PSEA strategy, further strengthening linkages and coordination with development and peacekeeping entities, as well the Government of Lebanon, on PSEA will be addressed going forward to ensure a harmonized and unified approach across all actors.

## 2

## PURPOSE AND ENDORSEMENT

The intention of the SOPs is to implement best practice of inter-agency reporting on PSEA as outlined by the IASC Global Standard Operating Procedures on Inter-Agency Cooperation in CBCMs-PSEA, as well as operationalizing IASC commitments on collective HCT and UNCT, as well as organizational and individual accountability on PSEA.<sup>3</sup> PSEA Network members are therefore strongly encouraged to implement the principles and framework as an example of best inter-agency practice and global commitments.

This document complements PSEA Network members' internal PSEA policies and procedures and provides guidance when reports of complaints need to be referred beyond one individual organization. The SOPs reinforce system wide, common action to prevent and respond to SEA. The document also provides a set of minimum guidelines for Network members and partners to strengthen internal SEA complaints handling, where required.

The SOPs shall take effect upon endorsement by the Lebanon HCT and UNCT and are complemented by an agreed Information Sharing Protocol (ISP) for confidentially sharing information on allegations of SEA (See Annex F). Following endorsement, all PSEA Network members are required to sign and adhere to the protocols and documents contained in these SOPs. HCT, UNCT and all PSEA Network members also commit to rolling out and implementing the SOPs and ISP with their implementing partners across the humanitarian and development response in Lebanon, including ensuring that partners sign the SOPs and ISP and are supported in effectively implementing requirements. Implementation will be monitored by the PSEA Network Co-Chairs and PSEA Coordinator and reported to the Resident and Humanitarian Coordinator.

2. Acknowledgements: In 2016, the Inter-Agency Steering Committee (IASC) Principals endorsed the Global Standard Operating Procedures (SOPs) on Inter-agency Cooperation in Community-Based Complaint Mechanisms, drafted collaboratively by sixteen organizations as part of the IASC commitment to developing operational tools and clear guidance for the field on agency commitments and activities to protect against sexual exploitation and abuse. Multiple country level SOPs and reporting frameworks for PSEA have also been consulted in the process of developing these SOPs, including Nigeria, Syria Cross-Border response and Myanmar.

3. See for example IASC Plan for Accelerating Protection from Sexual Exploitation and Abuse in Humanitarian Response at Country-Level, endorsed by IASC Principals on 3 December 2018, available at: [https://interagencystandingcommittee.org/system/files/iasc\\_plan\\_for\\_accelerating\\_psea\\_in\\_humanitarian\\_response.pdf](https://interagencystandingcommittee.org/system/files/iasc_plan_for_accelerating_psea_in_humanitarian_response.pdf); and Statement on Protection from Sexual Exploitation and Abuse, endorsed by IASC Principals on 11 December 2015, available at: [https://interagencystandingcommittee.org/system/files/principals\\_statement\\_on\\_psea\\_2015.pdf](https://interagencystandingcommittee.org/system/files/principals_statement_on_psea_2015.pdf).

## 3

## DEFINITION OF SEA AND SEXUAL HARASSMENT

**Sexual exploitation and abuse:** As per ST/SGB/2003/13, sexual exploitation and sexual abuse is defined as follows:

- a. Sexual exploitation means 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;
- b. Sexual abuse means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- c. 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 and provision of support for survivors.

Sexual exploitation and sexual abuse violate universally recognized international legal norms and standards and have always been unacceptable behaviour and prohibited conduct for United Nations staff. Such conduct is prohibited by the United Nations Staff Regulations and Rules, as well as core IASC and International Humanitarian Law and core humanitarian principles of 'do no harm'.

## 4

## SCOPE AND APPLICATION

This document applies to all PSEA Network member organisations that seek to operationalize the IASC global standard operating procedures for inter-agency cooperation in CBCMs among PSEA Network members, as well as to engage with other organisations and entities responding to the Beirut Port Explosions and other areas of the humanitarian response in Lebanon, to respond to allegations of SEA and to improve the overall protection environment.

Sexual harassment in the workplace is not included in the scope of these referral procedures.

The final responsibility to address a SEA complaint, follow-up on any investigation and take disciplinary action regarding confirmed misconduct **lies with the individual organization or agency.**

Specifically, the SOPs cover:

- Roles and responsibilities of key PSEA stakeholders;
- Key principles in preventing and responding to SEA;

- Receiving and assessing SEA complaints;
- Inter-Agency/common procedures for responding and referring SEA complaints;
- SEA survivor assistance provision and protection;
- Protection for whistleblowers and complainants;
- Investigations and feedback.

The SOPs cover all HCT, UNCT and PSEA Network members (see Annex E) and, will also cover implementing partners as the SOPs are implemented and endorsed across the response. The PSEA Network will further work to ensure strong linkages and engagements with other relevant stakeholders such as government agencies, security actors and CBOs to raise awareness, establish linkages, build internal capacity and systems for safe and confidential complaints handling. Trainings will be required at both the national and subnational level to support roll out and implementation of the inter-agency SOPs with all relevant actors, in particular partners that do not have internal technical capacity on protection/GBV/Child Protection.

## 5

## SEA RISKS IN THE LEBANON CONTEXT

Lebanon has a huge number of vulnerable people, including 1.5 million Syrian refugees, an estimated 180,000 Palestinian refugees<sup>4</sup> and refugees of other nationalities, increasing numbers of vulnerable Lebanese, undocumented migrants and migrant domestic workers, many of whom are dependent on humanitarian assistance. These factors, combined with a severe economic crisis with escalating poverty rates, public health crisis of the COVID-19 pandemic, and widening civil tensions, make Lebanon a high-risk context for sexual exploitation and abuse (SEA). The Beirut Port explosions which occurred on 4 August has further exacerbated existing vulnerabilities and risks of SEA, with over 300,000 thousand people affected by Beirut port explosions and many new actors, including the coordination role of the Lebanese Armed Forces (LAF) and wide range of smaller CBOs, faith-based organisations and volunteers, involved in the response.

In addition, the use of private contractors in the provision of services, risks posed by private landlords hosting large numbers of refugees and migrant workers, the risk of trafficking, including for sexual exploitation and abuse, and the role of faith-based organisations and religious figures, as well as private foundations in providing assistance and services to people in need of humanitarian assistance, many of whom have become increasingly dependent on aid as multiple and inter-connected crises deepen. Added

to this, cultural taboos, stigmatization of survivors of sexual violence and a weak legal system further adds to a fabric that disenfranchises survivors of sexual violence and pose barriers to reporting. Two extensive round of focus group discussions (FDGs) with affected people in 2015 and 2018,<sup>5</sup> along with an in-dept participatory research project implemented by Care in Lebanon and George Washington University in 2019 highlighted substantive SEA risks.<sup>6</sup>

In response to the mounting and complex needs in the country, the United Nations has a large international and national humanitarian and development presence with some 8,000 UN personnel, as well as large UN Mission presence, with over 10,000 military and civilian personnel. Around 6,500 INGO personnel and thousands of national NGO/CSO staff also work across the country with some 15,000 CBOs/national organisations registered with the Ministry of Social Affairs.

In view of the substantive and growing SEA risks, having a solid framework for implementing inter-agency efforts to prevent and respond to SEA, in line with global IASC and UN standards and commitments, particularly to ensure common principles are applied, a survivor-centered approach, clarity of roles and responsibilities and strengthened inter-agency cooperation.

## 6

## ROLES AND RESPONSIBILITIES

All humanitarian actors have the responsibility to:

- Maintain an environment that is free of SEA for all affected people, particularly vulnerable and marginalized communities;
- Adhere to the PSEA core standards and principles of the Secretary General's Bulletin ST/SGB/2003/13 and IASC guidance, and in accordance with organizational codes of conduct (CoC), directly addressing PSEA;
- Ensure that all affected people (women, girls, men and boys, regardless of ages, specific need, disability, status and nationality) have access to safe and confidential ways of providing feedback and raising complaints, including reporting on SEA;
- Report and refer known or alleged SEA incidents in good faith and by respecting confidentiality and the rights of all SEA survivors, particularly the best interests of the children in case of minors;
- Ensure survivors of SEA receive assistance and support, in line with their informed consent, and the UN Protocol on Provision of Assistance to Victims of SEA.

**Managers at all levels have a responsibility** to support and develop systems that maintain this environment, this includes but is not limited to:

- Ensure a PSEA policy, procedures and a country level action plan are in place for the organisation/ agency and that these documents are in line with the Secretary General's Bulletin and IASC global guidance;

4. Over 470,000 refugees are registered with UNRWA in Lebanon, with 180,000 estimated for planning purposes to be residing in the country: <https://www.unrwa.org/where-we-work/lebanon>

5. Two rounds of Focus Group Discussions were conducted with Syrian and Palestinian refugees in across Lebanon in 2018 and 2019. In May 2018, the Lebanon PSEA Network along with the SGBV TF members carried out across Lebanon a second round of consultations with groups of female and male Syrian and Palestine refugees. These consultations consisted of more than 30 FDGs, with over 300 refugees, from the ages of 15 to 65+.

6. Care in Lebanon and George Washington University Global Women's Institute, "Empowered Aid": <https://globalwomensinstitute.gwu.edu/empowered-aid>

- Appoint a senior level PSEA focal Point with clear roles and responsibilities, and alternate PSEA Focal Point, if not already;
- Where a CoC is not yet adopted, this should be put in place, explained to and signed by all personnel and volunteers (see PSEA Network sample CoC);
- Take appropriate actions to prevent and reduce the risk of SEA in their areas of operation, including through awareness-raising, training, SEA risk assessments, child safeguarding and other measures;
- Take disciplinary action in response to proven misconduct, in line with relevant internal administrative policies and procedures.
- Take steps to identify and effectively mitigate against SEA in all programme activities.

All actors involved in receiving and handling SEA complaints, in referral and/or follow up for survivors of SEA, or in the oversight of the PSEA Network (i.e. the “stakeholders”), hold additional collective responsibilities under global UN and IASC PSEA commitments. In the Beirut Port Explosions and other humanitarian response activities in Lebanon these stakeholders include:

**Resident and Humanitarian Coordinator (RC/HC) for Lebanon:** In line with existing PSEA responsibilities for Humanitarian Coordinators, the HC is responsible for ensuring the development of PSEA strategies and action plans for the Lebanon humanitarian response, including the installation of inter-agency complaint mechanisms, ensuring that survivors have access to appropriate, immediate and longer-term assistance and support, ensuring the coordination of inter-agency allegation referrals, reporting regularly to the Emergency Relief Coordinator (ERC) on PSEA in relation to humanitarian operations, and including PSEA as a standing agenda item at the Humanitarian Country Team and UN Country Team meetings.

**Humanitarian Country Team (HCT):** The HCT and Heads of agencies/organizations are accountable for implementing PSEA and for ensuring that organizational processes and procedures supporting PSEA are in place, working effectively, and are monitored and reviewed, in line with the IASC Minimum Operating Standards (MOS) on PSEA and global commitments to Accountability to Affected Populations (AAP). In particular, HCT members have the responsibility to:

- Ensure that all personnel within their agency have read and signed the institutional Code of Conduct (which should clearly cover PSEA), and that all personnel understand, acknowledge, and adhere to their organization’s internal SEA complaints handling procedures, internal reporting mechanism, survivor assistance and support policy and procedures, and understand disciplinary measures for the misconduct. All personnel, including volunteers, consultants and contractors, must be involved in the prevention and

response to SEA and all personnel, including newly recruited staff, should receive mandatory training on the Code of Conduct and PSEA. Staff involved in prevention of and response to SEA in particular should understand and sign a Code of Conduct (or similar) that adheres to international standards on PSEA, as well as receive training on gender-based violence (GBV) and PSEA, including principles of confidentiality, centrality of protection and best interests of the child in dealing with SEA cases, as well as GBV/SEA data protection and gender equality principles.

- Support PSEA focal points and ensure they have direct access to the Head of Office and agency headquarters to execute their functions, where required in consultation with the Head of Office or appointed Senior Management: a) Ensure that both human resources and programmatic sides are engaged in PSEA, and where applicable ensure field level PSEA Focal Points are appointed; b) Ensure that the designated focal points are actively engaged in the inter-agency CBCM-PSEA for the Beirut Port response and across the humanitarian response, and allotted time to regularly participate in the PSEA Network meetings, activities and reporting requirements; c) Incorporate PSEA responsibilities into PSEA Focal Point work plans and performance evaluations.
- Promote organizational/agency adherence to SEA prevention procedures as outlined in the IASC PSEA CBCM Best Practices Guide, including but not limited to: a. Due diligence to prevent re-recruitment of offenders; b. Ensuring that victim/survivor assistance and services are provided, in line with informed consent and the UN Protocol for Provision of Assistance to Victims of SEA; c. Forestalling retaliation for whistleblowing on SEA allegations; and d. Requiring adherence to PSEA clauses in all cooperative/partnership agreements; d) Ensure SEA risk assessments are conducted and mitigation measures are implemented in all programmatic activities under their responsibility.
- Raise the PSEA awareness and capacity of implementing partners (IPs) including contractors, volunteers and other third parties, from the moment they are selected, including but not limited to: a. Ensure that IPs have a clear understanding of what PSEA means and what their duties and responsibilities are in preventing and reporting cases and providing support to IPs to meet PSEA requirements; b. Encourage IPs to engage with the CBCM and create/strengthen their own PSEA policies; c. Include IPs in PSEA trainings, as much as possible, to ensure adherence and commitment to PSEA; and d. Where required and as appropriate, support IPs in internal investigations to ensure international standards are adhered to.

**Inter-Agency PSEA Coordinator:** The IA PSEA Coordinator is responsible for the overall management and coordination

of inter-agency PSEA activities in Lebanon, including oversight of the application of these SOPs. These responsibilities are carried out in close coordination of the PSEA Network and Co-chairs and PSEA Network members, who are responsible for supporting the implementation of the SOPs with implementing partners. The PSEA Coordinator will provide quarterly reports on PSEA activities and trends analysis of anonymized data on reported SEA cases to the RC/HC and HCT/UNCT.

**PSEA Network Co-chairs:** The Co-chairs of the Lebanon PSEA Network hold responsibilities in overseeing the implantation of the SOPs and the PSEA Network workplan, supporting on inter-agency referrals, where required, and covering the responsibilities of the PSEA Coordinator in his/her absence, in particular keeping the RC/HC and HCT/UNCT updated on the implementation of the SOPs and challenges to this, as well as supporting urgent interventions for SEA cases.

**PSEA Focal Points:** Focal Persons are appointed from within the PSEA Network member organizations and represent their agency in PSEA activities. All PSEA Network membership agencies and organisations should at a minimum have in place a senior level PSEA Focal Point and an alternate PSEA Focal Point to ensure coverage where the primary PSEA Focal Point is not available or away. Organisations should also consider appointing field level PSEA focal points to ensure accessibility for reporting at all levels and locations. For full PSEA Focal Point Responsibilities, please see Annex I.

**Lebanon PSEA Network:** This is an inter-agency technical body implementing the PSEA country programme and is a primary forum for PSEA coordination between organisations/agencies. The PSEA Network comprises the PSEA focal points from HCT and UNCT members - UN, INGOs and national NGOs. The Network is guided by a common work plan, endorsed by the HCT and UNCT, which the members are jointly accountable for implementing. Core responsibilities of the Network include, but are not limited to (see Annex J for full TORs):

- Develop and support the implementation of the PSEA country programme and ensure that PSEA collective PSEA efforts are in line with global IASC and UN standards and commitments
- Harmonize PSEA efforts between agencies for consistent approaches, messaging and to save resources, as part of an agreed common work plan with shared costs and responsibilities.
- Collectively roll out and implement these Inter-Agency PSEA SOPs;
- Conduct SEA assessments in high-risk areas;

- Develop and establish inter-agency CBCMs-PSEA across the response, including conducting community awareness activities and consultations with affected communities;
- Ongoing support and engagement with the inter-sector and sectors on PSEA mainstreaming;
- Develop and update inter-agency standard operating procedures and referral pathways to ensure timely and consistent survivor support
- Ensure PSEA is integrated across key interagency planning processes humanitarian community.
- Jointly developing an annual workplan for implementation of the PSEA country programme and regularly reviewing and updating, as required, the HCT PSEA Strategy.

#### **United Nations' role regarding Implementing**

**Partners (IPs):** UN entities are responsible for ensuring that implementing partners adhere to all PSEA protocols and standards and are allotted adequate resources to support minimum standards for PSEA.<sup>7</sup> Similarly, INGOs should support national NGO/CSO implementing partners in implementing SEA prevention and response measures in line with IASC standards and guidance.<sup>8</sup> It is the responsibility of implementing partners to promptly report allegations of SEA to the UN partner entity. The UN entity shall have the right to investigate SEA allegations involving aid workers engaged by implementing partners, notwithstanding related investigations undertaken by the implementing partner and/or national authorities.<sup>9</sup>

7. United Nations Protocol on Allegations of Sexual Exploitation and Abuse Involving Implementing Partners: [https://interagencystandingcommittee.org/system/files/un\\_protocol\\_on\\_sea\\_allegations\\_involving\\_implementing\\_partners\\_final.pdf](https://interagencystandingcommittee.org/system/files/un_protocol_on_sea_allegations_involving_implementing_partners_final.pdf)

8. See also the Core Humanitarian Standards (CHS) - <https://corehumanitarianstandard.org/>

9. In accordance with the United Nations Protocol on Allegations of Sexual Exploitation and Abuse involving Implementing Partners, 27 April 2018.

## 7

# KEY PRINCIPLES GUIDING SIGNATORIES TO THESE SOPs

All agencies and organizations agree to uphold the principles of **confidentiality, transparency, accessibility, survivor-centered approach, partnership, participation of affected communities, do no harm and the best interests of the child** when any allegation or complaint is made to their organization and in implementing the current procedures. In referring complaints, all agencies and organizations must maintain confidentiality and respect the reputation of the organization and of the individuals involved in an allegation or complaint. Organizations agree to receive complaints referred from another entity in good faith and in the spirit of cooperation and deal with it in a timely manner.

them, which is particularly critical in cases involving sexual exploitation and abuse (SEA). This includes the option of refusing assistance or support at any time, including after they have begun to receive it. They also have the right to request support again at a later stage if/when they choose to do so. Please see below pages, 10, 11 and 13 for special considerations for children and the best interest of the child.

**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

**Note on mandatory reporting of SEA and how it relates to confidentiality and the survivor's informed consent:** "While reporting SEA is mandatory, this obligation may in practice conflict with the principles of confidentiality and the right of the survivor to choose how they would like to address the incident. Agencies and organizations will need to internally reconcile this potential conflict, balancing both the right of the survivor and the safety of the individual and broader community. One possibility is to inform the survivor of the mandate to report SEA, while seeking informed consent to proceed." IASC Best Practices for IA CBCMs, p. 72

**Survivor-Centered Approach:**<sup>10</sup> A survivor-centered approach means that the rights, needs, and wishes of the survivor is prioritized. Every child and adult survivor of sexual exploitation and abuse has the right to receive services irrespective of whether they cooperate with an investigation or other accountability procedure, regardless of decisions by organizations or others to investigate the case and regardless of the outcome of an investigation. The survivor has a right to be treated with dignity and respect, choose the course of action in dealing with the sexual exploitation, abuse and violence, and receive comprehensive information to help them make their own decision instead of being told what to do.

All actions taken within the operations of this Mechanism will be guided by respect for choices, wishes, rights and dignity of the survivor. Allowing the complainant/survivor to make decisions about their case empowers

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.<sup>11</sup>

**The IASC and SGB/2003/13 core principles make it mandatory for all humanitarian workers who become aware of SEA to report immediately through established reporting mechanisms.** The survivor (or complainant, if different) should be informed that there are limits to confidentiality as soon as they come forward with an allegation, to the extent that all staff are obliged to immediately report complaints, while reassuring the survivor that information will only be shared on a "need to know" basis.

10. The term 'survivor' is used in this document and refers to survivors and victims, including alleged victims of SEA. The term 'victim' is often used in relation to survivors of SEA as this is the language used in United Nations General-Assembly mandated activities and is defined as an individual whose claims that they have been sexually exploited or abused by UN staff or related personnel have been established through a UN administrative process or Member States' processes, as appropriate. Source: UN Glossary on Sexual Exploitation and Abuse, 24 July 2018.

11. **Confidentiality of identities:** "The names of all parties to a complaint are confidential. The identity of the Subject of the Complaint must be protected, out of considerations of due process, potential retaliation, and presumption of innocence. It is imperative that the name of the survivor or complainant not be released to the Subject of the Complaint. In certain circumstances, a survivor's name may be revealed by the investigating agency – never the CBCM – to select persons under clear justification, for example to the administrative body conducting disciplinary review if there is insufficient corroborative evidence to pursue an agency investigation without his/her testimony. In such cases CBCM member agencies, in consultation with agencies' investigative units, may take additional reasonable measures to shield the survivor/complainant from potential retaliation or stigmatization." (81)

In all cases, it's important to facilitate informed consent of the survivor, without comprising the mandatory requirement for reporting. The survivor should be explained what information will be reported, who will have access to this information, what support is available and what potential follow up actions may be. This can provide the victim with an opportunity to reflect on what aspects of their case they may want to disclose or not. PSEA Focal Points should therefore be familiar with what information will need to be provided for their organization's internal procedures when handling a complaint.

In the event the survivor wishes not to be involved in an investigation and does not consent to disclosure of her/his identifying information, the survivors' access to services should still be prioritized and facilitated, upon consent, while the incident may be reported and referred without their personal identifying information.<sup>12</sup>

to those who need to know. Unauthorized disclosure of allegations may constitute misconduct. Staff must refrain from making public statements on the substance of a case or any proceedings. This includes commenting or posting on social media or any other platform of general public knowledge or access.

- To help ensure confidentiality, the survivor's name should not be used in any correspondence. Instead, a code (e.g. case code, numbers or other letters) should be used.
- The identity of the alleged perpetrator must also be protected, out of considerations of due process, potential retaliation, and presumption of innocence.<sup>14</sup> To protect against possible retaliation, the names of the complainant and survivor should never be released to the alleged perpetrator without the survivor's informed consent.<sup>15</sup>

Where a survivor has not given consent to share information, or if the survivor cannot be contacted, **there may be circumstances where the alleged incident is so severe that action must still be taken to report SEA without the survivor's consent.** **Unreported SEA cases** mean that perpetrators may continue to perpetrate SEA, putting the survivor and/or others, including children, at serious risk of abuse or other harm. This includes the risk of harm of the individual her/himself or others, or if a child is at imminent risk that could threaten his/her life and/or his/her development (Lebanese National Law 422, Art 25). **In such cases, the utmost care should be taken to protect the identity and ensure the safety of the survivor.**

While the survivor has the right to or not to be involved in the investigation process of the case, typically, at minimum, a complainant's, if different from the survivor, contact information is required for an investigation to take place. If the survivor is also the complainant and does not consent to disclosure of their personal information, they should be informed of the challenges to follow up and investigations.

**Note on informed consent:** Informed consent is the voluntary agreement of an individual based upon a clear appreciation and understanding of the facts and implications of an action, with no threat, coercion or false promise. Informed consent may be written or given verbally. Children are generally considered unable to provide informed consent (Coordinating GBV in Emergencies, 2019). However, children should always be involved in decision-making processes for decisions that affect their lives. Please refer to p. 13 below for further guidance on handling child cases.<sup>13</sup>

- Regarding confidentiality, where informed consent is given, disclosure of information should be restricted

- Where the survivor is a child, the name should never be disclosed to the alleged perpetrator.

**Accessibility:** Multiple channels should be made for complainants/survivors and other persons to raise allegations, report rumours and concerns regarding potential SEA cases. These channels must be accessible by all people, including those who are at increased risk (for example children, persons who are illiterate or may not speak the dominant languages, those with physical or mental disabilities or under restriction of movement), options should be available to be used by as many people as possible in areas with humanitarian and other operations, and communities should be informed of their rights and how to report SEA. Targeted efforts to remove barriers that may be specific to women, men, girls, and boys, as well as LGBTQI persons, migrant workers, and refugees, will ensure that mechanisms are accessible to all. This can include options for survivors to speak to someone of their preferred gender and in their preferred language. Outreach efforts which clearly articulate the range of channels that exist to receive complaints in confidential

12. Agency requirements may differ on the disclosure of personal identifying information, meaning that the PSEA Focal Point may be required to report this information internally but that the survivor will not be contacted for follow up/as part of investigations, without their informed consent.

13. For more information on informed consent in GBV case management and sample scripts, see the Interagency GBV Case Management Guidelines 2017, Chapter 2.

14. Universal Declaration of Human Rights (Art 11): "Everyone charged with a penal offence has the right to be presumed innocent until proved guilty according to law in a public trial at which he has had all the guarantees necessary for his defense."

15. Global Protection Cluster, GBV AOR, Handbook for Coordinating Gender-Based Violence Interventions in Emergencies, 2019, p 39. During an investigation, an alleged perpetrator may request to know the survivor's name. If the survivor has not given consent, this request should be refused and other facts should be used in order to present the specifics of an alleged incident without having to disclose the survivor's name. Investigative polices may differ between organizations and agencies.

ways should be communicated widely.

**Safety and well-being:** The safety of the survivor and/or complainant will be a primary consideration at all times during reporting, investigation, and thereafter. All actions taken under these SOPs will consider potential dangers and risks to all parties, incorporate ways to prevent injury and harm, address potential retaliation to survivors/complainants, and offer a safe space for reporting. **It is essential that a risk assessment be conducted for each survivor, and that a safety/protection plan be developed if necessary, based on individualized needs.**

**Transparency:** Members of the affected community will be educated on how to raise complaints and report allegations, may offer input to improve how such complaints and allegations may be raised and handled, **and will be kept informed and receive feedback on the outcome on a complaint or allegation raised, once available.** This will be available in multiple formats to ensure it is accessible to all, regardless of age, gender roles, literacy, language spoken or disability. In line with the principle of ensuring Accountability to Affected Populations, the community will be consulted on regular basis to build trust and ensure that existing mechanisms are effective and appropriate.

**Accountability:** Awareness will be systematically raised among community members about their rights, including their rights to make and withdraw allegations. Complainants/survivors will be kept informed about next steps related to their case, including investigation and referral to GBV services, and will be provided with information on any obligation for service providers to

report to the police, to enable them to make informed decisions.

**Non-discrimination:** All actors are bound to treat all complaints without discrimination, based on age, economic or social situation, race, status, disability, nationality, belief or political opinion, gender, sexual orientation or reputation. Special support should be provided for children and people with disability to ensure their ability to safely report. Allegations from children and persons with disabilities should be taken seriously and not undermined because of the age or the disability.

**Respecting the survivor's right to information and participation:** Actors should communicate with the survivor about all what is related to their cases and get their informed consent on all the processes whether legal, health condition, medical tests and interventions that need to be done. Particular support needs to be provided to people with disability and children. Thus, actors need to adapt the information according to the age and capacity of understanding of the survivors.

Child Survivors and the Best Interest of the Child: Keep the child safe, do no harm and ensure the best interests of the child: The principle of keeping the child safe or protecting the child, and doing no harm, is enshrined in articles 19, 32-36 and 38 of the Convention of the Rights of the Child (CRC), where the child has the right to be protected from all forms of violence, abuse, neglect and exploitation. This includes the right for the child survivor to be protected while PSEA procedures are applied from any internal or external form of violence, abuse, neglect or exploitation.<sup>16</sup>

## 8

# SEA COMPLAINT INTAKE, ASSESSMENT AND INTER-AGENCY REFERRAL PROCEDURES

It is the responsibility of all PSEA Network member organizations to ensure that safe, confidential, transparent, and accessible, including for groups who have specific needs, complaints and feedback mechanisms are available – or where needed established. Reporting mechanisms should be explained to affected populations so that all potential complainants know where and how to submit a complaint. Affected people should understand their right to free humanitarian assistance, their right to complain, and how they can bring a complaint forward in the manner most comfortable to them, as part of two-way communications with affected communities. The Lebanon PSEA Network will be working towards establishing

inter-agency community-based complaints and feedback mechanisms (CBCMs)-PSEA, across the response.

Complaints regarding allegations of sexual exploitation and abuse by a humanitarian/ development worker may be reported directly by the survivor or by anyone who has a suspicion or a concern, e.g. humanitarian personnel, refugees, host communities, vulnerable Lebanese, undocumented migrant workers, domestic migrant workers, among others.

For the Beirut port explosions response and for other areas of humanitarian and development response, complaints from affected people can be received from any CFMs/

<sup>16</sup> The principle of the best interests of the child is enshrined article 3 of the CRC stipulating the child's right to have his/her best interests taken as primary consideration. This right should be ensured in all decisions concerning the child with regard to providing, withholding or terminating any intervention. It should also be ensured in all decisions related to reporting cases of abuse or neglect. The child's best interests should be based on his/her physical, emotional, social and educational needs, age, sex, relationship with parents and caregivers, and his/her family and social background, and after having heard his/her views.

channels, these may include PSEA Focal Points, call centers, SMS platforms, agency-specific or coordinated hotlines, cluster referrals, community focal points, suggestion boxes, women's centers, child-friendly spaces, reception centers, community centers, gender-based violence referral mechanisms, and other safe spaces. Complaints may be submitted online or through paper, voice message, text message or in-person. CFMs are also established in other locations, at the national level and across the country, and should be accessible and able to safely and confidentially receive and refer SEA and other complaints, according to these standards and guidance.

To address gaps in the response and to ensure improved access safe, confidential reporting on SEA allegations for all communities affected by the explosions, ABAAD, in coordination with the Lebanon PSEA Network, will expand its multichannel CFM (hotline, WhatsApp, email, in person reporting) to act as a common CFM for SEA complaints and referrals, where required. Organisations/agencies that already have established CFMs will continue to promote and use these means of reporting and referring allegations; they may choose – or not – to adopt the ABAAD supported CFM. Agencies/organisations should strengthen mechanisms, where required, to ensure minimum standards for safe, confidential complaints handling and referral SGBV and CP services and assistance, are met in line with these agreed SOPs.

### **Guidance on SEA complaints intake**

All staff or PSEA Focal Points receiving a complaint pertaining to SEA should:

1. **Treat the survivor, or complainant, if different, with dignity and respect**, make them as comfortable as possible; always believe the survivor. Use a separate room to ensure privacy.
2. **Explain to the survivor/complainant the mandatory requirement to report on all SEA allegations.** If the survivor is the complainant, seek their informed consent to share information confidentially. If a survivor has not given consent to report the incident, there is nevertheless the obligation to report. Address issues of confidentiality, explaining that there are limits to confidentiality to the extent that agency staff are obliged to report complaints, while reassuring the complainant that information will only be shared on a strictly “need to know” basis (see above section on confidentiality, mandatory reporting and informed consent p.9 - 10).
3. **Get the basic incident information.** Avoid asking too many questions. Ask only the relevant questions required to gain a clear understanding of the complaint so that it can be referred to the appropriate agency's investigation unit/CFM or PSEA Focal Point. This typically consists of addressing: What, where,

when and who. Don't ask 'why'. Reporting should not be rushed, and complainants should be allowed to fully articulate the situation in their own words before clarifications are sought. Explain that it is not their fault and that they have the right to services and support.

If the person receiving the complaint, is trained and authorized to receive SEA complaints and on how to refer survivors of SEA via established SGBV/CP referral pathways (e.g. Protection, GBV or CP workers), they should proceed with the below steps. **If they are not trained, the staff member should directly refer to the organisation/ agency's PSEA Focal Point, who will take over the process:**

#### **4. For cases where the survivor is the complainant:**

- An immediate assessment of the survivor's health (prioritizing the need for CMR and/or other urgent medical services), safety, psychosocial and other immediate needs (e.g. food, clothing, transportation to access services and safe shelter) should be conducted.<sup>17</sup> Based on identified needs and the informed consent of the survivor, refer her/him to appropriate SGBV or CP case worker, in line with established referral pathways, including specific services if the survivor is a child. Confidential information regarding the case (including the name of the alleged perpetrator, organisation employing the alleged perpetrator, etc.) should not be shared with the SGBV/CP service provider. The IA Referral Form (Annex D) may be used for referrals to SGBV and CP service providers. The IASC SEA Intake and Referral Form (Annex C) should NOT be used for this, as this document contains confidential information regarding the incident.
- **Ensure that safety measures are applied and a plan to mitigate any risks of retaliation or harm are addressed** (e.g. relocation of the survivor to another location/safe space, if required). If there is no capacity to conduct a safety assessment, refer to the nearest SGBV or CP case worker for support. In the Lebanon context trained SGBV and CP case workers can provide dedicated support to SEA survivors, including children. It is important that caseworkers are also sensitized to the differing gender-specific needs and concerns of LGBTQI persons as well as women, men, girls, and boys.
- **It is primarily the responsibility of the organisation of the alleged perpetrator to ensure that the survivor is referred for required assistance/ services, with the informed consent of the survivor.** However, in cases where the allegation pertains to another UN/NGO entity, the organisation receiving the allegation should ensure the survivor is referred for assistance; this should not wait for the referral of the allegation to the other UN/NGO

17. Entities should 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.

entity. The organisation of the alleged perpetrator is responsible for continued follow up to ensure *all* required assistance and services is provided, including covering costs in cases assistance is not available via established SGBV and/or CP providers. Longer-term assistance can include comprehensive health care, ongoing psychosocial support, including mental health, access to legal assistance, livelihood support, skills training and education.

##### 5. In cases where the survivor is not the person reporting the incident:

- Do NOT seek out the survivor to provide assistance and services
  - Refer the information to the organisations the PSEA focal point, who in consultation with the **PSEA Coordinator, and if required, GBV/CP coordinators may:** Conduct GBV assessments and awareness-raising activities in targeted areas to inform the communities of SEA, their rights and of services available, with the aim of ensuring victims get the support they need and encouraging victims to report incidents.
6. Ensure that all information is well-documented during the in-person interview using the IASC Complaint Intake & Referral Form, so that the allegation can be immediately referred to the investigating agency/mechanism. A Focal Point or agency should limit the number of interviews conducted with survivors, as this can contribute to further traumatization and may jeopardize the investigation by potentially tainting evidence.
  7. Ensure the survivor is informed of the **option to report to the police**, where the case constitutes a criminal matter, and provide information regarding support available for this process.
  8. Ask the complainant how they would prefer to receive further communications about the case.
  9. **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 CFM. **Ensure the child is referred to a professional with the required training and skills in dealing with child survivors of sexual violence e.g. a Child Protection Worker with specialized GBV skills.** In the Lebanon context, all cases involving child survivors of abuse are coordinated with the Ministry of Social Affairs and the Juvenile Court. UNICEF or

another CP service provider can provide support on cases involving child SEA survivors, if needed.

**10. For female survivors**, always try to conduct interviews with female staff, including translators. For male survivors, ask for their preferences (a man or a woman) to conduct the interview. For survivors who identify as LGBTQI as well, seek their preference.

11. The above considerations and procedures also apply to complainants/survivors with mental health issues or intellectual disabilities. As in all cases, the wishes of the complainant/survivor must be respected as far as reasonably possible.

##### **Reporting complaints regarding personnel of the focal point's own organization or UN agency**

1. The staff member receiving the complaint should refer the complaint to organisation's established CFM or to the PSEA Focal Point of the staff member's own organization immediately or as soon as reasonably possible after receiving the complaint (within 24 hours).
  - If, for whatever reason, the staff member does not want to refer to the PSEA Focal Point, they should refer to a member of senior management, in accordance with internal policies, or the incident can be reported directly to the agency/organisation's Headquarter level complaints mechanism. If for good reason the staff member does not want to report to internal organizational mechanisms, she/he may report to the PSEA Coordinator and/or the one of the PSEA Network co-chairs, who will report the case to the agency/organisation's CFM at the global level and inform the RC/HC.
  - The PSEA Focal Point should report the incident information following the organization's internal procedures. The PSEA focal point should NOT conduct an investigation.<sup>18</sup>
2. The PSEA Focal Point should **identify whether the complainant/survivor has received assistance** through trusted assistance mechanisms, preferably via pre-established pathways, within 24 hours, and follow-up to resolve any blockages in case assistance has not yet been provided, while preserving confidentiality. Confirmation should be requested in that regard.
3. The PSEA focal point or person receiving the complaint should also inform the PSEA Network Coordinator or one of the PSEA Network co-chairs for monitoring of the case and provision of support on the case, if requested.<sup>19</sup> UN Heads of Agency may also directly inform the Resident Coordinator of the

18. Information about an incident or allegation is different to an investigation.

19. The IASC Global SOPs on Inter-Agency Cooperation in CBCMs notes that, where a member agency has an institutional complaints handling procedure that requires its staff to report all SEA allegations directly to his/her investigative unit at headquarters, **it is 'highly recommended that the investigating agency notify the CBCM Coordinator [i.e. the PSEA Coordinator] of the report for data tracking purposes, paragraph 4.2.2(b).** Furthermore, that 'based on status updates shared by the investigating agency, the CBCM will monitor to ensure that the complaint was received by the investigative unit, maintain current records on the status of each complaint, facilitate contact with and information flow to the complainant and/or survivor, and remain available to assist the concerned agency/organization throughout the next steps upon request... apprising the CBCM is highly recommended for transparency and accountability to the complainant/survivor, and for monitoring and evaluation purposes', paragraph 4.3.1.

case. Information shared should be non-identifying 'summary information for reporting' as per the Information Sharing Protocol (see Annex F).

4. It is the organization's responsibility to ensure follow up and support for the survivor and to keep the complainant (and if separate, the survivor) notified **in a safe and timely manner of the status and outcome** of an investigation, in accordance with the organization's internal protocols.
5. Signatories to the SOPs agree that action should be taken on all SEA cases taken within 24 hours for reporting and referral of survivors for SGBV assistance and support (where consent is given) and to apply relevant administrative measures, in line with organizational policy and procedures (including application of administrative leave) and on whether a case constitutes SEA and requires investigation, should be determined within 72 hours.
6. The PSEA focal point should take note of the date of reporting the incident to mandated management staff. PSEA Focal Points are responsible for receiving and ensuring follow up on any allegations of SEA, including when received on weekends and during holidays. If PSEA Focal Points are on leave, the alternate PSEA Focal Point should provide coverage during this period.
7. The PSEA Coordinator – or one of the PSEA Network co-chairs in the absence of the PSEA Coordinator – will send a confidential notification regarding the case to the RC/HC. This notification does *not* include identifiable information.
8. The organisations/agency of the alleged perpetrator is responsible for applying relevant administrative procedures, including, where required, administrative leave (suspension) of the alleged perpetrator, while an investigation takes place. Where it is assessed that there could be a continued risk to the survivor/ complainant and/or others, administrative leave should be applied as soon as possible. Administrative leave does not constitute admission of culpability, pending the outcome of internal investigative procedures.

***Inter-Agency SEA Referrals: Referral of complaints regarding a staff member/personnel of another organization or UN agency***

1. **For the Beirut port explosions response:** If the complaint is received via the ABAAD-managed call centre (hotline, phone/WhatsApp or complaints email); the ABAAD PSEA Focal Point will work with the PSEA Coordinator to do an initial assessment of the allegation to ascertain whether the case constitutes SEA and refer to the PSEA Focal Point in the concerned organisation/agency for follow up, according to internal protocols and procedures. This will be done

based on the SEA complaints intake form. In the absence of the PSEA Coordinator, the ABAAD PSEA Focal Point will work with the PSEA Network Co-chairs in this regard.

2. If the complaint is received through an established organizational/agency CFM, the staff member receiving the complaint should refer the complaint directly to the alleged perpetrator's organizational complaints reporting system (e.g. reporting email or hotline), if known.
3. If the alleged perpetrator's organization complaints reporting system is not known, the staff member should refer the complaint to the PSEA Focal Point of the staff member's own organization (PSEA Focal Point 1) immediately or as soon as possible after receiving the complaint (no later than 24 hours following receipt).<sup>20</sup>
4. If, for whatever reason, the staff member does not want to refer to the internal PSEA focal point, they should refer to either the PSEA Network Coordinator or one of the PSEA Network Co-chairs for assessing and referring the complaint.
5. PSEA Focal Point 1 should refer the allegation to the PSEA Focal Point in the agency/organisation of the alleged perpetrator (PSEA Focal Point 2) as soon as reasonably possible and no more than within 48 hours of receiving the complaint, taking note of the date and requesting confirmation of receipt. Sample Inter-Organizational Complaints Referral Form. In case the organisation does not have an identified PSEA Focal Point or CFM, the case may be reported to the Head of the Organisation, unless there are circumstances that clearly indicate that this could be problematic or a protection concern ( See section below on non-standard cases).
6. PSEA focal point 1 should also inform the PSEA Network Coordinator or one of the Network Co-chairs of the case for monitoring and support, if requested. Please see ISP Annex F for non identifiable information to be shared.
7. PSEA focal point (2) of the alleged perpetrator's organization should report the incident information immediately following the organization's internal procedures. The PSEA focal point (1) and (2) should NOT conduct an investigation. The PSEA focal point (2) should as soon as reasonably possible and no later than 48 hours after receipt, acknowledge receipt of the complaint.
8. PSEA Focal Point (2) should **identify whether the complainant/survivor has received assistance** through trusted assistance mechanisms, preferably via pre-established pathways, within 24 hours, and follow-up to resolve any blockages in case assistance has not yet been provided.

20. This timeframe is recommended in the IASC Global SOPs on Inter-Agency Cooperation in CBCMs, at 4.2.2(b).

- 9. It's the responsibility of the organisation carrying out the investigation** (organisation of the alleged perpetrator) to keep the complainant (and if separate, the survivor) notified in a safe and timely manner of the status and outcome of an investigation, in accordance with the organization's internal protocols. The organization should also inform the PSEA Coordinator or either of the Network Co-chairs that the case has been reported to relevant investigatory mechanism, in accordance with internal protocols, and of any interim administrative measures applied, if applicable, as well as of the final outcome of the case. See ISP in Annex F for details.
10. Where the survivor does not consent to the disclosure of their identity to the organisation of the alleged perpetrator, feedback may be provided through the agency who received the original complaint or the PSEA Coordinator, if the survivor consents to this.
11. The PSEA Coordinator – or one of the PSEA Network co-chairs in the absence of the PSEA Coordinator – will send a confidential notification regarding the case to the RC/HC. This notification does *not* include identifiable information (see ISP).
12. Following an SEA incident, PSEA Focal Points should also consider how SEA risk mitigation measures can be implemented or strengthened in programming and where required with implementing partners (for examples through trainings, awareness with affected communities on how and where to safely report, changing programming modalities to minimize risks (e.g. increasing the number of female frontline staff, organizing distributions for groups of women, ensuring home visits involve mixed gender teams, etc.).<sup>21</sup>

**“Non-standard” scenarios:**

**The survivor's identity is unknown:** The case is reported by a third party who does not know the identity of the survivor, or the complaint is made anonymously. The allegation will still be referred to the appropriate unit in the concerned organization to determine if administrative follow-up or investigation is advisable. The agency may determine if investigation will be initiated according to investigation policies, if sufficient evidence has been provided and/or independent evidence on the allegation exists. The recipient organisation/agency will also inform the PSEA Network coordinator or one of the PSEA Network co-chairs for monitoring and support, as required. Concerned entities should not try to directly seek out the survivor. Awareness raising activities on PSEA and how/where to safely and confidentially report on SEA may be conducted in specific areas, if this information is available.

**“Up in the air allegations”:** If neither the survivor or alleged perpetrator is known, or if there is only a rumour of an SEA incident(s) or wider concerns re SEA in an area, the staff member should still inform the PSEA Focal Point

of their own organization. The staff member should not make further inquiries. The PSEA Focal Point should inform senior management in their own organization to assess the situation as to whether or not there is sufficient information for an investigation to take place. The PSEA Focal Point should also inform the PSEA Network Coordinator or the PSEA Network Co-Chairs. In consultation with the agency/organisation who received the allegation, and if there are no internal means for following up or conducting an investigation, the PSEA Coordinator and/or Co-Chairs, may form a small group to determine follow-up steps that can be taken regarding the rumours – this should not constitute an investigation. Actions may include, but are not limited to, awareness raising on PSEA with affected communities and staff in the area, engaging with organisations working in the area on ensuring Codes of Conduct (PSEA) are in place; seeking information from community level protection workers, etc. SEA rumours should be reported to the PSEA Coordinator and/or Co-Chairs in all cases.

**Allegations pertaining to organizations that are not PSEA Network members or implementing partners of Members:** Recognizing the high number of community CBOs/CSOs, faith-based charities and volunteers engaged in the response to the Beirut port explosions – and elsewhere in the country - allegations may be received regarding actors that are not part of the PSEA Network or are implementing partners of the UN or INGOs. In case such allegations are received, these should still be reported to the organisation's Head of Office and/or PSEA Focal Point, if available, who should inform senior management in their own organization to assess the situation as to whether or not there is sufficient information for an investigation to take place.

The PSEA Focal Point should also immediately inform the PSEA Network Coordinator and/or the PSEA Network Co-chairs. In consultation with the agency/organisation who received the allegation, the PSEA Coordinator and/or Co-Chairs, may form a small group to determine follow up steps that can be taken regarding the allegations – for example to collect readily available information and determine possible lines of reporting and/or actions to take. This should not step into the realm of an investigation.

Where appropriate, and in line with safety and confidentiality requirements, the complaint should be raised with the Senior Management/Head of Office of the organisation employing the alleged perpetrator. If it is not possible to report to the Head of the Organisation (for example in cases where the Head of the Organisation is implicated), the case may be reported by the PSEA Focal Point or Head of Organisation of the entity who received the allegation – or by the PSEA Coordinator, with agreement from the RC/HC - to the Board of the Organisation implicated, if this exists and/or to the police, if the survivor consents. In cases where the survivor does not consent to the disclosure of their identity and to taking part in an investigation, he/she should be informed options and

21. Contact the PSEA Network Coordinator or Network Co-Chairs to receive the SEA risk assessment and mitigation check list.

challenges to taking the case forward, to make an informed decision. The RC/HC should also be kept apprised of such cases and may advise of specific measures to be taken for individual cases.

The PSEA Network, including through trainings, outreach and IEC materials and by the activities by all Network members involved in the response to raise awareness on PSEA and reporting on SEA, are all committed to strengthening engagement community level actors to improve their understanding of PSEA and humanitarian principles and codes of conduct.

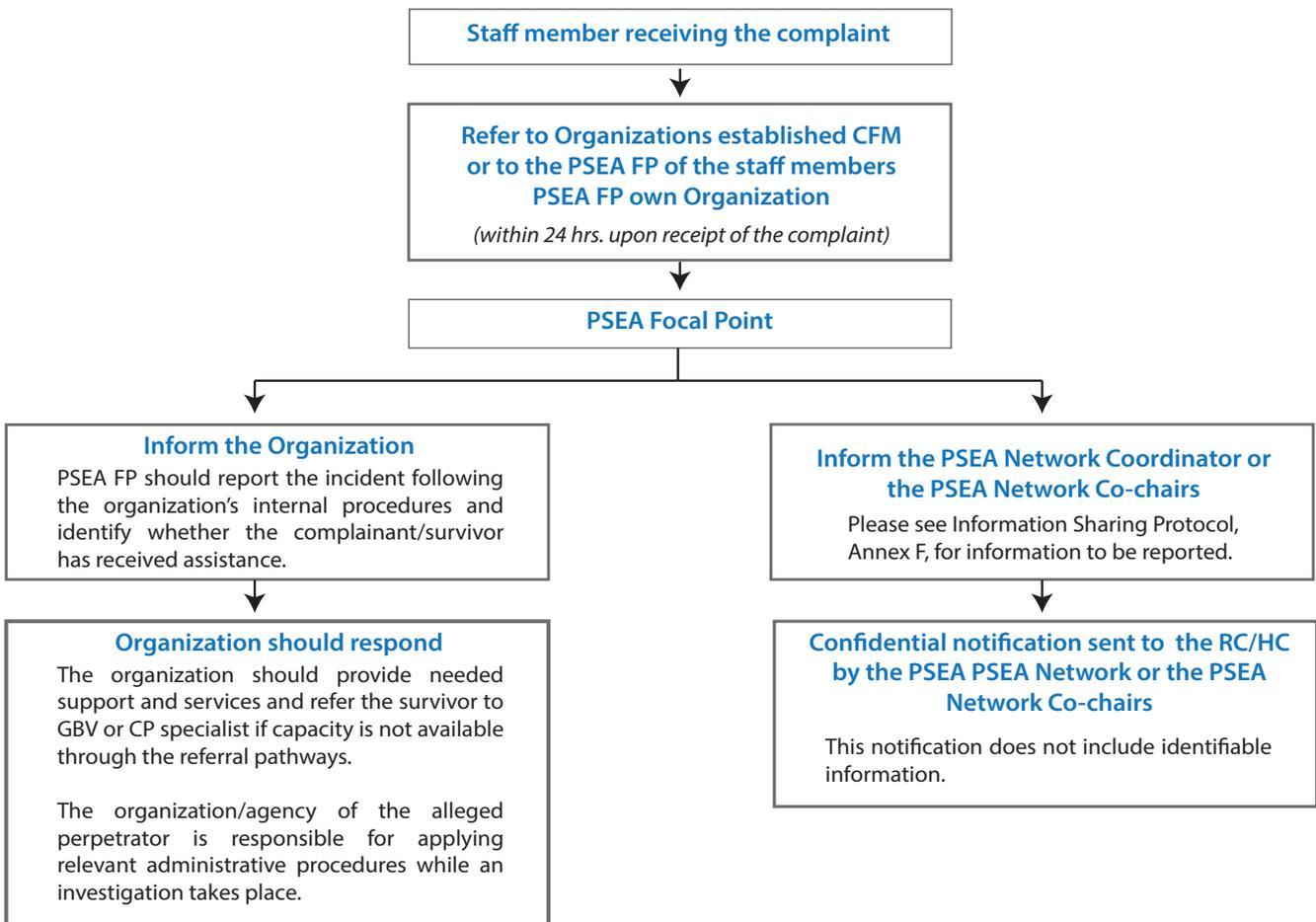
**Local community:** If the complaint implicates a member of the local community, the recipient should inform the complainant/survivor of relevant options, including reporting to the police, if appropriate and if the survivor consents to informing police/ national authorities. Support for referral to SGBV services providers, via established SGBV and CP referral pathways and in line with informed consent, should also be provided. For complaints related to community members mobilized by UN or NGOs, the complaint should also be reported to the CFM or PSEA Focal Point in the organisation implicated for internal follow up. Organisations have a responsibility to inform community members and leaders whom the work with/mobilise regarding codes of conduct and PSEA.

**The complaint pertains to security actors:** If the complaints pertains to the military, the complaint will be referred to the PSEA Coordinator or the PSEA Network Co-Chairs, who will liaise with the CMCoord Team to refer to the Senior level focal point for the Lebanese Armed Forces. Should military actors receive allegations of SEA pertaining to UN or NGO personnel, for example via the Forward Emergency Room (FER), such cases may be reported to the PSEA coordinator (or co-chairs), who will refer the case to the relevant UN/NGO. The PSEA Coordinator may seek the support of OHCHR to refer allegations where required, for example where language may pose a barrier.

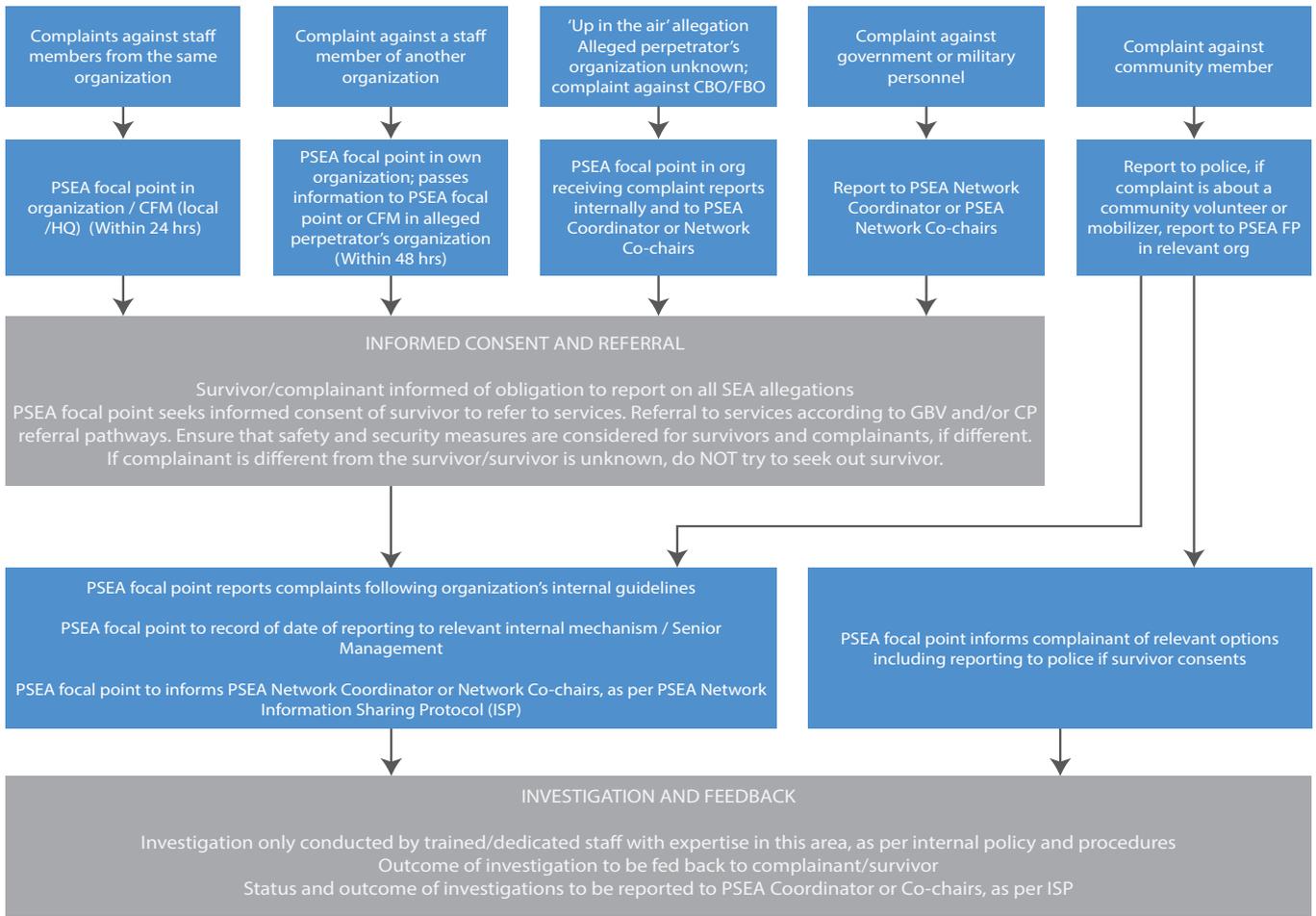
**The complaint pertains to Government personnel:** Should an allegation of SEA pertaining to Government personnel be received by UN/NGO entities, the allegation should be reported to the PSEA Coordinator, who will liaise with the RC/HC and Head of the Resident and Coordinators Office (RCO) to confidentially raise the allegation through the most appropriate channel with relevant government entity.

**UNIFIL/UNSCOL:** Allegations pertaining to UNIFIL personnel or UNSCOL personnel may be reported to the PSEA Focal Points in these entities and/or to OIOS. Please see below, Annex I for further details regarding reporting and investigations involving UNIFIL/UNSCOL personnel.

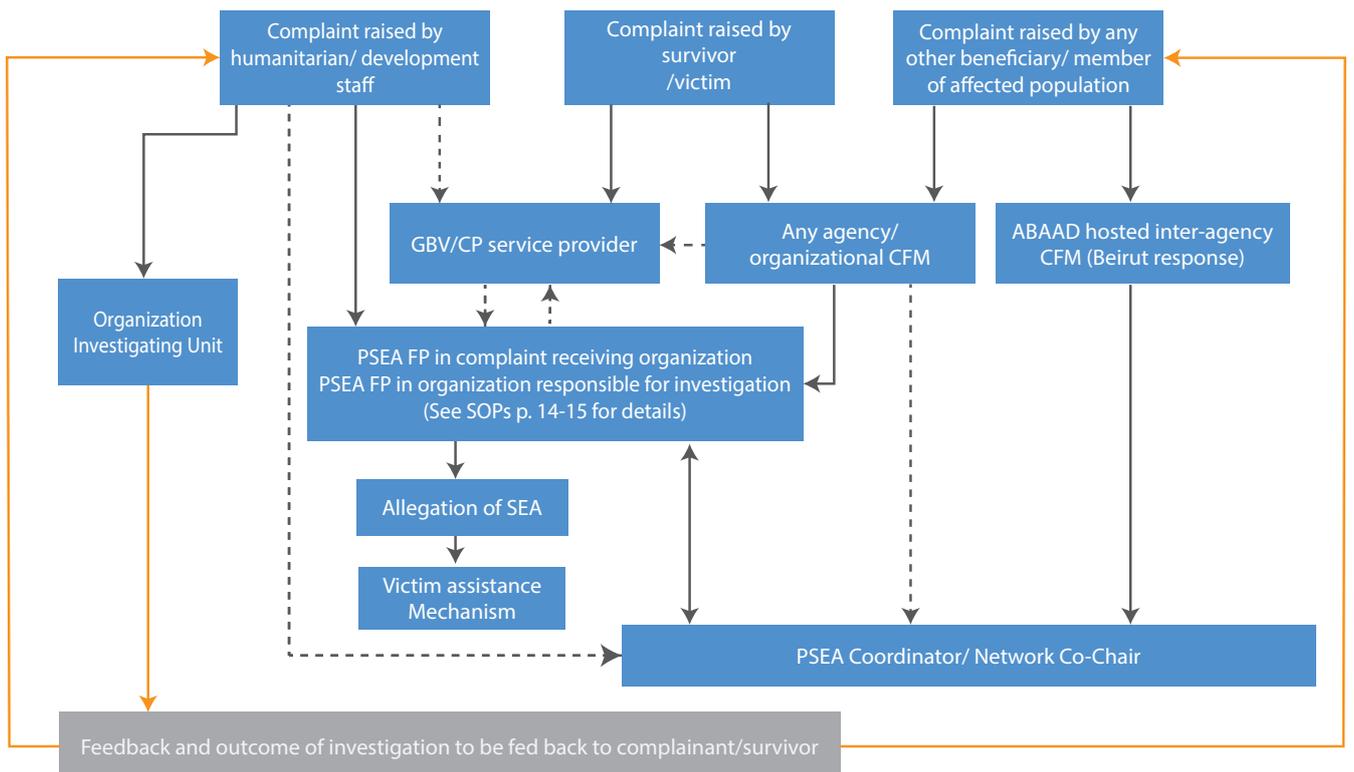
Reporting complaints regarding personnel of the PSEA Focal Point’s own Organization or UN Agency



### SEA Complaints Process



### Inter-Agency information Flow



## 9

# INVESTIGATIONS

All signatory entities agree to always prioritize the safety 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. ensuring respect confidentiality regarding the alleged perpetrator, facilitate the alleged perpetrator's access to information, and the possibility to be heard).

Investigations of complaints or allegations of sexual exploitation and abuse should be undertaken exclusively by dedicated, trained and experienced 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.<sup>22</sup>

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. Investigation processes should seek to limit the number of times survivors are interviewed regarding a particular case (as best practice as survivor should be interviewed no more than two times – on the complaint intake and as part internal investigations), noting the serious risk of further traumatizing survivors, in particular children or persons with specific needs. **See section above for special considerations regarding children and seek guidance from child protection actors and/or specially trained investigators for cases involving children.**

**Protection of victims and witnesses:** Entities are encouraged, in respect of confidentiality and the wishes of the survivor, as well as in line with their internal accountability framework and complaint mechanism systems, to alert the PSEA Coordinator or PSEA Network Co-chairs, on possible risks for individual affected community members to ensure that adequate protection for survivors and witnesses is ensured from the start of the individual agency's investigation. A dedicated case management worker may prepare and accompany survivors during interviews as part of the investigatory process, if the survivor requests this. SGBV and CP service providers can provide technical support to ensure that an adequate safety

plan is put in place, in line with the wishes of the survivor, complainants and/or witnesses. **Agencies/organisations should be committed to providing ongoing and timely feedback, in a safe manner, to survivors/complainants on the status and outcome of the case.**

**Lack of internal investigations capacity:** In the event an agency may lack the capacity to investigate internally, the PSEA Coordinator, upon request from the concerned organisation, can support the agency to identify PSEA-trained investigators from global investigation rosters, where possible—at the cost of the requesting agency. Financial support for investigations may also be requested from the IASC Fund for SEA allegations, managed by OCHA at the global level. For UN and INGO implementing partners, the organisations may request the support of these entities to carry out investigations if internal capacity and expertise is not available. **All UN implementing partners are obliged to report any allegations of SEA to the UN entity/entities.** Feedback to complainants/ survivors is a two-fold responsibility: it is part of the required outcome of agency investigations under international commitments, and it is part of survivor assistance. Ideally, feedback should be given in writing to avoid confusion and/or differing interpretations.

Recognizing that internal investigations capacity and procedures is a gap for many local humanitarian actors, the Lebanon PSEA Network, in line with its action plan, will work towards establishing a pool of independent investigators at the national level. This resource may, at the request of the concerned organisation, provide support to internal investigations, where this is a gap.

Where appropriate and warranted, consideration should be given to conducting **joint investigations** in the interests of information and resource sharing, as well as limiting the number of interviews necessary.

Where a case constitutes a criminal matter and where the survivor consents, the case should be reported to the local authorities for investigation and prosecution. In such cases, the relevant entities will fully cooperate with the local authorities, in accordance with respective agency / organizational policies and procedures and national laws. A risk analysis, and appropriate safety measures should be applied, to ensure the safety and protection of the survivor. Survivors are also entitled to legal assistance and representation, where required.

22. The Lebanon PSEA Network will develop further guidance on the principles guiding safe, survivor centered investigations, which, once finalized, will be included as an annex to these SOPs. See also the CHS alliance investigations guidance <https://www.chsalliance.org/get-support/resource/guidelines-for-investigations/>

## 10

## SUPPORTING THE NEEDS OF SURVIVORS, COMPLAINANTS, WHISTLE BLOWERS AND WITNESSES

All entities are responsible for the actions of their personnel and all entities agree to a comprehensive approach to ensure that the protection needs of anyone involved in a complaint are fully considered and provided.

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 of mandatory reporting on all SEA allegations to help prevent harm and abuse for all.** 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 interests of the survivor, while ensuring safe access to applicable criminal procedures.

Entities must consider both the immediate and 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 blower, witness and subject of the complaint.

**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 CoC, rules and regulations regarding SEA, even if following an investigation, it proves unfounded. And if personnel knowingly and willfully 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 who report such allegations/misconducts from within their agency and the PSEA Network will support each other to ensure that retaliation between entities is prevented and managed.

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.

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## 11

## CHALLENGES TO IMPLEMENTATION

In cases where challenges in implementing the SOPs are raised, a process will be followed to discuss the matter and determine appropriate actions to be taken and address the issue in order to facilitate on-going information sharing and referrals. A meeting will be convened including the PSEA Focal Point(s) of the relevant entities and the PSEA Coordinator/Co-chairs to discuss the matter and to determine appropriate actions to be taken within two weeks from the identified challenges in the implementation. If unresolved, the matter should be referred to the Senior Management within a week,

including the RC/HC who will address the matter. The HCT commits to attend ad hoc meetings, as necessary, to address unresolved PSEA issues.

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.

**12**

## **PARTICIPATION AND SIGNATURE**

This SOP shall be open for signature by humanitarian agencies on an on-going basis. Organisations will signify their interest to the PSEA Network Coordinator, within the office of the RC/HC or PSEA Network Co-Chairs, who will take the necessary steps to formally accept new agencies/ organisations in the SOPs and the PSEA Network.

All signatories to these PSEA Standard Operating Procedures are committed to 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 the principles and best practice standards defined in this document;
- Apply the standards and agreements for Inter-Agency Reporting, Referrals and Feedback on SEA allegations defined in this document;
- Adhere to or demonstrate a commitment to achieving the appropriate compliance with the relevant data protection standards.



## ANNEX A

## KEY DEFINITIONS

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

**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, gender, age, disability and diversity 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.

**Complainant:** A person who brings an allegation of SEA to the CBCM in accordance with established procedures. This person may be a 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.

**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) or as a member of the LGBTQI community. The procedures in this document only cover SEA complaints.

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

**Implementing Partners:** Entities or organizations that operate at country level, in accordance with established

UN, IO or NGO procedures, to provide services and deliver assistance. Staff of, and all those employed by, an implementing partner are “humanitarian aid workers” for the purposes of these SOPs.

**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 personnel of humanitarian agencies and organizations, including UN agencies, IGOs, NGOs, implementing partners, and relevant CBOs/CSOs 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. For the purposes of these SOPs, development workers working for the UN, INGOs and CBOs/CSOs, as well UN peacekeeping personnel, both military and civilian, are also included in this definition of personnel.

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

**Recipients of humanitarian or development assistance:** and services 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, including vulnerable Lebanese. Sexual exploitation or abuse of any beneficiary is SEA; however, the individual need not be in a vulnerable position; a differential power or trust relationship is sufficient to establish SEA. Migrant workers, in particular undocumented migrant workers and other vulnerable groups may also be subjected to SEA.

**Staff:** For the purposes of these SOPs, “staff” of an organization is any person who works for or represents that organization, whether or not she/he is compensated monetarily and regardless of the type or duration of their contract. (see also “Implementing Partners”).

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

**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 the term “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.

**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 or development 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 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.

## ANNEX B

# SIX CORE PSEA PRINCIPLES OF THE SGB/IASC

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 defense.
3. Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior 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

**ANNEX C****SAMPLE INTER-AGENCY SEA COMPLAINTS REFERRAL FORM**

All information should be kept confidential and all forms password protected. All complainants – and survivors, if different – should be informed of mandatory reporting requirements on SEA.

This form should not be shared with SGBV / CP service providers.

Name of Complainant:		Nationality:	
Address/Contact Details:		Position/Identity Number:	
Age:		Sex:	
How does complainant prefer to be contacted? (Give details e.g. phone number, etc.)			
<b>Information pertaining to the survivor</b>			
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:                      No:                      Don't know:			
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 (if any):			
Is the perpetrator a continuing threat to the safety of the survivor, complainant, staff or any beneficiary? Please explain any safety concerns:			
Has the survivor, or does the survivor, wish to report the incident to the police?			
<b>Information pertaining to the alleged perpetrator(s)</b>			
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:			
<b>Agency receiving complaint:</b>			
Name of person completing form:		Position / Job title:	
Signature:		Date:	
<b>Referral to Agency of Concern PSEA Focal Point</b>			
Name of agency / name of person (PSEA Focal Point) report forwarded to:		Date of referral:	
Name and position of person report forwarded to:			
<b>Acknowledgment of receipt</b>			
Name & Position / Job title:		Agency:	
Signature:		Date received:	

## ANNEX D

## LEBANON SGBV AND CP PATHWAYS

Lebanon referral pathways for Sexual and Gender-based Violence (SGBV) and Child Protection (CP) services providers across the country: Select this link to access SGBV & CP referral pathways.

The Inter-Agency Referral Assistance and Services Form should be used for referral of SEA survivors to SGBV and CP service providers for assistance and services.

Priority الأولوية	Date of Identification تاريخ اكتشاف الحالة	Referral Date تاريخ الإحالة
<p>Indicate the priority of the case so the receiving agency knows the timeframe to respond. Consider if there are indications of immediate risk to personal safety as expressed by the person being referred.</p> <p>تحديد أولوية الحالة حتى تعرف منظمة الاستلام الإطار الزمني للرد. خذ بعين الاعتبار إذا كانت هناك مؤشرات على خطر فوري على السلامة الشخصية كما عبر عنها الشخص المحال</p>		
<p><input type="checkbox"/> Fast-track (high risk) - serious imminent risk to personal safety (life-threatening situation) requiring immediate intervention within 1-48 hours</p> <p>الإحالات الطارئة- خطر وشيك على السلامة الشخصية (حالة مهددة للحياة) تتطلب التدخل الفوري خلال 1-48 ساعة</p> <p><input type="checkbox"/> Regular (medium/low risk) - likelihood of serious risk to personal safety requiring speedy intervention within 1-14 days</p> <p>الإحالات العادية (متوسطة / منخفضة المخاطر) - احتمال حدوث مخاطر خطيرة على السلامة الشخصية تتطلب التدخل السريع في غضون 1-14 يومًا</p>		

Referred By الإحالة من	Referred To الإحالة إلى
<p>Insert the contact information for the referring agency.</p> <p>أدخل معلومات الاتصال الخاصة بالمنظمة الإحالة.</p>	<p>Insert the contact information of the agency you are referring to</p> <p>أدخل معلومات الاتصال الخاصة بالمنظمة التي تقوم بالتحويل إليها</p>
<p><b>Sector:</b> القطاع</p> <p><b>Agency/Center:</b> المنظمة/المركز</p> <p><b>Location:</b> المنطقة</p> <p><b>Focal Point Name:</b> جهة الاتصال</p> <p><b>Email:</b> البريد الإلكتروني</p> <p><b>Phone:</b> رقم الهاتف</p>	<p><b>Sector:</b> القطاع</p> <p><b>Agency/Center:</b> المنظمة/المركز</p> <p><b>Location:</b> المنطقة</p> <p><b>Focal Point Name:</b> جهة الاتصال</p> <p><b>Email:</b> البريد الإلكتروني</p> <p><b>Phone:</b> رقم الهاتف</p>

Case Information (only include if consent has been obtained) معلومات الحالة (فقط بعد موافقة الشخص)	
Insert the basic biodata and contact information which is needed for the case to access the required service. Check the IS Service Mapping to see whether additional information requirements are needed to access the service. أدخل البيانات البيولوجية ومعلومات الاتصال اللازمة للحالة للوصول إلى الخدمة المطلوبة. تحقق من خدمة نظام الإحالة لمعرفة ما إذا كانت هناك حاجة إلى معلومات إضافية للوصول إلى الخدمة	
<b>Name:</b> الإسم <b>Address:</b> العنوان <b>Phone:</b> رقم الهاتف <b>Belongs to Whom:</b> صاحب الرقم <b>Preferred method of contact:</b> الطريقة المفضلة للاتصال <b>Preferred date/time for contact:</b> الوقت والتاريخ المفضل للاتصال	<b>UNHCR Case Number:</b> رقم الملف لدى المفوضية السامية للأمم المتحدة لشؤون اللاجئين <b>Age:</b> العمر <b>Sex: [F] [M]</b> الجنس [انثى] أو [ذكر]

Caregiver information (when case is a minor (below 18 years) (عمره أقل من 18 سنة) اذا كان الشخص قاصراً)
<b>Name of Caregiver:</b> اسم مقدم(ة) الرعاية <b>Relationship to Child:</b> صلة القرابة بالطفل(ة) <b>Address:</b> العنوان <b>Phone:</b> رقم الهاتف Caregiver informed of the referral? <input type="checkbox"/> Yes <input type="checkbox"/> No (If no, explain) هل تم تبليغ مقدم(ة) الرعاية عن هذه الإحالة؟ <input type="checkbox"/> نعم <input type="checkbox"/> لا (إذا كان الجواب كلا، الرجاء الشرح) _____

### Needs for specific services and assistance الإحتياجات الخاصة

Indicate the service/s which you are referring for. Please refer to the IS Service Mapping to ensure the service is available and the case meets the eligibility requirements for the service.

حدد الخدمة/ا التي تشير إليها. يرجى الرجوع إلى نظام الإحالة للتأكد من أن الخدمة متاحة وأن الحالة تفي بمتطلبات الأهلية للخدمة.

**Child Protection:** This can include children with specific needs, survivors of/ children at risk of abuse, neglect or violence, children taking care of siblings alone, child head of household, separated or unaccompanied children, children at risk of/early marriage, children engaged in the worst form of child labour – e.g. street-based, exploitative or physically dangerous work.

**حماية الطفل:** يمكن أن تشمل الأطفال ذوي الإحتياجات الخاصة، ناجين / أو المعرضين للإساءة أو الإهمال/العنف، المسؤولين عن رعاية أشقائهم من دون وصي، رب(ة) الأسرة، المنفصلين عن الأهل البيولوجيين/ غير المصحوبين من قبل وصي قانوني، المستخدمين في أسوأ أشكال عمالة الأطفال والمعرضين لخطر الزواج المبكر- على سبيل المثال: عمل الأطفال في الشوارع، والعمل الاستغلالي، والعمل الخطير جسدياً، وما إلى ذلك

**SGBV (Prevention and response including safe spaces and psychosocial support):** This can include survivor/ at risk of physical and/or psychological violence, abuse or neglect, exploitation, early marriage, tracking.

**العنف المبني على أساس النوع الاجتماعي (خدمات الوقاية والاستجابة للعنف المبني على أساس النوع الاجتماعي):** يمكن أن يشمل الناجي(ة) / المعرض(ة) لخطر العنف الجسدي و / أو العنف النفسي، الإساءة أو الإهمال، الإستغلال، والزواج المبكر الخ.

**Legal:** This can include family members arrested / detained / at risk of deportation, or in need of mediation with landlord, employer, service provider or support for other legal issues (i.e. residency, birth or marriage registration).

**قانونية:** يمكن أن يشمل أفراد الأسرة الموقوفين / المعتقلين / الصادر بحقه(ا) أمر مغادرة، في حاجة إلى الوساطة مع مالك الأرض/البيت أو صاحب العمل أو مزود الخدمة أو الحاجة إلى الدعم الفردي في المسائل القانونية (أي تسجيل الإقامة أو الولادة أو الزواج).

**Protection:** This can include persons with specific needs, such as older person or person with disability or person with serious medical condition unable to care for self and/or lacking a caregiver, single parent caring for dependents (<18 years or adult who needs a caregiver), persons facing specific protection risks (e.g. risk of eviction, security incident or harassment).

**الحماية:** يمكن أن يشمل الشخصا الذين لديهم احتياجات خاصة كالمسنين، أو الشخص ذو الإعاقة الذي يفتقر إلى مقدم الرعاية و / أو غير قادر(ة) على رعاية نفسه، والأفراد الذين يواجهون مخاطر حماية معينة (مثل خطر الإبعاد، المضايقة من قبل أفراد المجتمع / السلطات، وغيرها).

**Basic Assistance:** This can include complaints and support needs related to lost/exceeded PIN, lost card, mistreatment by bank staff, card malfunction, concerns related to exclusion from cash/food, persons in need of Core Relief Items/Non-Food Items (referrals are not accepted for multi-purpose cash)

**المساعدة الأساسية/المساعدة الغذائية:** يمكن أن تشمل ارقام التعريف الشخصي المفقودة، البطاقة المفقودة، سوء المعاملة من قبل موظفي البنك، عطل في البطاقة، المخاوف المتعلقة بالاستبعاد من المساعدة النقدية/الغذائية، في حاجة إلى مواد الإغاثة الأساسية / المواد غير الغذائية. (لا يتم قبول الإحالات للمساعدات النقدية المتعددة الأغراض)

**Food Security and Agriculture:** This can include lost PIN, lost card, mistreatment by bank staff, card malfunctioning, concerns related to exclusion from cash/food; it can also include most vulnerable individuals or households (a) willing to enrol in short term vocational trainings (b) willing to engage in agricultural seasonal/casual labour. For non-Lebanese terms and conditions apply as per the Lebanese laws, rules & regulations. Syrians are limited to work in the sectors specified by MOL decisions.

**الأمن الغذائي والزراعة:** يمكن أن يشمل ذلك فقدان رقم التعريف الشخصي، أو البطاقة المفقودة، أو سوء المعاملة من قبل موظفي البنك، أو خلل في البطاقة، الحالات المتعلقة بالاستبعاد من النقد / الغذاء؛ يمكن أن يشمل أيضاً الأفراد أو الأسر الأكثر ضعفاً (أ) الراغبين في الالتحاق بالتدريب المهني القصير المدى (ب) الراغبين في العمل الزراعي الموسمي/ العرضي. تطبق الشروط والأحكام على غير اللبنانيين حسب القوانين والقواعد اللبنانية. يقتصر العمل في السوريين القطاعات التي تحددها قرارات وزارة العمل.

**Health:** This can include individuals in need of specialized mental health services and individuals in need of hospital care (not otherwise covered by UNHCR/NEXTCARE).

**الصحة:** يمكن أن تشمل الأفراد الذين يحتاجون إلى خدمات الصحة العقلية المتخصصة والأفراد الذين يحتاجون إلى الرعاية في المستشفيات (الذين لا تشملهم تغطية من قبل المفوضية السامية للأمم المتحدة لشؤون اللاجئين/ NEXTCARE).

**Education:** It can include a child not attending school or at risk of dropping out from school, or community learning spaces, rejected enrolment of child by public school. It also includes children and youth who have special needs in need for learning support or referral to specialized services.

**التعليم:** يمكن أن يشمل الطفل الذي لا يذهب إلى المدرسة أو المعرض لخطر ترك المدرسة، أو مساحات التعلم المجتمعية، والإبلاغ عن العقاب البدني / الإساءة البدنية أو اللفظية من قبل المعلمين أو أقرانهم في المدارس العامة، ورفض تسجيل الأطفال في المدارس الحكومية. ويشمل أيضا الأطفال والشباب ذوي الاحتياجات الخاصة أو المحتاجين إلى دعم تعليمي أو إحالة إلى الخدمات المتخصصة.

- Shelter:** It can include new arrivals/homeless/eviction cases with no shelter, bad shelter conditions in informal settlements, residential and non-residential structures, heavy flooding/inundation in informal settlements and destroyed shelters due to fire or natural hazards.

**المأوى:** يمكن أن يشمل الوافدين الجدد / المشردين / حالات الإخلاء من دون مأوى، وظروف المأوى السيئة في المستوطنات غير الرسمية، والمباني السكنية وغير السكنية، والفيضانات / الغمر الشديد في المستوطنات غير الرسمية، والملاجئ المدمرة بسبب الحريق أو الأخطار الطبيعية.

- Livelihoods:** it can include vulnerable Lebanese in needs of financial services (financial literacy, savings and loans) or vulnerable individuals or households (a) in need of financial literacy and savings (b) willing to enroll in short term vocational trainings (c) willing to engage in Labor Intensive Projects; for Non-Lebanese terms and conditions apply as per the Lebanese laws, rules & regulations. Syrians are limited to work in the sectors specified by MOL decisions. Strong focus is on Women and Youth.

**سبل العيش:** يمكن أن تشمل اللبنانيين المحتاجين إلى خدمات مالية (الالمام بالأمور المالية، الإدخار والقروض) أو الأفراد أو الأسر الضعيفة (أ) المحتاجين إلى الالمام بالأمور المالية والإدخار (ب) المستعدين للتسجيل في دورات تدريبية مهنية قصيرة المدى، (ج) المستعدين للانخراط في مشاريع العمل المكثفة؛ تطبق الشروط والأحكام بالنسبة لغير اللبنانيين بحسب القوانين، القواعد، والأنظمة اللبنانية. على سبيل المثال يقتصر عمل السوريين على القطاعات التي تحددها قرارات وزارة العمل. يجب أن يكون التركيز على النساء والشباب.

- Water, sanitation and hygiene:** Only in informal settlements it can include rehabilitation or the construction of latrines, construction of grey water system, de-sludging services, water trucking requests and the distribution of hygiene kit, drainage kit, garbage bins, and water tank. In informal settlements and urban areas, it can include requests for hygiene promotion sessions.

**المياه والصرف الصحي والنظافة الصحية:** فقط في المخيمات ويمكن أن تشمل إعادة التأهيل أو بناء المراحيض ، بناء نظام المياه المبتدلة ، خدمات إزالة الرواسب ، طلبات نقل المياه بالشاحنات وتوزيع أدوات النظافة ، مجموعة الصرف الصحي ، صناديق القمامة ، وخزان المياه . أما في المخيمات والأحياء ، يمكن أن تتضمن طلبات لجلسات تعزيز النظافة.

#### Case Narrative

##### وصف الحالة

*Describe the minimum information required by the receiving agency to be able to respond to the referral. This can include problem description, whether s/he receives other assistance, number in the household, etc. For referrals to SGBV, CP and Protection case management, do not provide details of the case or incident.*

صف الحد الأدنى من المعلومات التي تطلبها المنظمة المتلقية لتكون قادرة على الرد على الإحالة. يمكن أن يشمل ذلك وصف المشكلة ، سواء كان يتلقى مساعدة أخرى، عدد أفراد الأسرة. لا تقدم تفاصيل الحالة أو الحادث عن حالات العنف القائم على النوع الاجتماعي، حماية الطفل، ادارة الحالات.

**Consent to Release Information****الموافقة على مشاركة المعلومات**

Read the disclosure with the individual. Inform the individual how his/her data will be used by the service provider and answer any questions s/he might have before s/he signs the disclosure. For children under 18 years where the caregiver may be implicated in the abuse informed assent should be sought instead.

Explain to the individual that s/he has the right to request that his/her information not be documented and can request retrieval of the information at any time. S/he has the right to refuse to answer any questions they prefer not to and the right to ask questions or for explanations about the referral process at any time.

اقرأ الكشف مع الفرد. أخبر الفرد بكيفية استخدام بياناته من قبل مقدم الخدمة وأجب عن أي أسئلة قد تكون لديه قبل أن يوقع الكشف. بالنسبة للأطفال دون سن 18 عامًا حيث قد يكون مقدم الرعاية متورطًا في الإستهلال يجب أن يتم تطبيق الموافقة المستنيرة بدلاً من ذلك.

وضح للفرد أنه يحق له طلب عدم توثيق معلوماته ويمكنه طلب استرداد المعلومات في أي وقت. وله الحق في رفض الإجابة على أي أسئلة يفضلون عدم الإجابة عليها، كما يحق له طرح أسئلة أو توضيحات حول عملية الإحالة في أي وقت.

I \_\_\_\_\_ (person of concern name), acknowledge that the service provider, \_\_\_\_\_ (service provider name) has clearly explained the procedure of the referral to me and has listed the exact information that is to be disclosed. I understand that my information will be treated with confidentiality and respect and will only be shared as needed to provide assistance and may be used for purposes of humanitarian analysis. By signing this form, I authorize this exchange of information to the specified service provider/s for the specific purpose of providing assistance to my family and/or myself.

أنا \_\_\_\_\_ (اسم الشخص المعني)، أقر بأن مقدم الخدمة، \_\_\_\_\_ (اسم مقدم الخدمة) قد شرح بوضوح الإجراء الخاص بالإحالة إلى وأدرج المعلومات الدقيقة التي سيتم الكشف عنها. أفهم أنه سيتم التعامل مع معلوماتي بسرية واحترام ولن يتم مشاركتها إلا عند الحاجة لتقديم المساعدة ويمكن استخدامها لأغراض التحليل. من خلال التوقيع على هذا النموذج، أصرح بتبادل المعلومات هذه لمقدم / مقدمي الخدمة المحددين لغرض محدد هو تقديم المساعدة لعائلتي و / أو ل نفسي.

Signature of Client:

توقيع العميل

Date:

التاريخ

**Checklist of Referral****تفاصيل الإحالة**

**Check that you have considered all aspects of conducting a safe referral prior to sending the referral.**

**تحقق من أنك قد درست جميع جوانب إجراء إحالة آمنة قبل إرسال الإحالة.**

Individual is informed of available service options and consents to go ahead with the referral?  Yes  No (If no, explain) \_\_\_\_\_

هل تم إبلاغ الشخص بالإحالة والخدمات المتوفرة؟  نعم  كلا (إذا كان الجواب كلا، الرجاء الشرح) \_\_\_\_\_

Individual has signed consent to release information.  Yes  No (If no, explain) Hotline Referral

هل وقع(ت) الشخص الموافقة على مشاركة المعلومات؟  نعم  كلا (إذا كان الجواب كلا، الرجاء الشرح) \_\_\_\_\_

Any contact preferences?  Yes  No (If yes, explain) \_\_\_\_\_

أي تفضيلات اتصال؟  نعم  كلا (إذا كان الجواب نعم، الرجاء الشرح) \_\_\_\_\_

Any risks or immediate safety concerns observed/expressed?  Yes  No (If yes, explain)

ملاحظة أو اخبار عن أي مخاطر أو مخاوف السلامة الفورية

أي تفضيلات اتصال؟  نعم  كلا (إذا كان الجواب نعم، الرجاء الشرح) \_\_\_\_\_

**ANNEX E****LEBANON PSEA NETWORK MEMBER  
PSEA FOCAL POINTS (DECEMBER 2020)**

The list of PSEA Focal Points will be updated regularly by the PSEA Coordinator or Network co-chairs and shared with the PSEA Network and other stakeholders. It is the responsibility of each PSEA Network member to inform the PSEA Coordinator or Co-chairs of changes to PSEA Focal Points and to substantively handover their responsibilities. Please check with the PSEA Coordinator or PSEA Network co-chairs for the most up-to-date list of focal points.

	UN Entity	Name	Function	Email	Telephone
1	FAO	Etienne Careme Elie Choueiri (Alternante)	Resilience and Liaison Officer Program Assistant	Etienne.Careme@fao.org Elie.Choueiri@fao.org	03-156894 03-256707
2	ESCWA	Reine Sarkis Carla Moussa (Alternate)	Human Resources Officer ESCWA Center for Women	sarkis1@un.org moussa1@un.org	+961 1 978 107 009 611 978 738
3	ILO	Frida Khan Alternate – pending	Senior Gender Equality Specialist	khanf@ilo.org	+961 81995168
4	IOM	Maya Madani Marielle Tra (Alternate)	Senior Human Resources Assistant Operations Officer	mmadani@iom.int mtra@iom.int	71 255 562 +96181694569
5	OCHA	Helena Mazarro Ai Odoriba (Alternate)	Deputy Head of Office Associate Humanitarian Affairs Officer	mazarro@un.org ai.odoriba@un.org	+961 719 10923 +961 709 85 272
6	OHCHR	Ansam Abayechi Celine Rabbat (Alternate)	Regional Gender Advisor Lebanon Gender Advisor	aalabayechi@ohchr.org crabbat@ohchr.org	+961 81308161
7	RCO	Kristine Najjar Natalie Sarafian (Alternate)	Development Coordination Officer Team Lead RCO	kristine.najjar@un.org sarafian@un.org	+961 (81) 317516 76318885
8	UNDP	Tonina Frangieh Alternate – pending	Coordination Officer	tonina.frangeih@undp.org	+961 3 102493
9	UNESCO	Dr Sugita Seiko Rana Abdul Latif (Alternate)	Programme Specialist National Education Program officer	s.sugita@unesco.org r.abdul-latif@unesco.org	961 366 7526
10	UNFPA	Erica Talentino Manar Sarsam (Alternate)	GBV Specialist and Humanitarian Coord Admin/Finance Associate	talentino@unfpa.org sarsam@unfpa.org	+961 76482273 81218008
11	UN-Habitat	Lady Manoukian Habchy Maryam Nazzal (Alternate)	Project Support Off. Social Development Coordinator	lady.habchy@unhabitat.org maryam.nazzal@unhabitat.org	01/850 013-14 Ext: 193 70 899 609
12	UNHCR	Martin De Oliveira Santos Anne Triboulet (Alternate)	Associate Protection Officer Head of Protection Unit	deolivei@unhcr.org triboule@unhcr.org	+961 70 336 121
13	UNICEF	Farah Hammoud Aleksandra Vidojevic (Altern)	Child Protection Officer GBV specialist Child Protection Specialist	fhammoud@unicef.org avidojevic@unicef.org	81 623 555 81-739 777
14	UNIDO	Jacqueline Moukarel	Personal Assistant to UNIDO Representative & Office Operations Manager	J.MOUKARZEL@unido.org	03-061140
15	UNIFIL	Chithra Subramoni Carla Nehme (Alternate) Adama Ndao	UNIFIL, CDO UNIFIL, CDO UNIFIL, Chief, RCDS	Subramoni@un.org Nehme1@un.org ndaoa@un.org	08 16 70 417 3732647 78986648
16	UNODC	Ayla El Ghaziri Mira Abou Chakra (Alternate)	Programme Assistant Finance Assistant for MEA	ayla.elghaziri@un.org mira.abouchakra@un.org	01962500 ext.223 70 794499
17	UNOPS	Angela Santucci Hasan Wardani (Alternate)	Partnerships Specialist Senior Programme Management Officer	AngelaS@unops.org hasanw@unops.org	+961 70640250 +961 760 23 86
18	UNRWA	Alisa Mayer Maria Mouzawak (Alternate)	Gender Based Violence Coordinator Legal Officer	a.mayer@UNRWA.ORG m.mouzawak@unrwa.org	961 76 683 643 +961 708 30499
19	UNSCOL	Fatos Abrashi (Alternate pending)	Chief, Human Resources Officer	abrashif@un.org	+961 70 863 843
20	WFP	Kamar Alameddine Leila Meliough (Alternate)	Protection Officer Head of Basic Assistance & Programme	kamar.alameddine@wfp.org Leila.meliough@wfp.org	+961 7085 8093 +961 7191 3453
21	UN Women	Claire Wilson Rachel Weeks (Alternate)	Field Coordinator Head of Office	Claire.wilson@unwomen.org rachel.weeks@unwomen.org	081 114 832 081 071 627
22	WHO	Edwina Zoghbi (Alternate pending)	National Professional Officer	zoghbie@who.int	+961 3 815727

## NGO PSEA Focal Points

	Organisation	Name	Function	Email	Telephone
23		Ghady Addoum Zeina Mhaidly (Alternate)	PSEA Officer Senior Project Coordinator	ghady_addoum@hotmail.com zeina.mhaidly@abaadmena.org	+961 3 267 028
24	INTERSOS	Rafa Ezzedin Patricia Al Arou (Alternate)	UNHCR Project Manager Country CP/GBV Coordinato	psea.lebanon@intersos.org Lebanon.psea@intersos.org	81315213
25	Tabitha -Dorcas Lebanon	Philippe Dureau (Alternate pending)	Country Director	p.dureau@lebanon.dorcas.org	70321501
26	Local NGO Forum (LHDF)	Philippe Dureau Amani Shakaroun	Liaison - stratégie LHIF PSEA Officer	p.dureau@lebanon.dorcas.org amani_live@hotmail.com	70321501 +961 71120139
27	CARE Int Lebanon	Georgette Alkarnawayta Bujar Hoxha (Alternate)	PSEA Specialist Country Director	georgette@careliban.org bujarhoxha@careliban.org	+961 76 508991 +961 79 160 295
28	Concern Worldwide	Anita Shah Olivia Leroux (Alternate)	Country Director / Liaison LHIF Programme Director	lebanon.cd@concern.net Olivia.leroux@concern.net	70900343
29	Terre des Hommes / L	Franck Joly Alia Aturki (Alternate)	Country Representative/Liaison LHIF PSEA Focal point	franck.joly@tdh.ch Alia.alturki@tdh.ch	71 503 496 3981211
30	KAFA	Julie El Khoury Mira Faddoul (Alternate) Maria Semaan (Alternate)	Program Coordinator Head of Child Protection Unit Program Officer at CP Unit	julie.elkhoury@kafa.org.lb mira.faddoul@kafa.org.lb maria.semaan@kafa.org.lb	76 511189 70-183284 03-287088
31	Makzoumi Foundation	Leila Hamdan (Alternate pending)	SGBV case manager	l.hamdan@makhzoumi.org	3064523
32	Norwegian People's Aid	Elvira Giraldez Darine Abou Hamdan (Alternate)	Regional Project Manager – MENA Regional Programme Coordinator	ElviraG@npaid.org darabo630@npaid.org	+961 81 620 262 +961 70 040 662
33	Humanity and Inclusion	Caroline Du Conseille (Alternate pending)	Head of Mission	c.duconseille@hi.org	03 103 737
34	URDA	Mariam Barraj Raneem Otabachi	Protection Programme Coordinator Protection Project Coordinator	mariam.barraj@urda.org.lb protection@urda.org.lb	+961 76 82 77 56 +961 70 00 95 48
35	Medair	Isabelle Salameh Sami Osmen (Alternate)	Health Manager HR Manager	isabelle.salameh@medair.org hro-zah@medair.org	+961 70 120 948 +961 70 186 842
36	Save the Children Int. Lebanon	Muriel Saad Racha Chedid (Alternate)	HR and Safeguarding Coordinator Finance Director	Muriel.Saad@savethechildren.org Racha.Chedid@savethechildren.org	03 742 908 70 165 542
37	Oxfam	Betty Gdanian Sally Abi Khalil (Alternate)	Senior HR Officer – Safeguarding FP Country Director	bgdanian@oxfam.org.uk SAbiKhalil@oxfam.org.uk	+961 79 111 018 +961 3 798 422
38	Himaya	Sandra Manachi Serge Saad (Alternate)	Capacity Building Manager Operational Director	sandra.manachi@himaya.org serge.saad@himaya.org	+961 71702316
39	SAMS	Eli Lebbos Ola Mouheildine (Alternate)	M.E.A.L. Coordinator Project Coordinator	elebbos@sams-usa.net omouheildine@sams-usa.net	+961 03 722 149 +961 76 962 317
40	Trocaire	Alison Heron Amena Hareb (Alternate)	Head of Programmes Project Manager	Alison.heron@trocaire.org Amena.hareb@trocaire.org	96176901085
41	Caritas Lebanon	Lead pending Eliane Abi Sleiman (Alternat)	Safeguarding Officer Protection Coordinator	Eliane.abisleiman@caritas.org.lb	+961 81127018

## ANNEX F

## SEA INFORMATION SHARING PROTOCOL

## Sexual Exploitation and Abuse allegation

## Information Sharing Protocol between PSEA Network Members and the PSEA Coordinator / Co-Chairs

November/December 2020

## PURPOSE

This Information Sharing Protocol (ISP) is to set out the guiding principles and describe procedures for reporting incidents of cases of sexual exploitation and abuse (SEA) and sharing anonymized statistical data on reported cases on SEA, received by PSEA Network Members Lebanon and the PSEA Coordinator, on behalf of the Resident and Humanitarian Coordinator for Lebanon, or the PSEA Network Co-Chairs in the absence of a PSEA Coordinator. The ISP is intended to facilitate good practices on information sharing, transparency and responsible handling of data, transparency between participating actors.

PSEA Network members recognize that sharing and receiving non-identifiable SEA data will contribute towards improved inter-agency coordination, identifying and targeting gaps, prioritization of actions, and improved SEA prevention and response efforts, as well as greater monitoring and accountability. It could also support advocacy efforts. **All signatories will make every effort to protect information to ensure that no harm comes to any survivor, service provider or the community from information sharing.**

The UN is required to report allegations of SEA to the Secretary-General. UN implementing partners also have an obligation to report allegations of SEA to the UN partner entity. For other organizations not affiliated with the UN, including local CSOs and faith-based organisations, sharing information on allegations of SEA according to this Information Sharing Protocol (ISP) is strongly encouraged to strengthen collective accountability, support for survivors and improve the protective environment. ALL humanitarian actors have the responsibility to report SEA allegations, including those that do not pertain to staff or implementing partners. This ISP is intended to increase confidence among all organizations in ensuring that information will not be misused or shared beyond the agreements specified in this document, in keeping with the best interest of the survivors.

This protocol is based on the standard gender-based violence (GBV) information-sharing protocol for the GBV

Information Management System and data protection guidance, as SEA is a form of GBV and thus SEA data carries with it similar sensitivities and protection obligations. However, noting that there is a mandatory requirement for aid workers to report on all SEA allegations, and that there are therefore limits to confidentiality.

## GROUND RULES

- Information submitted by PSEA Network members to the PSEA Coordinator (or co-chairs in the absence of the PSEA Coordinator) will be submitted in the agreed-upon format and **will not contain any identifying information of survivors, complainants, witnesses or alleged perpetrator.** Non-identifiable SEA data is context specific but excludes data points that could result in a survivor (or, in some cases, those organizations providing services to them) becoming known. The data points to be shared must consider all possible outcomes that could lead to a survivor being identified and must consider both the number of cases being reported and the context, with SEA typically being severely under-reported in all contexts.
- PSEA Network members agree to share **confidential notifications to the RC/HC through the PSEA Coordinator when an allegation has been received.** After the investigation has been completed, the agencies' PSEA focal points shall inform the PSEA Coordinator – who has an obligation to inform the RC/HC of the status of the investigation and action taken as soon as the information is received, which shall be done in accordance with the protocol of each organization for sharing such information. *PSEA Network members and other humanitarian actors also have the option to directly report to the RC/HC.* 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.** (See below section on reporting for details regarding information to be reported).
- All SEA allegations, whether they pertain to UN staff, UN implementing partners or other actors, including CBOs, faith-based entities, government, etc. should be reported to the PSEA Coordinator or directly to the RC/HC, and in line with the Inter-Agency PSEA SOPs.

1. The ISP does not cover information pertaining to allegations of sexual harassment in the workplace.

2. United Nations Protocol on Allegations of Sexual Exploitation and Abuse Involving Implementing Partners, available at: <https://www.un.org/preventing-sexual-exploitation-and-abuse/content/policies>. While this protocol is not binding, reporting obligations should be specified in the partnership contracts between UN entities and partners. Whether the reporting obligation covered by the contract applies only to allegations against UN-funded program staff or all staff of the organization, regardless of funding source, is dependent on each contract. If the contract is unclear, it is up to the discretion of each agency to take a broad or narrow approach; however, a broad approach enables increased accountability system-wide.

3. The RC/HC does or the PSEA Coordinator is involved in the investigation of SEA allegations; this remains the responsibility of each UN entity or NGO.

- In addition, using the reporting template (see below) **participating entities will on a quarterly basis, share consolidated information on SEA allegations/incidents with the PSEA Coordinator**, who will compile said information into an anonymous quarterly and annual PSEA report, which is **shared with the RC/HC and HCT/UNCT**. This report will be shared back to the PSEA Network organizations signatory to this protocol for further shared analysis and to inform the PSEA Network work plan and priorities on an ongoing basis.
- All PSEA Network members **will make every effort protect information to ensure that no harm comes to any survivor, service provider or the community from information sharing**. Entities agree to receive information in good faith and in the spirit of cooperation, in line with this protocol.
- The PSEA Network recognizes that organizations may have a duty to report allegations of SEA to their donors. The requirements of mandatory reporting will depend on the individual agreements with donors. Each PSEA Network member reserves the right to share its own data externally, for example for internal and donor reporting requirements, and for accountability purposes. Even when using its own data externally, each PSEA Network member is expected to do this in a responsible manner, using non-identifiable data/information only, that **maintains the safety and security of SEA survivors/complainants, service providers and communities, as well as confidentiality regarding the alleged perpetrator**. Any requests from donors for SEA information should be directed to the relevant organizations' PSEA focal point.
- HCT/UNCT or PSEA Network members are NOT permitted to share SEA data reported to the HCT/UNCT with external stakeholders, without prior clearance by the RC/HC.
- New PSEA Network members will be added to the ISP once they meet the following criteria:
  1. They have reviewed the ISP and discussed the process for information sharing within their organization;
  2. They have organizational buy-in for data sharing;
  3. The organisation has in place data protection measures or commits to implementing such measures; and
  4. The Head of Organisation in Lebanon has acknowledged the protocol and disseminated it amongst relevant staff members.
- For security purposes and to ensure survivor confidentiality, **no survivor-specific information that can lead to identification of the survivor will**

**be shared at any stage**, e.g., name, initials, address, phone number, UNHCR registration number, etc. All information shared will be anonymous data and information. Identifiable data regarding the alleged perpetrator should also not be shared externally. Training and guidance on SEA data sensitivity and data safety measures will be provided to PSEA Focal Points and other partners.

- Following endorsement of the ISP by the HCT and UNCT, the PSEA Network members, the PSEA Coordinator and co-chairs of the PSEA Network have a **responsibility to train PSEA Focal Points, including from implementing partners**, and/or be familiar with the standards and procedures outlined in this protocol.

## DATA SECURITY

The PSEA Coordinator/Co-Chairs and the PSEA Network members will ensure that all data is safe and secure and will implement appropriate procedures to maintain confidentiality of the data. Organizations will submit an Excel document and will employ password protection. The **password for these submitted files** will be agreed upon by PSEA Network members and shared with the PSEA Coordinator/co-chairs.

### According to this protocol data will handled as follows:

- Received: Email to PSEA Coordinator or Network co-chairs;<sup>4</sup>
- Stored/deleted: Stored in PSEA Coordinator or Network co-chair's computer in non-shared drive; deleted annually;
- Protected in the computer: Password protected;
- Used by whom (who has access to the data and the computer): PSEA Coordinator or Network co-chairs;
- The title of any email communications should not include identifying information;
- The email/electronic communications should be in protected format (i.e. not possible to forward).

Entities must follow its internal 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

4. See the Focal Point document.

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.

In case the security situation deteriorates in Lebanon, hampering the 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. The PSEA Network Technical Working Group will develop contingency plans for data security and information sharing should the security situation change.

## REPORTING

**Frequency 1:** PSEA Network members will notify the PSEA Network Coordinator (or, if the PSEA Network coordinator is not in place, the PSEA Network Co-Chairs) whenever an allegation of SEA is received (see above section on 'ground rules'). **Information to be shared by PSEA Focal Point in agency/organization that received the allegation and in accordance with the Inter-Agency PSEA SOPs for Lebanon as follows:**

1. The date of the incident(s);
2. The nature of the incident (sexual exploitation or sexual abuse);
3. Whether the victim/survivor is an adult or child;
4. Gender of the survivor;
5. Confirmation that the survivor has been referred for required/appropriate services and support, with her/his informed consent; and that safety measures have been implemented to ensure the protection of survivors/complainants;
6. The name of the organisation/entity employing the alleged perpetrator;
7. intermediary actions taken (e.g. administrative leave/suspension of the alleged perpetrator)
8. Confirmation and date that the incident has been reported to relevant investigatory mechanism, in accordance with internal protocols.
9. Notification of whether the incident has been reported to the police.

In the case of inter-agency reporting of cases, information related to points number 7 and number 8, should be reported by the organization/agency conducting the investigation (i.e. the organization of the alleged perpetrator).

### **Follow up communications regarding incidents reported to be shared by the organization conducting the investigation (organisation of the alleged perpetrator):**

10. The outcome of internal investigations and disciplinary measures applied;
11. Information regarding SEA risk mitigation measures applied for example refresher PSEA trainings for partners and staff, awareness messages on for affected communities on their rights and how/where to safely report, addressing gender imbalances in frontline teams, etc.

**Frequency 2:** PSEA Network members will also submit an excel table of summary information (see example table below) to the PSEA Network Coordinator or the PSEA Network co-chairs, who will consolidate all submitted data into an aggregate table and report on a quarterly and annual basis.

- The table will be presented in PowerPoint format by the PSEA Network Coordinator or the PSEA Network co-chairs at a PSEA Network meeting with PSEA Network members on a quarterly basis. The purpose is to update members on SEA trends and response and to ensure that accountability actions are taken. During or after the meeting, Network members may raise concerns about any of the data and/or request to amend data.
- Following discussions with PSEA Network members, the report in Excel format will be shared with the UN Resident/Humanitarian Coordinator, in his/her capacity as the senior most UN official with accountability in the implementation of the Secretary General's Bulletin on Sexual Exploitation and Abuse. The reports will be presented in PowerPoint format by the PSEA Network Coordinator or the PSEA Network co-chairs to the HCT and UNCT for accountability purposes (see pre-approved information-sharing) and included in the RC/HC's annual report to the Secretary-General.
- **UN Annual Certification:** All UN agencies are also required to 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 required to report SEA allegations involving their own personnel and implementing partners 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).

## MONITORING AND ACCOUNTABILITY

The secondary purposes of aggregating information received by PSEA Network members is to ensure that each allegation of SEA has been promptly followed up and investigated by the relevant organization. This is to ensure that no gaps in follow-up occur and that organizations take appropriate and necessary accountability actions.

### PSEA FOCAL POINTS

The individuals responsible for the submission of data are listed in the PSEA Focal Point document (**Annex E Focal Points Document**). Each organization or agency that is part of the PSEA Network should have a primary and second PSEA Focal Point to fulfill the roles and responsibilities and an appointed alternate, in case the primary PSEA Focal Point is not available. **In the case of staff turnover, each agency is responsible for designating a new focal point, doing a complete handover of SEA reporting responsibilities, and communicating this change to the PSEA Network Coordinator or the PSEA Network co-chairs, who will be responsible for updating the PSEA Focal Point document.** In case no update is provided about the new PSEA Focal Point, the PSEA Network Coordinator or the PSEA Network co-chairs will contact the senior management of the concerned organization to obtain the new focal point details.

## SHARING OF SEA INFORMATION

### Pre-Approved Information Sharing

The agencies/entities below have been approved by all PSEA Network members to access the agreed-upon consolidated data reports for the specific purposes mentioned.

Sharing of SEA statics and trends should be done with the following caveat:

*The data shared is only from reported cases and is in no way representative of the total incidence or prevalence of SEA in Lebanon. Like all forms of SGV, SEA is typically severely under-reported, including due to fear, stigma and shame. This data should not be used for direct follow-up with survivors or organizations for additional case follow-up. The following information should not be shared outside your organization/agency. Failure to comply with the above will result in the suspension of sharing SEA statistics in the future.*

**Media and other external actors:** All information requests on SEA from the media and external actors will be carefully considered and any requests for consolidated information on SEA, have to be made in writing to the PSEA Network Coordinator or Network co-chairs in the absence of the Coordinator. Approval of such information sharing may only be given by the RC/HC. Going forward, the PSEA Network will also consider on how to share consolidated information with donors in Lebanon and with agreement from the HCT and UNCT, an approach and format will be agreed upon.

### TIMELINE & REVISIONS

Once agreed, this protocol will take effect from the agreed upon date for information sharing to begin and will be on trial basis for **3** months from the date the ISP has been endorsed (first reporting period). After this time, the PSEA Network members will review the effectiveness of, use of, and adherence to the protocol. In the absence of a new agreement, this protocol will automatically be renewed for **6** months, until a revised version can be agreed upon.

To ensure regular review, an on-going agenda point on the ISP will be included at the end of the quarterly PSEA Network meetings to inform participating actors of issues that require a follow-up discussion or changes.

### BREACHES

In cases of breach by any of those participating in this information sharing protocol, a meeting will be convened of the PSEA Network Core Technical Working Group within one week to discuss the matter and to determine appropriate action to be taken. If a resolution cannot be reached, then the following process should be undertaken:

Who	Purpose	Format
HCT	Accountability, advocacy	Verbal and written presentation of summary information
UNCT	Accountability, advocacy	Verbal and written presentation of summary information
RC/HC	Accountability, advocacy	Verbal briefing and Excel table; information for annual reporting to the SG; notification of SEA allegations
PSEA Network Members participating in the ISP	Accountability, improved PSEA programming	Verbal and written presentation of summary information

- A meeting will be convened with the Senior Management from the PSEA Network Core Technical Working Group<sup>5</sup> to discuss the matter and to determine appropriate action to be taken within one week.
- If unresolved, the matter should be referred to the RC/HC within two weeks of the breach or suspected breach.

This resolution process should not impact regular information sharing, if resolved. PSEA Network members reserve the right to stop sharing data if the ISP is breached and will inform the PSEA Coordinator/Co-chairs in writing with the reasons for stopping. While the matter is being resolved, it is recommended that PSEA Network members continue to share data with for accountability purposes and to inform PSEA Network activities. The SEA consolidated information will not be shared externally until the breach/problem is resolved.

Summary Information for Reporting (sample content only)												
An Excel template will be shared with PSEA Network members for reporting.												
Date of Incident	Date of reporting	Alleged perpetrator: international / local staff	Does the incident pertain to UN staff, NGO/ IP/other	Gender of survivor	Adult / minor	Nationality of survivor	Type of allegation	Geographical area of incident	Action taken	Interim action/ assistance rendered	Date investigation concluded	Referred for criminal proceedings
		International		F	Adult	Lebanese	SE	North	Organisation to investigate	Health/PSSS	Xx/XX/2020	No
		Local		M	Child (under 18)	Syrian	SA	BML	UN to investigate	Protection/ Health, PSS, etc.	Ongoing	Yes
		Unknown		Unknow		Unknown	SE	Unknown	Insufficient Information To proceed			

Organisation	Date	Signature

5. In 2020, the PSEA Network Technical Working Group comprised of UNHCR, UNIFIL, Abaad, Care, UN Women, UNWRA, UNFPA and UNICEF.



**ANNEX G****SAMPLE IASC COMPLAINTS  
HANDLING POLICY**

*Based on IASC Taskforce on PSEA Model Complaints and Investigation Procedures 2004*

*This may guide organisations that do not already have in place internal complaints handling policies and procedures and should be adapted to organizational requirements.*

**Purpose and applicability**

1. This internal complaint handling policy specifies the steps to be taken when sexual exploitation and abuse is suspected and when that abuse is allegedly perpetrated by a (AGENCY NAME) staff member. The policy also provides some guidance for situations in which complaints are received by an (AGENCY NAME) but the perpetrator's organization is unknown.
2. Sexual harassment of staff members is not included in the scope of these procedures.<sup>6</sup>
3. For the purposes of this document, "staff member" shall be taken to include any person who either works for (AGENCY NAME), regardless of whether or not they are paid for their work.
4. This policy applies to all staff, including consultants, interns and volunteers working for (AGENCY NAME).

**Commitment to PSEA**

5. (Agency Name) staff are obliged to create and maintain an environment that prevents sexual exploitation and sexual abuse. Managers at all levels have a particular responsibility to support and develop systems that maintain this environment.
6. All (AGENCY NAME) staff must report any concerns, including both specific complaints and rumours, regarding possible sexual exploitation or abuse by a(n) (AGENCY NAME) staff member, or any other humanitarian or development aid worker. Failure to report information through the proper channel should result in disciplinary action. Complaints should be reported even when the perpetrator's organization unknown.

**Complaints handling procedures**

7. It is the responsibility of the staff member to report a concern/complaint via the following process:
  - a. The first point of contact should be the designated PSEA Focal Point.
  - b. If the staff member cannot trust this reporting channel, or if they genuinely believe that this reporting route is compromised, then the complaint

should be raised directly with another [AGENCY NAME] manager or focal point at the country, regional or headquarters level.

- c. In exceptional circumstances, the complaint could also be made to another organization's PSEA Focal Point or UN agency PSEA Focal Point if the staff member genuinely believes that raising the matter within [AGENCY NAME] would not be effective, or if s/he has already disclosed the matter to [AGENCY NAME] but no effective action has been taken.
- d. It is suggested that the complaint should be recorded or should be written using a standard complaint intake form (Annex A – Sexual Exploitation and Abuse intake form), which should be signed and dated. [AGENCY NAME] must ensure that the individual who makes a complaint is informed of the [AGENCY NAME]'s policy on confidentiality. [AGENCY NAME] may wish to obtain a written consent from the complainant for the information to be made available to others within the complaint management system.
- e. Once a complaint or report is made, the PSEA focal point who receives the information should immediately report it to [AGENCY NAME]'s designated focal point at headquarters and/or the most senior member of staff of the organization. Once the complaint is received, the Head of [AGENCY'S NAME], in consultation with the agency focal point will consider the appropriate steps to take, including the initiation of preliminary inquiry or an investigation as per the Investigation Procedures.
- f. Any investigation that is undertaken must be completed, regardless of whether the alleged perpetrator is still a(n) (AGENCY NAME) staff member. In the event that a complaint does not warrant a full investigation, the Head of Office or Mission may nonetheless be asked to take a number of steps to address concerns in other ways, (for example, addressing matters of poor practice via training, a change in working arrangements or a change in procedures).
- g. If the complaint involves staff of other UN agencies, NGO partners, military personnel or non-staff personnel, such agencies must be informed of the complaint via established inter-agency mechanisms.
- h. Where the complaint involves personnel of more than one agency, consideration must be given to conducting a joint investigation in the interests of

<sup>6</sup> Within the UN system, policies and procedures for handling cases of sexual harassment are set forth in ST/AI/379, entitled "Procedures for dealing with sexual harassment." NGOs should refer to existing relevant agency policy and procedures for dealing with harassment cases.

information and resource sharing, as well as limiting the number of interviews necessary. This would be coordinated through a joint strategy meeting, convened urgently to discuss the complaint and agree on a course of action.

- i. If the complaint involves allegations against persons who could be UN staff or partners, even when the precise affiliation of the person(s) is unknown, the matter should be referred to the PSEA Network, and consideration should be given to conducting an interagency investigation to ensure that 'rumours' are addressed expeditiously.
- j. The Head of Office of [AGENCY NAME] must inform the subject of the complaint against them. He or she must be given an opportunity to answer the allegations in writing and to produce evidence to the contrary.

### Protection of whistle-blowers

8. Staff members should be reassured that there will be no action taken against any member of staff who reports in good faith information indicating a violation of the [AGENCY NAME]'s Staff Rules and Regulations and applicable codes of conduct regarding sexual exploitation and abuse and which, following investigation, proves unfounded. However, if a staff member knowingly and willfully reports false or malicious information regarding another member of staff, such false reports will lead to disciplinary action.

### Record keeping

9. A detailed record of information gathered via the complaints protocol should be kept confidentially on file as it may be used in subsequent disciplinary or legal action. Every effort must be made to ensure the security of such files.
10. Complaint protocol and investigation procedures should include systematic monitoring and evaluation and be subject to audit and review for lessons learned.

### Needs of the Survivor<sup>7</sup>

11. Urgent medical assistance and counselling must be made available to anyone who was potentially harmed by any alleged sexual exploitation or sexual abuse. This will generally be through referral to the appropriate service provider. The physical and psychological wellbeing of any such survivor must be a primary concern throughout the reporting and investigation process.
12. It is particularly important that, where the complainant is a beneficiary, the staff member

receiving the complaint considers whether the beneficiary has ongoing needs requiring protection or assistance. There may be immediate safety needs if the beneficiary is returning to an unsafe situation, or immediate health and psychological needs, particularly if there was a risk of transmission of disease. As [AGENCY NAME] is responsible for the action of its staff, every effort must be made to ensure that any survivor of sexual exploitation or abuse is provided with the necessary means for protection and rehabilitation. This will generally involve referral to other organisations able to address these needs.

13. Staff members working for or on behalf of [AGENCY NAME] will provide complainants of sexual or gender-based violence with full information and advice on existing redress and compensation mechanisms and/or procedures. Such information shall include at the minimum the contact or addresses where claims may be filed and any network helping complainants in the filing of claims or which would otherwise support them.

### Investigation Procedures<sup>8</sup>

14. The investigation of complaints should be conducted with due regard to a number of key principles including: confidentiality, safety, impartiality, objectivity, thoroughness, timeliness and accuracy as well as safeguarding the due process rights of the alleged perpetrator. (AGENCY NAME), in cooperation with relevant agencies or local institutions, will do all in its power to protect witnesses and survivors and to promote their safety and welfare. All individuals concerned, including the subject of the complaint, have the right to be treated with respect and dignity and to be kept informed of the progress of the investigation.
15. [AGENCY NAME] must designate a senior member of staff or focal point to assume responsibility for the oversight and monitoring of the investigation. The designated senior member of staff or focal point will be responsible for ensuring that an investigation is undertaken according to the principles of confidentiality, safety, impartiality, objectivity, thoroughness, timeliness and accuracy, in line with (AGENCY NAME'S) established sexual exploitation and abuse investigation procedures, and local inter-agency agreement or procedures. Consequently, the senior member of staff or focal point should be trained in investigation skills and in dealing with sexual exploitation and abuse complaints.
16. In cases where multiple agencies are implicated in the complaint, all such agencies must be involved in the investigation and consideration given to

7. Importantly, see also the UN Protocol on Provision of Assistance to Victims of Sexual Exploitation and Abuse (December 2019): [https://www.un.org/en/pdfs/UN%20Victim%20Assistance%20Protocol\\_English\\_Final.pdf](https://www.un.org/en/pdfs/UN%20Victim%20Assistance%20Protocol_English_Final.pdf)

Guidance Note on provision of assistance to survivors/victims of SEA in the Lebanon context – to be developed

8. See also CHS Alliance Guidelines for Investigations (2015): <https://www.chsalliance.org/get-support/resource/guidelines-for-investigations/>

conducting a joint investigation.

17. Where senior members of staff have not yet been trained in investigation skills in dealing with sexual exploitation and abuse complaints, or where (AGENCY NAME'S) Head of Office or most senior staff member deems that (AGENCY NAME) lacks sufficient internal capacity to conduct an investigation, the PSEA Network pool of investigators may be used. In this case, a request should be made to the PSEA Network co-chairs.
18. Investigators are appointed by the Head of [AGENCY NAME] or senior management and are provided with Terms of Reference and delegated authority. [AGENCY NAME] will ensure that all investigators receive the necessary training to undertake interviews of women and children who have been sexually exploited and abused.
19. Investigators are responsible for developing a written plan of the investigation and conducting the investigation in accordance with established complaint procedures.
20. The general principle of confidentiality is such that the disclosure of the identity of complainants, witnesses, survivors, the subject of the complaint and any others involved in an investigation, is restricted and is permitted only on an authorised or "need to know" basis, and only in certain exceptional circumstances. A breach of confidentiality may lead to disciplinary action.
21. The [AGENCY NAME] owes a duty of care to the subject of the complaint, which includes conducting a fair and impartial investigation.
22. Interviews should be conducted in a safe and supportive environment and in accordance with the principles of good practice, which apply at every stage of the interview process.
23. Witnesses should always be interviewed in the

language of his/her choice.

24. The survivor's race, age, gender, caste, culture, and ethnicity should be given due consideration by the interviewer. The interviewer should be aware of the role of unequal positions of power and cultural differences when conducting the interview. The interviewer should also take into consideration factors affecting responses such as fear of reprisal, vulnerability, anxiety, intimidation, or contravention of cultural norms.
25. If, after proper investigation, there is evidence to support allegations of sexual exploitation or sexual abuse which may contravene national laws, in consultation with the complainant and survivor and appropriate legal advisors, these cases may be referred to national authorities for criminal prosecution.

#### **Disciplinary Action**

26. The report of any investigation will be submitted to the Head of [AGENCY NAME], who will, in consultation with the focal point and Head of Office or Mission, decide upon an appropriate course of action. Should the investigation indicate that misconduct has not occurred, the case will be closed. Should the investigation indicate that misconduct has occurred, the matter will be referred to the head of administration with a recommendation for disciplinary action, including possible summarily dismissal, pursuant to [Agency Name] Staff Rules and Regulations.
27. [AGENCY NAME] must obtain references for a candidate for employment from previous employers to ensure that the candidate has not been subject to disciplinary action as a result of a breach of the former employer's code of conduct. Staff qualifications, prior employment records, as well as declarations with respect to criminal records or prosecutions should be thoroughly checked.

**ANNEX H****INFORMATION REGARDING REPORTING ON SEA AND UNIFIL/RCDS**

The Regional Conduct and Discipline Section (RCDS), based in UNIFIL, covers 12 missions including UNSCOL in Beirut.

RCDS receives and assesses allegations of SEA involving UNIFIL & UNSCOL personnel, upon determination by the Head of Mission/Force Commander/SRSG that an investigation is warranted, refer them to appropriate investigative authorities (OIOS in the case of civilians and to the troop contributing country if the allegation involves a military personnel). All allegations of SEA are recorded on the Misconduct Tracking System (MTS), a global, restricted-access database and confidential tracking system for all allegations of misconduct. MTS is managed by the Conduct and Discipline Service in the Department for Management Strategy, Policy and Compliance (DMSPC).

RCDS also records, tracks and follow-up on all cases of SEA relating to the mission/office covered, and further coordinate victim assistance for victims of SEA, in collaboration with other UN partners in the mission.

OIOS: In the case of an allegation of SEA involving UN personnel, RCDS is required to notify OIOS.

Member States: When allegations of SEA involve military or police personnel, UNIFIL and the Member State involved must together ensure that all allegations are investigated and that appropriate action is taken when allegations are substantiated.

Members of military contingents deployed in UNIFIL

remain under the exclusive jurisdiction of their national government. The responsibility for investigating an allegation of misconduct and taking subsequent disciplinary action rests with the troop-contributing country (TCC).

Some TCCs opt to investigate allegations of SEA in collaboration with OIOS. If a TCC does not opt to investigate allegations involving its personnel, the UN will conduct its own administrative investigation into the matter.

If UNIFIL receives information about an allegation of SEA, a member of a military contingent, in the vast majority of cases UNIFIL will refer the matter to the Permanent Mission of the country in question, requesting the Government to appoint a national investigation officer to investigate the allegation. Since July 2016, TCCs are required to include national investigation officers within their contingents to ensure that investigations start in a timely manner. The TCC involved must report back to the UN on the outcome of the investigation and on any actions taken.

Investigative entities are required to complete investigations into allegations of sexual exploitation and abuse within six months, subject to extenuating circumstances. TCCs have also been asked to complete their investigations within this time frame. In matters deemed particularly urgent, TCCs are requested to complete investigations within 90 days, which may also be done by UN investigative entities in similar circumstances.

**ANNEX I****PSEA FOCAL POINT TORS**

Lebanon In-Country PSEA Network Implementation of the Secretary-General's Bulletin on special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13)/ ToR/Roles and Responsibilities of PSEA Focal Points

Within his/her Organization, the PSEA Focal Point shall actively promote protection from sexual exploitation and abuse (SEA), with key responsibilities including:

**1. Prevention**

- Ensure that you are known as the PSEA Focal Point throughout the organization and your contacts are widely available.
- Support HR or staff directly to sign your Organization's Code of Conduct and SGB clearly prohibiting acts of SEA and obligating them to report such acts.
- Provide awareness-raising sessions on SEA for all staff and other personnel in the Organization on a regular basis, including for newcomers, contractors, and volunteers.
- Make appropriate recommendations to management on enhancing prevention strategies. This could include collecting and analyzing information on actual/potential risk factors, depending on the organisation's programmes and activities, for vulnerability to sexual exploitation and abuse and elaborating measures to address them.
- Engage with Management and HR to ensure that procedures, such as rigorous reference checks, to guard against hiring of persons who have a record of SEA offences are put in place and applied, if not already.
- Work with human resources personnel to include PSEA content in staff inductions, including all contractors, consultants, temporary staff, outreach volunteers and casual labourers.
- Support HR to ensure compliance with mandatory PSEA, Human Rights and gender training requirements at every level of the organisation.

**2. Response**

- Ensure the development of internal procedures for staff and other personnel to report incidents of sexual exploitation and abuse.
- Receive complaints, reports and questions about alleged acts of sexual exploitation and abuse committed by your organization's personnel

and personnel of sister/affiliated institutions, including the cases committed by personnel whose institutions are not known.

- Safely and confidentially refer allegations of sexual exploitation and abuse pertaining to another organisation in line with agreed inter-agency complaints referral pathways.
- Respecting the wishes of the survivor, ensure fast, safe and confidential referral to appropriate assistance and services, using established SGBV referral pathways and in line with the UN Protocol for Assistance to Victims of Sexual Exploitation and Abuse, and as identified in UN General Assembly Resolution 62/214.
- Take appropriate measures to ensure safety and confidentiality for all visitors to the Focal Point.
- Ensure that all materials pertaining to complaints are handled strictly in line with applicable grievance procedures.

**3. Engagement with and support to local populations**

- Facilitate awareness-raising in local communities on their rights and entitlements, including your organization's Codes of Conduct and principles regarding PSEA.
- Provide support in community consultations, monitoring of complaints and providing feedback to complainants and communities.

**4. Management and Coordination**

- Actively take part in and contribute to the Lebanon PSEA Network meetings and initiatives, including the implementation of the annual action plan.
- Assist the Head of Office/Resident Representative to fulfil his/her responsibilities on PSEA in accordance with the SGB.
- As required, support the inclusion of SGB standards in contractual arrangements with non-UN entities and individuals, per ST/SGB/2003/13 Sec. 6.1.
- As relevant, coordinate your Organization's adherence to relevant monitoring/ compliance mechanisms, including contribution to the annual report of the Secretary-General on Special Measures for Protection from Sexual Exploitation and Sexual Abuse.
- Safely and confidentially, in line with applicable data protection guidance, track all PSEA-related activities for the Organization and ensure that all

information on PSEA-related activities is shared with relevant persons in the Organization.

- Keep data on reported incidents for general reporting and further development of efforts to address SEA; stored in compliance with applicable data protection standards and policies.
- Keep management up to date on PSEA measures taken and plans for future action within your organisation and within the PSEA Network.

#### **5. Values and principles:**

- Proven integrity, objectivity and professional competence;
- Demonstrated sensitivity to cultural diversity and gender issues;
- Demonstrated experience of working directly with local communities;
- Proven communication skills.

## **ANNEX J**

# **PSEA NETWORK TORS**

– to be included once updated version is endorsed



