



**UNHCR**  
The UN Refugee Agency



# UNHCR POLICY ON THE PREVENTION OF, RISK MITIGATION, AND RESPONSE TO GENDER-BASED VIOLENCE

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*Cover: Refugee student delegation visits the Free University of Berlin on World Refugee Day. Berlin, Germany, 20 June 2019*

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# 1. PURPOSE

Gender-based violence<sup>1</sup> (GBV) is a serious human rights violation and major public health issue.<sup>2</sup> GBV is under-reported but known to happen in all contexts. Women and girls everywhere are disproportionately affected and are at heightened risk. Asylum-seekers, refugees, stateless persons, internally displaced persons, and returnees (collectively referred to as *persons of concern (PoC) to UNHCR*) are at-risk of GBV, irrespective of their age, gender or other diversity considerations.

This Policy consolidates the significant progress made by UNHCR and partners to prevent, mitigate, and respond to GBV. It further institutionalizes UNHCR's work on GBV, which is a collective accountability across the organization and requires the commitment and support of all members of the workforce.

The Policy has the following mutually reinforcing objectives:

- **Risk of GBV is reduced for all PoC**
- **All survivors<sup>3</sup> have adequate and timely access to quality services**

This Policy recognizes that women, girls, men or boys can be survivors of GBV. It highlights the imperative not only to respond to violence once it has occurred, but also, importantly, to prevent GBV by addressing its root causes and embedding gender equality in all aspects of our work. It also stresses the obligation to mitigate risk and to 'Do No Harm.' UNHCR's ability to take concrete steps to achieve the broader goal of eradicating GBV relies on strong institutional and cross-functional leadership.

# 2. SCOPE

This Policy covers all UNHCR Operations<sup>4</sup> and all PoC. It applies to all stages of the programme cycle, throughout the displacement continuum, in emergencies and protracted displacement settings, as well as in mixed flows and onward movements, and situations of statelessness. It also applies to activities relating to voluntary repatriation, resettlement and local integration, and other local solutions and complementary pathways for admission to third countries.

The Policy applies to the work of all members of UNHCR's workforce<sup>5</sup> at country, regional, and headquarters levels, across the full range of operational and advocacy presence in support of PoC to UNHCR. It covers offices that are operational as well as those whose primary focus is on advocacy.

Advocacy and effective partnership with governments and other actors are critical for the implementation of this Policy in all settings. UNHCR will advocate for and support the inclusion of PoC within national protection systems and programmes offering quality services in line with international standards. UNHCR will support governments to meet international standards and advocate with authorities where international standards are not met.

Compliance with this Policy is mandatory.



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Burundian returnees gather in Higiyo Village in northern Burundi. 11 April 2018

### 3. RATIONALE

GBV is a human rights violation that affects all aspects of a person's protection and well-being. It is a core component of UNHCR's protection mandate. GBV can be the impetus that compels people to flee; it also occurs during flight and refuge.<sup>6</sup> Regardless of the reason for displacement, the risk of GBV is heightened,<sup>7</sup> especially for women and girls. Programming to prevent, mitigate, and respond to GBV is lifesaving in humanitarian settings.<sup>8</sup>

This Policy is in line with existing global guidelines and commitments, including the *2030 Agenda for Sustainable Development*,<sup>9</sup> *Agenda for Humanity*,<sup>10</sup> the *Global Compact on Refugees*,<sup>11</sup> the *Call to Action on Protection from Gender-Based Violence in Emergencies*,<sup>12</sup> the *United Nations Action Network Against Sexual Violence in Conflict*,<sup>13</sup> the *GBV Accountability Framework*,<sup>14</sup> the *Inter-Agency Minimum Standards for GBV in Emergencies Programming*,<sup>15</sup> the *IASC Guidelines for Integrating GBV Interventions in Humanitarian Action*,<sup>16</sup> the *Inter-Agency Gender-Based Violence Case Management Guidelines*,<sup>17</sup> the *Secretary General's Bulletin on Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)* and the *IASC Six Core Principles Relating to Sexual Exploitation and Abuse*.<sup>18</sup>

It complements and aligns with UNHCR's Policy on Age, Gender, and Diversity (AGD),<sup>19</sup> which includes commitments to women and girls with concrete and measurable actions to strengthen our work in promoting gender equality. It aims to integrate an AGD approach across all areas of UNHCR's work, strengthening accountability to affected people, quality programming, and safe access to services for all survivors.

The UNHCR SGBV Strategy 2011-2016,<sup>20</sup> marked significant progress in decreasing the risk of GBV and improving access to services for survivors. The Strategy delineated six often over-looked areas requiring attention: (1) Protecting children of concern against SGBV; (2) Addressing the sale and exchange of sex as a coping mechanism in situations of displacement;<sup>21</sup> (3) Engaging men and boys; (4) Providing safe environments and safe access to domestic energy and natural resources; (5) Protecting lesbian, gay, bisexual, transgender and intersex PoC against SGBV; and (6) Protecting PoC with disabilities against SGBV.

The Strategy brought much needed attention to these areas. However, sustained work is required to address these challenges, and the six areas must remain a key priority for the Organization's efforts to implement this Policy. Other overlooked areas, which require specific attention include, but are not limited to, programming for adolescent girls and older women, livelihoods programming for those at-risk and survivors, in addition to safe shelters and access to justice.

### 4. DEFINITION OF GENDER-BASED VIOLENCE<sup>22</sup>

**UNHCR adopts the IASC definition of Gender-based violence (GBV) as 'an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (i.e. gender) differences between males and females. It includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private.'**<sup>23</sup>

GBV is based on patriarchal power relations and gender discrimination.<sup>24</sup> The term 'Gender-Based Violence' 'is most commonly used to underscore how systemic inequality between males and females, which exists in every society in the world, acts as a unifying and foundational characteristic of most forms of violence perpetrated against women and girls.'<sup>25</sup> GBV also describes 'the violence perpetrated against women, girls, men and boys with diverse sexual orientations and gender identities as well as non-binary individuals because it is driven by a desire to punish those seen as defying gender norms.'<sup>26</sup>

GBV may be physical, psychological, sexual or socio-economic in nature. It can manifest as rape, sexual assault, physical assault, forced marriage, denial of resources, opportunities, or services as well as psychological or emotional abuse.<sup>27</sup> Common forms of GBV include intimate partner violence, so-called 'honour-related crimes,' child sexual abuse, child marriage, female genital mutilation, and trafficking in persons for the purpose of sexual exploitation, including sexual slavery, domestic servitude, and servile forms of marriage.<sup>28</sup> Sexual exploitation and abuse (SEA) by humanitarian workers is a form of GBV.<sup>29</sup>

Men and boys can be subjected to sexual violence. They may be exposed to sexual violence committed for the 'explicit purpose of reinforcing inequitable gender norms of masculinity and femininity.'<sup>30</sup> In addition, they may also be targeted because of reduced power and status in view of diversity characteristics or other intersecting inequalities.<sup>31</sup> There are 'forms of discrimination that lead to increased risk of sexual violence for men and boys,' including but not limited to 'socioeconomic status, birth country and legal status, including asylum status.'<sup>32</sup> In addition, risks may be heightened for men and boys in detention, unaccompanied children or for children with disabilities.



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Somali refugee women gather to meet the UN High Commissioner for Refugees at the Women's Wellness Centre run by the International Medical Corps in Melkadida Refugee Camp, Ethiopia. 12 February 2019

More recent forms of gender-related violence, such as abuse that occurs online or through electronic media and communication technologies, are also included. GBV can be committed by family and friends, by members of the community or unknown assailants. It may be perpetrated or condoned by the State, non-State actors, or institutions. When GBV is conflict-related and perpetrated by elements affiliated with a State or non-State

armed group, including terrorist organizations, it is referred to as conflict-related sexual violence (CRSV).<sup>33</sup>

This Policy takes a holistic approach to addressing GBV. UNHCR will aim to ensure that all persons at-risk of GBV, and that all survivors of GBV have safe, timely access to interventions and services that meet their specific needs.

## 5. UNHCR'S APPROACH TO PREVENTING, MITIGATING AND RESPONDING TO GBV

GBV prevention, risk mitigation, and response is guided by human rights-based,<sup>34</sup> survivor-centred,<sup>35</sup> AGD, child-friendly and community-based<sup>36</sup> approaches to programming, as well as core humanitarian principles,<sup>37</sup> which place individuals and communities at the center of all programming intended for their benefit. In carrying out work to prevent, mitigate, and respond to GBV, these approaches require a conscious reiteration that:

- A. GBV is a **human rights violation**, primarily affecting women and girls. It can also affect men and boys, and people with diverse sexual orientations and gender identities (SOGI)<sup>38</sup> and backgrounds. It cannot be condoned or justified by cultural norms.
- B. **GBV occurs in all contexts but is under-reported** and establishing and maintaining safe access to quality response services is essential to the protection and assistance delivery of any UNHCR Operation.
- C. Everyone directly or indirectly engaged with survivors must ensure a **survivor-centred approach**, and the following guiding principles:<sup>39</sup>
  - **Respect** by treating survivors with dignity, ensuring their participation, and respecting their decisions;
  - **Confidentiality** by respecting survivors' right to privacy and ensuring that any information about them should only be shared with their informed consent,<sup>40</sup> and in line with data protection principles;<sup>41</sup>
  - **Safety** of the survivor being of primary concern at all times;
  - **Non-discrimination** by treating everyone based on their needs alone.
- D. A 'Do No Harm' approach 'involves taking all measures necessary to avoid exposing people to further harm as a result of our actions.'<sup>42</sup>
- E. The **best interests of the child** are the primary consideration in all decisions affecting girls and boys who are survivors and those at-risk of GBV or affected by GBV.
- F. Information is critical to **empowerment and informed decision-making**, and survivors must receive the information they need to fully exercise their rights.
- G. UNHCR recognizes the **inherent skills, resources, and resilience of PoC**, and is committed to working with them as partners, particularly with women and girls.
- H. UNHCR recognizes the specific needs of all PoC, particularly women and girls, and how multiple forms of oppression and power intersect and influence their experiences and exposure to GBV and safe access to services, including gender inequality, racism, ableism and class inequality and other contextually-relevant systems of power.<sup>43</sup> Applying an **intersectional analysis approach** to UNHCR's work ensures a comprehensive approach to programming through tackling systemic discrimination and exclusion.
- I. For most marginalized women and girls, there is often a need for **targeted services**, such as, safe, static or mobile spaces, to facilitate safe participation.<sup>44</sup> Women and girls should receive dignity kits and/or cash and voucher assistance to reduce GBV risk, and promote safety and dignity, where appropriate.<sup>45</sup>
- J. UNHCR promotes the **non-discriminatory inclusion of PoC** in all public services such as health, social welfare, education, and justice, and where necessary strengthens national systems.<sup>46</sup>
- K. UNHCR **advocates** for States to assume their responsibility to prevent violence, mitigate risks, and respond to survivors' rights and needs in accordance with international standards.
- L. To strengthen national systems to address GBV, UNHCR recognizes the **importance of partnerships** with local civil society and community groups, refugee and internally displaced people (IDP)-led and refugee and IDP women's groups as well as local and national women-led and women-focused organizations.<sup>47</sup>
- M. Gender equality and GBV programming are complementary, not interchangeable. **Gender equality programming is essential** to any long-term effort to address GBV and should be initiated at the outset of any humanitarian response. Gender equality and women's empowerment are cross-cutting issues and should be integrated into every aspect of GBV programming.<sup>48</sup>



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Venezuelan and Brazilian women paint messages of empowerment as part of the 16 days of activism activities against Gender-Based Violence in Boa Vista, Brazil. 7 December 2017

## 6. CORE ACTIONS

Three programme areas of prevention, risk mitigation and response are required to address GBV. The two programme areas of prevention and response refer to specialized GBV interventions whereas risk mitigation is a programme area for all actors to address GBV across all areas of UNHCR's work. To address GBV effectively, UNHCR will undertake interventions in all three programme areas. Implementation requires a multi-faceted and context-specific approach including direct and indirect service delivery, or in-kind assistance or cash and voucher assistance as part of the implementation modalities, as appropriate.<sup>49</sup>

Throughout the core action areas, PoC, in particular women and girls, and groups at heightened risk,<sup>50</sup> must be meaningfully consulted in a participatory process and their feedback must be reflected in programming, advocacy, fundraising, monitoring and evaluation.

### PREVENTION

1. **Prevention** refers to actions that prevent GBV from occurring by addressing its root causes, namely gender inequality, systemic discrimination and unequal power relations between women and men, as well as people with diverse SOGI. Operations will plan and implement context-appropriate programming that aims to transform the systems and social norms that perpetuate gender inequality and discrimination. Programming must address the root causes of GBV in order to effectively change behaviour and social norms, including through long-term approaches, and will require the engagement of men and boys as well as programming that empowers women and girls. Programme design should therefore contribute to dismantle, not reinforce, abusive and unequal power relations. UNHCR will also advocate for and support the inclusion of PoC in related national prevention programming, and through targeted interventions, as appropriate. All GBV prevention programming must be accountable to women and girls and should only be initiated once essential services are in place to respond to incidents.<sup>51</sup>





## RESPONSE

**3. Response** refers to immediate interventions that address survivors' physical safety, health concerns, psychosocial needs, and access to justice, in line with the survivor-centred approach. The provision of multi-sectoral services and assistance to all survivors of GBV contributes to ensuring people's safety, improving physical, mental, sexual and reproductive health, and facilitating access to justice. All survivors of GBV, including survivors of SEA perpetrated by humanitarian workers, have the right to immediate life-saving protection and GBV services. Survivors of SEA should be treated equally as survivors of other forms of GBV. Working with perpetrators of GBV is not the responsibility of GBV response programming.

To ensure that all survivors have safe and meaningful access to adequate, timely and quality specialized GBV services, that meet their specific needs and support long-term recovery and reintegration, Operations will ensure that quality case management and referral pathways are in place. The minimum services must include health,<sup>52</sup> mental health and psychosocial support, safety and security, justice, education, and livelihoods.<sup>53</sup>

GBV services must be accessible to SEA survivors, parallel services should not be established.<sup>54</sup> GBV SOPs and referral pathways should be updated, where necessary, to expressly incorporate SEA survivors.<sup>55</sup> Specialized services for pregnant women survivors, adolescent girl survivors, male survivors of sexual violence and child survivors must be in place.<sup>56</sup>

Specific to UNHCR's mandate, GBV response includes a broader range of rights and international protection mechanisms, such as processing individual identity documentation,<sup>57</sup> refugee status determination as well as durable solutions including resettlement, complementary pathways and voluntary repatriation.

All services and assistance are provided based on the survivor's choice and in line with GBV Guiding Principles, including the survivor-centred approach. For child survivors this should be guided by the best interests of the child. Women and girls must be consulted on the design and delivery of services and assistance to ensure that they can fully and safely benefit from these and other interventions.



## RISK MITIGATION

**2. Risk mitigation** refers to a process and specific interventions in all phases of humanitarian programming. It includes actions that are taken in each humanitarian sector and area of work to reduce risks and exposure to GBV and improve safety as part of an agency-wide mainstreaming approach. Cross-sectoral coordination is essential to ensure a comprehensive approach. Risk mitigation measures also contribute to reducing the risk of SEA. Operations must anticipate and identify GBV risks and take prompt action to mitigate them, including through intervention/advocacy with national authorities and service providers. In order to reduce GBV risks, Operations will integrate risk mitigation interventions into all planning documents, work plans and strategies.



## CASE MANAGEMENT

- Case Management** is a specialized part of response. Processes and tools, that are developed in line with GBV Guiding Principles and safety standards, are essential for UNHCR and partners to consistently provide quality case management services to survivors of GBV. GBV case management services require specialized intervention from a range of service providers to meet a survivor's immediate needs and support long-term recovery.<sup>58</sup> Effective GBV case management ensures adherence to the GBV Guiding principles.<sup>59</sup> Case management for child survivors will be guided by the best interest of the child.<sup>60</sup>

UNHCR Operations will implement and support quality GBV case management that applies a survivor-centred approach, with confidential, non-stigmatizing access to GBV services.<sup>61</sup> It will also promote hiring female case workers with specialized GBV training.<sup>62</sup> Offices must be familiar with the range of quality multi-sectoral services available, and engage regularly with national systems and partners to ensure a coordinated process of referral, service delivery and follow-up is in place.

A key element of a quality case management system is the implementation of information management tools that facilitate the safe and ethical collection, storage, and sharing of survivor-reported data in a standardized and effective manner. Subsequent analysis of data on GBV incidents allows humanitarian actors to plan, implement, and adjust effective and timely prevention, risk mitigation and response measures.

Where data is collected by national authorities or other service providers, UNHCR offices should advocate and provide technical guidance and support for disaggregation of data maintaining data protection principles and GBV Guiding Principles, in order to gain better understanding of the nature and extent of GBV incidents affecting PoC.

proGres v4 is a UNHCR institutional tool and all offices with proGres V4 are required to use the GBV module. Though the use of proGres V4 by partner organizations is not mandatory, UNHCR should facilitate the implementation of proGres v4 for interested partners or ensure they use a reliable system in line with the standards outlined by the Gender-Based Violence Information Management System (GBVIMS).<sup>63</sup> All offices will support partners to implement case and information management systems, where necessary. Data on SEA incidents is to be managed safely and appropriately, in accordance with the GBV Guiding Principles, UNHCR's Data

Protection Policy, and for children in line with UNHCR Best Interests Procedure Guidelines.<sup>64</sup>

UNHCR Operations will only collect survivors' personal data concerning GBV incidents when the survivor has consented and wishes to be referred for protection or assistance in accordance with the GBV Guiding Principles and data protection principles.<sup>65</sup> In the case of children, specific procedures for obtaining consent/assent from parents/caregivers and/or children should be respected, and the best interests of the child must be adhered to.<sup>66</sup>

Where case management is implemented by national systems/service providers, UNHCR should advocate and provide technical guidance and support for the inclusion and non-discriminatory access for PoC within these systems and in accordance with international standards.

To achieve results related to the above three programme areas, this Policy requires Operations to carry out the **following within the operations management cycle (OMC)**:



## ASSESSMENT AND MONITORING

- Assessment and Monitoring** are components of the OMC that inform and influence how resources should be allocated and ensures sound programme design and implementation to meet the specific needs of different groups.

All humanitarian personnel must assume that GBV is occurring.<sup>67</sup> Evidence is not required before taking action and implementing life-saving programming.<sup>68</sup> In all situations GBV response services must be in place before any GBV data collection can ethically begin.

Operations will conduct a GBV situation assessment for each location at least once a year, and it should be linked to relevant assessment, planning and prioritisation processes.<sup>69</sup> The purpose of a GBV assessment is to better understand the types and scope of GBV in a specific context, risk factors, and gaps in services, resource and capacity. It is not to determine prevalence. UNHCR is committed to using participatory methodologies to incorporate the capacities and priorities of PoC, and in the context of GBV especially for women and girls and other persons at heightened risk. However, as part of 'Do No Harm,' GBV survivors should not be sought out or targeted as a specific group during assessments. Any assessment should start with a review of existing assessment data and community members should not be subjected to repeated assessments on the same issue if information is available.



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Painting workshops with youth groups in host communities, internally displaced people and asylum seekers across Iraq. The sessions were organized by UNHCR and its national partners, Qandil, LCN (Legal Clinic Network), Intersos, in collaboration with @aptART (Awareness and Prevention Through Art). Sulaymaniyah, Iraq, 24 May 2017

Monitoring is the systematic and on-going process of collecting, analyzing and using information to track progress towards reaching programme objectives, and to inform management decisions. Operations should plan for a combination of routine protection monitoring, programmatic monitoring and situation monitoring in order to track progress and identify the need for new or adjusted programming.

Assessment and monitoring tools should, preferably and as applicable, be agreed upon with inter-agency actors, government and national authorities, involved in programming and must comply with safety and ethical standards.<sup>70</sup> All information should be collected for a specific purpose and used to design and improve interventions or to advocate for improved programming on GBV. GBV assessments should only be conducted with the technical support of a GBV specialist/qualified and experienced Protection staff.<sup>71</sup> Assessments should be supported by qualified and experienced Protection staff to ensure that all assessments, monitoring and other data collection mechanisms adhere to ethical and safety standards.

## PLANNING, PRIORITIZATION, AND RESOURCE ALLOCATION

### 6. Planning, Prioritization, and Resource Allocation

Allocation must reflect the protection and assistance needs of PoC and address findings from assessments and monitoring.<sup>72</sup> Interventions addressing GBV must be prioritized as lifesaving in multi-year protection and solution strategies as well as in other internal and inter-agency planning processes. Operations need to make provisions for prevention, risk mitigation and response to GBV as a standard element of their operations plan in accordance with relevant guidelines.<sup>73</sup> UNHCR must prioritise effective fundraising to enable sufficient allocation of resources and to put in place measures to address GBV from the onset of an emergency. Operations will allocate, and advocate for resources for GBV prevention, risk mitigation, and response, and monitor implementation and results as part of their protection and solutions strategies and operations plans, including in situations of internal displacement.<sup>74</sup>

The **following core actions** are enablers for the three programme areas of prevention, risk mitigation and response. They are also enablers for assessment, monitoring and reporting, as well as planning, prioritization, and resource allocation:

## PARTNERSHIPS AND COORDINATION

7. **Partnerships and Coordination** with host governments, PoC, international and national NGOs, Red Cross and Red Crescent National Societies, United Nations agencies, inter-governmental and community-based organizations, the private sector, local and women-led or women-focused organizations, host communities and faith-based organizations, lead to better protection, assistance, and lasting solutions for PoC. Partnership and good coordination to address GBV enhances effective response, reduces duplication, ensures standards are met, and increases accountability to affected populations.

In line with and the Global Compact on Refugees,<sup>75</sup> the Grand Bargain<sup>76</sup> and the Principles of Partnership,<sup>77</sup> operations will work through a multi-stakeholder and multi-partnership approach. UNHCR will diversify our partnerships to particularly include, women-led organizations and groups, and organizations offering specialized GBV programming, and enhance coordination to deliver quality services and programming that meet international standards.<sup>78</sup>

Under the Refugee Coordination Model,<sup>79</sup> UNHCR leads or co-leads GBV coordination together with partners. UNHCR also leads or co-leads all other sectors in refugee contexts. In internal displacement contexts, UNHCR leads on protection, while UNFPA leads the GBV Area of Responsibility and the sub-cluster at country level.<sup>80</sup> In discharging its cluster and/or sector obligations UNHCR will promote GBV risk mitigation and mainstreaming and ensure that GBV is included in assessments and funding submissions. Specifically, any critical gaps will be flagged to humanitarian partners to support the sub-cluster to meet its responsibilities. As an operational member of the Protection Cluster, UNHCR will also implement GBV programmes in IDP contexts. The Global Coordinators and Co-ordinators and Cluster Coordinators/Co-ordinators will work with the Inter-Sector Working Group, the Humanitarian Coordinator, donors and other stakeholders, including PSEA Networks and Coordinators, where they are in place, to mobilize the necessary resources and reinforce advocacy.<sup>81</sup>

Operations will advocate and support the establishment or strengthening of national coordination mechanisms and include local and national responders in inter-agency coordination. Operations are encouraged to identify local organizations with GBV expertise, including women-led organizations, to co-chair GBV sub-working groups. Where national authorities lead coordination and response services, UNHCR Operations should identify available national services and their coordination and seek to reinforce them where needed.

## STAFFING

8. **Staffing**<sup>82</sup> is one of the key factors that determine the extent to which measures are in place to prevent, mitigate and respond to GBV. UNHCR management<sup>83</sup> is responsible for putting in place workforce arrangements to provide dedicated expertise for effective specialized programming and coordination on GBV prevention and response depending on the operational set-up and capacity of national actors.<sup>84</sup> This responsibility also extends to ensuring the existence of relevant capacity and expertise in all technical areas, particularly public health and with respect to protection from SEA. Workforce arrangements will take into consideration the need to hire female workforce members. UNHCR offices will advocate for appropriate workforce levels within national authorities and partner organizations, as required.

## KNOWLEDGE AND CAPACITY

9. **Knowledge and Capacity** of all UNHCR workforce will be bolstered with a focus on appropriate behaviours, skills and attitudes in order to promote gender equality and to prevent, mitigate, and respond to GBV, and child protection in the case of programming addressing GBV against children. UNHCR will continue to develop the capacity of its workforce and partners, including national authorities and civil society, to address GBV through context-appropriate learning initiatives, such as online courses and in-person training on GBV. All UNHCR workforce should complete the appropriate level of GBV e-learning module found on UNHCR's Learn & Connect.<sup>85</sup>



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Empowerment messages painted by women survivors of gender-based violence: “We want to be alive. Do not touch, do not rape, do not kill our bodies”. Salcedo, Ecuador, 22 July 2020

## 7. MAINSTREAMING MEASURES TO ADDRESS GBV

Mitigation specifically refers to reducing the risk of exposure of GBV.<sup>86</sup> To mainstream effective GBV risk mitigation measures in all programming and service delivery, members of the workforce need to understand who is at risk, the source of that risk, and the (un)intended impact of acting or not acting to mitigate the risk of GBV within their respective functions.

The proactive and ongoing process of mainstreaming is a shared responsibility whereby all colleagues, and multi-functional teams (MFTs), must consider GBV and take measures to reduce exposure to identified risks at all stages of the OMC and the displacement continuum. Mainstreaming responsibilities require specific actions to be undertaken in preparedness, needs assessment, strategic planning, resource mobilization, implementing and reporting.<sup>87</sup>

Applying the four elements of protection mainstreaming (i.e. safety and dignity, non-discrimination/meaningful access, accountability and participation, and empowerment) in all sectors and areas of work will contribute to mitigating the risk of GBV.<sup>88</sup> In contexts where national authorities lead programmes and service delivery or where there is inclusion into national systems, UNHCR will advocate for and support the integration of appropriate mainstreaming measures.

Mainstreaming also requires that all UNHCR workforce, and partners be appropriately trained to safely handle disclosures of GBV incidents and to make referrals. This includes incidents reported directly or indirectly.<sup>89</sup> All members of the workforce, within the context of their role and function, must apply the GBV Guiding Principles, and ensure that survivors are referred to services as requested. The limits of role and function means that case management and related service provision should only be undertaken by specialized GBV and/or qualified and experienced Protection staff.

## 8. CORE ACTION OUTCOMES

The following nine core action outcomes will be pursued by UNHCR Operations. A package of Operational Guidance Notes is available to provide more explanation on the core actions.

	EXPECTED OUTCOME	CORE ACTION
<b>Prevention</b>	GBV is prevented by addressing gender inequality, discrimination and unequal power relations <sup>90</sup>	Operations will advocate, plan and implement prevention programming that promotes gender equality and that aims to address the root causes of GBV in order to effectively change behaviour and social norms, including through long-term approaches, that are accountable to women and girls
<b>Risk Mitigation</b>	GBV is anticipated and risks identified across all sectors and areas of work, and, prompt action is taken to mitigate these risks <sup>91</sup>	Operations will contextually integrate GBV risk mitigation measures into all work plans and strategies
<b>Response</b>	All survivors have timely, safe and adequate access to quality GBV services <sup>92</sup>	Operations will ensure that (or advocate for, where applicable) quality case management systems and referral pathways are in place and that all survivors have safe and meaningful access to, at a minimum, services for health, mental health and psychosocial support, safety and security, justice, education, and livelihoods
<b>Case &amp; Information Management</b>	Survivors receive quality case management services in accordance with GBV Guiding Principles; and effective and timely prevention, risk mitigation, and response measures are in place, based on data collected, stored, shared and analysed in a safe and ethical manner	Operations conducting and supporting partners with case management will use the GBV Minimum Standards as a basis for case management services to provide quality survivor-centred GBV case management services. For child survivors, UNHCR Best Interest Procedures Guidelines must be applied.
<b>Assessment and Monitoring</b>	GBV gaps and risks, including risks of SEA, are identified throughout GBV assessments and monitoring and progress is tracked to inform advocacy and programming	Operations will conduct a GBV assessment for each location at least once a year, linked to relevant assessment and planning and prioritisation processes <sup>93</sup>
<b>Planning, Prioritization, and Resource Allocation</b>	Protection needs and GBV risks determine planning priorities and resource allocation	Operations will advocate and allocate resources for GBV prevention, risk mitigation across sectors and areas of work, and response programming
<b>Partnerships and Coordination</b>	Through an expanded and diversified range of partners, timely and quality services are established and coordinated to prevent and respond to GBV	Operations will expand and diversify partners, and ensure a functioning coordination mechanism for GBV prevention and response
<b>Staffing</b>	Skilled and experienced members of the workforce lead effective programming and coordination on GBV prevention, response and risk mitigation	Operations will put in place and advocate for workforce arrangements to provide GBV expertise for effective programming and coordination
<b>Knowledge &amp; Capacity</b>	UNHCR workforce has and applies the knowledge and skills needed to promote gender equality and to prevent, mitigate, and respond to GBV	Operations will continuously develop the capacity of their workforce and partners to address GBV by promoting online courses and conducting in-person training

## 9. LEADERSHIP

Leadership requires all managers and members of the workforce to uphold the highest standards of Code of Conduct and to model and shape behaviours and attitudes consistent with the values of the United Nations.<sup>94</sup> There is no room for misunderstanding or complacency regarding the urgent need to address GBV.<sup>95</sup>

Strong leadership on GBV prevention, risk mitigation, and response is required at all levels to combat the incidence of GBV in humanitarian

contexts and to ensure that teams know their accountabilities, responsibilities and roles in implementing this Policy. Members of the workforce with accountability at the global, regional and operational levels must integrate GBV in all strategic directions, continuously reinforce GBV as an institutional priority and hold each other accountable to achieve results.

Implementing programmes and interventions addressing GBV is a priority for managers and their teams. Effective results require resources, workforce arrangements, and measurable actions to be implemented across all sectors and areas of work. These will be monitored for quality and also for compliance against a Policy Monitoring Framework.



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World Refugee Day in Thessaloniki, Greece. 20 June, 2019.

## 10. ACCOUNTABILITIES, RESPONSIBILITIES AND ROLES

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**Representatives** are accountable for the implementation and monitoring of this Policy, reporting results and adequate allocation of resources in respective Operations. In addition, they will consistently emphasize in all their communications with members of the workforce, and in advocacy with partners, governments, and donors, the need to implement specific measures to address GBV prevention, risk mitigation, and response and to advance the implementation of this Policy. All UNHCR Offices must assess the operational and reputational risk posed by GBV and update the Operations' Risk Register to reflect this information. This must be done in a safe and ethical manner and must not compromise GBV Guiding Principles.<sup>96</sup>

**Regional Directors** will support Country Offices and will ensure compliance with monitoring requirements. They will also ensure that the Country Offices in their regions receive technical support and guidance on this Policy as required, in coordination with Division of International Protection (DIP). Regional Bureaux will keep abreast of protection contexts, as well as developments in GBV prevention, risk mitigation, and response impacting PoC within regions. Technical support, advice and assistance, as well as the exchange of information and practices, will be facilitated within regions and shared with HQ (DIP) for cross-fertilization across regions. The development of regional strategies or action plans may assist in the operationalization of the Policy.

**Division Directors** will ensure, in consultation with Regional Bureaux, that technical guidance and support, assessments, policies, strategies, monitoring tools, guidance documents, and learning initiatives are consistent with and promote this Policy and inter-agency standards. They will provide oversight for the areas of this Policy that fall under their accountability, including when implemented by UNHCR-led Global Clusters and flag issues of non-compliance to the appropriate entity as relevant.

**Division of International Protection (DIP)** through the GBV Unit, will provide technical support in the form of standardized tools, advice, training, sharing of good practices and other assistance on programming, strategy, advocacy and policy for prevention, risk mitigation and response across the Organization, in consultation with Regional Bureaux. DIP will monitor how the Policy is implemented by aggregating and analyzing data from the Policy Monitoring Framework, reporting the results, and recommending course corrections to guarantee global consistency and coherence.

**The Assistant High Commissioner for Protection (AHC-P)** will provide leadership, direction and guidance on the operationalization of this Policy. The AHC-P will also oversee the implementation of measures on prevention, risk mitigation and response to GBV across respective accountabilities and apprise the Senior Executive Team (SET) on progress.

**The Assistant High Commissioner for Operations (AHC-O)** will oversee the implementation of measures on prevention, risk mitigation and response across respective accountabilities and apprise the SET on progress.

**The Deputy High Commissioner** will support the operationalization of this Policy through proactive resource mobilization, strategic planning and the implementation of adequate workforce arrangements and apprise the SET on progress.

**The High Commissioner** will ensure that regular monitoring of the implementation progress is discussed by the SET and that overall leadership and direction is provided.





© UNHCR/Vincent Tremeau  
Adolescent girls attend a youth club in Kutupalong refugee camp, Cox's Bazar, Bangladesh. 30 January 2020

## 11. MONITORING AND COMPLIANCE

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DIP will monitor the implementation of this Policy in collaboration with the Regional Bureaux and the Operations. A Policy Monitoring Framework and Operational Guidance will accompany this Policy.

The Regional Bureaux will ensure compliance of this Policy among Operations in the respective Regions and will report annually using a standard mandatory Policy Monitoring Framework reflecting all core actions.<sup>97</sup> The Regional Bureaux will complete a regional analysis and submit this analysis report together with the operation-specific submissions to HQ (DIP). Reporting to HQ will be completed each year by the 31<sup>st</sup> of January, covering the period of the previous year.

The results in these reports shall form a basis for programme re-prioritization and adaptation as required. An aggregated summary of the findings will be made available in the public domain by HQ.

## 12. DATES

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This Policy will be effective as of the date of release.

## 13. CONTACT

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The contact person for this Policy is the Deputy Director, Field Protection Service, Division of International Protection. The GBV Unit in the Field Protection Service is available to respond to questions related to the implementation of this Policy ([hqgbv@unhcr.org](mailto:hqgbv@unhcr.org)).

## 14. HISTORY

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This Policy is UNHCR's first on GBV prevention, risk mitigation and response. The Operational Guidance for each core action accompanying this Policy reflects the most current set of priorities and direction for the Organization to operationalize GBV programming in accordance with global standards. This Policy incorporates certain elements of and supersedes the following:

[2006 IOM/FOM No. 62 Standard Operating Procedures for Prevention of and Response to SGBV](#)

[2011 IOM/038/FOM039 Action against Sexual and Gender-Based Violence: an updated Strategy](#)

[2012 IOM58/FOM59 Access to Justice for Victims of Sexual and Gender-based Violence](#)

In relation to UNHCR's work on GBV prevention, risk mitigation and response, this Policy also supersedes the following:

[2008 UNHCR Handbook for the protection on women and girls](#)

[2008 UNHCR Guidance Note on Refugee Claims Relating to Sexual Orientation and Gender Identity](#)

[2012 UNHCR Working with Men and Boy Survivors of Sexual and Gender-Based Violence in Forced Displacement](#)



# ENDNOTES

- <sup>1</sup> UNHCR has historically used the term sexual and gender-based violence (SGBV), often used interchangeably with gender-based violence, but with the issuance of this Policy consciously uses the term gender-based violence (GBV).
- <sup>2</sup> Under international human rights law, acts of GBV constitute violations. See United Nations General Assembly resolution 34/180 (1979), Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), available from <https://undocs.org/pdf?symbol=en/a/res/34/180>. See also, UN General Assembly Resolution, A/RES/48/104, Declaration on the Elimination of Violence against Women (DEVAW) which recognises that the violence against women is a manifestation of historically unequal power relations between men and women, and which have led to the domination over and discrimination against women by men and to the prevention of the full advancement of women, available from <https://undocs.org/en/A/RES/48/104>.
- <sup>3</sup> 'All survivors' in the Policy refers to the survivors among PoC to UNHCR who disclose an incident of GBV and request for assistance to respond to the consequences of this violence. Survivors can be women, girls, men or boys. With respect to the use of terminology of survivor or victim, please see footnote 35.
- <sup>4</sup> 'Operation' refers to a Country Office, including Multi-Country Offices (MCOs) headed by a Representative as per the Country Office Roles, Accountabilities and Authorities 2019. A list of Operations is available from <http://reporting.unhcr.org/operations>.
- <sup>5</sup> UNHCR 'workforce' comprises staff members and affiliates.
- <sup>6</sup> UN High Commissioner for Refugees (UNHCR), Handbook on Procedures and Criteria for Determining Refugee Status and Guidelines on International Protection Under the 1951 Convention and the 1967 Protocol Relating to the Status of Refugees, 2019, HCR/1P/4/ENG/REV. 4, available from [www.refworld.org/docid/5cb474b27.html](http://www.refworld.org/docid/5cb474b27.html).
- <sup>7</sup> See IASC GBV Guidelines for Integrating GBV Interventions in Humanitarian Action, 2015, Part 1, available from <https://gbvguidelines.org>.
- <sup>8</sup> CERF (United Nations Central Emergency Response Fund), 2010, CERF Life-Saving Criteria, available from [https://cerf.un.org/sites/default/files/resources/FINAL\\_Life-Saving\\_Criteria\\_26\\_Jan\\_2010\\_\\_E\\_0.pdf](https://cerf.un.org/sites/default/files/resources/FINAL_Life-Saving_Criteria_26_Jan_2010__E_0.pdf).
- <sup>9</sup> UNHCR and the 2030 Agenda, available from [www.refworld.org/docid/59db4b224.html](http://www.refworld.org/docid/59db4b224.html).
- <sup>10</sup> For more information see Agenda for Humanity, available from [www.agendaforhumanity.org/](http://www.agendaforhumanity.org/).
- <sup>11</sup> The Global Compact 'represents the political will and ambition of the international community as a whole for strengthened cooperation and solidarity with refugees and affected host countries.' See the Global Compact on Refugees, available from [www.unhcr.org/gcr/GCR\\_English.pdf](http://www.unhcr.org/gcr/GCR_English.pdf).
- <sup>12</sup> The Call to Action on Protection from Gender-Based Violence in Emergencies is a multi-stakeholder initiative that aims to drive change and foster accountability so that every humanitarian effort, from the earliest stage of a crisis, includes the policies, systems and mechanisms to mitigate GBV, especially violence against women and girls, and to provide safe and comprehensive services to those affected. For more information see [www.calltoactiongbv.com/what-we-do](http://www.calltoactiongbv.com/what-we-do).
- <sup>13</sup> UN Action against Sexual Violence in Conflict is a network of international organizations supporting the work of the Special Representative of the Secretary General on Sexual Violence in Conflict. For more information see [www.un.org/sexualviolenceinconflict/about-us/un-action/](http://www.un.org/sexualviolenceinconflict/about-us/un-action/). As a UN Agency, UNHCR has a responsibility to contribute to the Monitoring, Analysis and Reporting Arrangements on conflict-related sexual violence (CRSV) (MARA) as established by SCR 1960. More information can be found in The Technical Note on UNHCR's Engagement of the Protection Mechanisms Established by Security Council Resolutions 1612 and 1960 (MRM and MARA), 2018, available from [www.refworld.org/pdfid/5a6edf734.pdf](http://www.refworld.org/pdfid/5a6edf734.pdf).
- <sup>14</sup> The GBV Accountability Framework, available from <https://reliefweb.int/sites/reliefweb.int/files/resources/GBV%20Accountability%20Framework.pdf>.
- <sup>15</sup> The Inter-Agency Minimum Standards for Gender-Based Violence in Emergencies Programming, GBV AoR, 2019, available from <https://www.unfpa.org/minimum-standards>. For protracted situations 'where multisectoral services are in place, the Minimum Standards may be used to achieve or maintain adequate quality', GBV Minimum Standards, p. xvi.
- <sup>16</sup> Supra note 7, part 1.
- <sup>17</sup> The Inter-Agency Gender-Based Violence Case Management Guidelines, 2017, available from [https://reliefweb.int/sites/reliefweb.int/files/resources/interagency-gbv-case-management-guidelines\\_final\\_2017\\_low-res.pdf](https://reliefweb.int/sites/reliefweb.int/files/resources/interagency-gbv-case-management-guidelines_final_2017_low-res.pdf).
- <sup>18</sup> The IASC Six Core Principles Relating to Sexual Exploitation and Abuse, 2019, available from <https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse>. This Policy takes note of the UNHCR 2020-2022 Strategy and Action Plan for Tackling Sexual Exploitation and Abuse and Sexual Harassment, available from [www.unhcr.org/5f3cfec44](http://www.unhcr.org/5f3cfec44).
- <sup>19</sup> See UNHCR Policy on Age, Gender and Diversity, 2018, available from [www.unhcr.org/5aa13c0c7.pdf](http://www.unhcr.org/5aa13c0c7.pdf).
- <sup>20</sup> UNHCR Action against Sexual and Gender-Based Violence: An Updated Strategy, 2011, available from [www.unhcr.org/protection/women/4e1d5aba9/unhcr-action-against-sexual-gender-based-violence-updated-strategy.html](http://www.unhcr.org/protection/women/4e1d5aba9/unhcr-action-against-sexual-gender-based-violence-updated-strategy.html).
- <sup>21</sup> Although the term 'survival sex' was used in the UNHCR Action against Sexual and Gender-Based Violence: An Updated Strategy, *ibid.*, this Policy indicates updated terminology to reflect a rights-based approach, in line with emerging global guidance.
- <sup>22</sup> For the full definition and explanation see IASC GBV Guidelines for Integrating GBV Interventions in Humanitarian Action, *supra* note 7, and the GBV Minimum Standards, *supra* note 15.
- <sup>23</sup> *Supra* note 7, p. 5.
- <sup>24</sup> *Supra* note 2. Also see the Convention on the Rights of the Child, 1989, available from [www.ohchr.org/en/professionalinterest/pages/crc.aspx](http://www.ohchr.org/en/professionalinterest/pages/crc.aspx) and its Optional Protocols: the Optional Protocol to the Convention on the Rights of the Child on the involvement of children in armed conflict, 2000, available from [www.ohchr.org/en/professionalinterest/pages/opaccrc.aspx](http://www.ohchr.org/en/professionalinterest/pages/opaccrc.aspx) and the Optional Protocol to the Convention on the Rights of the Child on the sale of children, child prostitution and child pornography, 2000, available from [www.ohchr.org/EN/ProfessionalInterest/Pages/OPSCCRC.aspx](http://www.ohchr.org/EN/ProfessionalInterest/Pages/OPSCCRC.aspx). See also UN Executive Committee of the High Commissioner's Programme Conclusion on Children at Risk, A/AC.96/1048, 2007, available from [www.unhcr.org/471615cb2.html](http://www.unhcr.org/471615cb2.html).
- <sup>25</sup> *Supra* note 7, p. 5.

- <sup>26</sup> OHCHR, Discriminatory Laws and Practices and Acts of Violence against Individuals Based on their Sexual Orientation and Gender Identity, 2011, available from [www.ohchr.org/Documents/Issues/Discrimination/LGBT/A\\_HRC\\_29\\_23\\_One\\_pager\\_en.pdf](http://www.ohchr.org/Documents/Issues/Discrimination/LGBT/A_HRC_29_23_One_pager_en.pdf).
- <sup>27</sup> The six core GBV types were created for data collection and statistical analysis of GBV. They should be used only in reference to GBV even though some may be applicable to other forms of violence which are not sexual in nature or gender-based. For more information see the Gender-Based Violence Information Management System (GBVIMS), available from <http://www.gbvims.com/>.
- <sup>28</sup> For more information on this see Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences: Thematic report on servile marriage, A/HRC/21/41, 2012, available from <https://undocs.org/pdf?symbol=en/A/HRC/21/41> and The Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices Similar to Slavery, 1957, available from [www.ohchr.org/Documents/ProfessionalInterest/slaverytrade.pdf](http://www.ohchr.org/Documents/ProfessionalInterest/slaverytrade.pdf).
- <sup>29</sup> The terms 'sexual exploitation' and 'sexual abuse' are defined by the 2013 Secretary-General's Bulletin, as follows 'The term '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. Similarly, the term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.' See Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13), 2013, available from <https://undocs.org/ST/SGB/2003/13>.
- <sup>30</sup> Supra note 7, p.5.
- <sup>31</sup> Supra note 15, p. vii.
- <sup>32</sup> Supra note 15, pp. 6-8.
- <sup>33</sup> The definition of conflict-related sexual violence (CRSV) has evolved through a series of Security Council Resolutions – 1325 (2000); 1820 (2009), 1888 (2009); 1889 (2010); 1960 (2011); 2106 (2013); 2122 (2013); 2242 (2015) and 2467 (2019). For more information see [www.un.org/sexualviolenceinconflict/digital-library/resolutions/](http://www.un.org/sexualviolenceinconflict/digital-library/resolutions/). UNHCR supports actions to promote gender equality and encourage displaced women to take part in peace and security mechanisms and processes as part of the Women, Peace and Security Agenda.
- <sup>34</sup> A [human rights-based approach](http://www.ohchr.org/Documents/Publications/FAQen.pdf) is a conceptual framework for the process of human development that is normatively based on international human rights standards and operationally directed to promoting and protecting human rights. For more information see OHCHR, FAQ, available from [www.ohchr.org/Documents/Publications/FAQen.pdf](http://www.ohchr.org/Documents/Publications/FAQen.pdf).
- <sup>35</sup> While this Policy uses the term survivor in line with the IASC GBV Guidelines and the GBV Minimum Standards, we acknowledge that the term victim is used in certain contexts. In particular, the current approach of the UN in relation to prevention and response to sexual exploitation and abuse and sexual harassment is to use the term victim. As an example, see <https://www.un.org/preventing-sexual-exploitation-and-abuse/content/role-victims%E2%80%99-rights-advocate>.
- <sup>36</sup> A community-based approach is a way of working in partnership with PoC during all stages of UNHCR's programme cycle. For more information see UNHCR, A community-based Approach in UNHCR Operations, 2008, available from [www.unhcr.org/publications/legal/47ed0e212/community-based-approach-unhcr-operations.html](http://www.unhcr.org/publications/legal/47ed0e212/community-based-approach-unhcr-operations.html).
- <sup>37</sup> The four guiding humanitarian principles are humanity, neutrality, impartiality, and independence. See U.N.G.A. Resolution 58/114, 2004, available from <https://undocs.org/A/RES/58/114>.
- <sup>38</sup> See UNHCR Need to Know Guidance 2, Working with Lesbian, Gay, Bisexual, Transgender and Intersex Persons in Forced Displacement, 2011, available from [www.refworld.org/pdfid/4e6073972.pdf](http://www.refworld.org/pdfid/4e6073972.pdf).
- <sup>39</sup> The full definition of the GBV Guiding Principles including the survivor-centred approach can be found in the GBV Minimum Standards, supra note 15, pp. xi; 2-9.
- <sup>40</sup> There are limitations to confidentiality and sharing information based on informed consent, such as situations where there 'are concerns about the immediate physical safety of survivors or co-survivors, such as the physical safety of children or in cases when you may be concerned that a survivor may harm themselves,' or where there are mandatory reporting laws in country or organizational mandatory reporting policies with regard to SEA. For more details on the limitations see the Inter-Agency Gender-based Violence Case Management Guidelines, supra note 17, p. 51.
- <sup>41</sup> Members of UNHCR's workforce are required to strictly comply with the principles and safeguards in the UNHCR Policy on the Protection of Personal Data of Persons of Concern to UNHCR, 2015, available from [www.refworld.org/docid/55643c1d4.html](http://www.refworld.org/docid/55643c1d4.html). See also the United Nations System High Level Committee on Management, Principles on Personal Data Protection and Privacy, available from [www.unsceb.org/privacy-principles](http://www.unsceb.org/privacy-principles).
- <sup>42</sup> Supra note 15, p. xi.
- <sup>43</sup> Supra note 15, p. 5.
- <sup>44</sup> Supra note 15, p. 14.
- <sup>45</sup> Supra note 15, pp. 84-91.
- <sup>46</sup> The GBV Minimum Standards, describes 'national systems' as it relates 'primarily to government systems (at national, subnational and local levels) and may include other stakeholders such as nongovernmental, community-based and civil society organizations who contribute to functioning health, protection and legal systems.' Supra note 15, p. ix.
- <sup>47</sup> For more information see <https://interagencystandingcommittee.org/grand-bargain>.
- <sup>48</sup> Supra note 15, p. viii.
- <sup>49</sup> See the GBV Cash Compendium for more information on cash-based interventions, available from <https://reliefweb.int/report/world/cash-voucher-assistance-and-genderbased-violence-compendium-practical-guidance>. See also, UNHCR-WFP, Mitigating Risks of Abuse of Power in Cash Assistance, available from [www.unhcr.org/protection/operations/5c7925954/unhcr-wfp-mitigating-risks-abuse-power-cash-assistance.html](http://www.unhcr.org/protection/operations/5c7925954/unhcr-wfp-mitigating-risks-abuse-power-cash-assistance.html).
- <sup>50</sup> Individuals who may be at heightened risk can include persons with disabilities, adolescent girls, unaccompanied children, and persons with diverse SOGI among others. See IASC GBV Guidelines, supra note 7, pp. 12-13.
- <sup>51</sup> Supra note 15, pp. 98-104.
- <sup>52</sup> The Minimum Initial Service Package for Reproductive Health in Crisis Situations, available from [www.unhcr.org/4e8d6b3b14.pdf](http://www.unhcr.org/4e8d6b3b14.pdf). See the WHO Clinical management of rape and intimate partner violence survivors. Developing protocols for use in humanitarian settings, 2020, available from <https://apps.who.int/iris/bitstream/handle/10665/331535/9789240001411-eng.pdf?ua=1>
- <sup>53</sup> Supra note 15, p. 48 and relevant Standards for more information.

<sup>54</sup> Supra note 15, p. 23.

<sup>55</sup> UNHCR is committed to zero-tolerance on sexual exploitation and abuse, which entails separate administrative procedures, and which are beyond the scope of GBV programming and this Policy. See also, UNHCR, Tackling sexual exploitation and abuse, and sexual harassment at UNHCR: An information note, 2018, available from [www.unhcr.org/publications/manuals/5aa29a2e7/tackling-sexual-exploitation-abuse-sexual-harassment-unhcr-information.html%20accessed%2013%20February%202019](http://www.unhcr.org/publications/manuals/5aa29a2e7/tackling-sexual-exploitation-abuse-sexual-harassment-unhcr-information.html%20accessed%2013%20February%202019).

<sup>56</sup> Supra note 15, pp. 32-34.

<sup>57</sup> Women and girls are provided with individual registration and documentation, directly or through support provided by UNHCR. For more information see the UNHCR Policy on Age, Gender and Diversity, supra note 19.

<sup>58</sup> For a description see the Inter-Agency Minimum Standards for GBV in Emergencies Programming, supra note 15, p. 44.

<sup>59</sup> Supra note 15, pp. xi-xii.

<sup>60</sup> See UNHCR Guidelines on Assessing and Determining the Best Interests of the Child Provisional Release, 2018, available from <https://www.refworld.org/pdfid/5c18d7254.pdf>.

<sup>61</sup> See supra note 15, pp. 44-51.

<sup>62</sup> In certain situations, UNHCR may conduct GBV case management through direct implementation, but only in the absence of quality GBV case management services available through national systems or by a qualified specialized partner, that also provides services such as safe spaces and employs social workers with specialized GBV expertise.

<sup>63</sup> For more information on GBVIMS see supra note 27.

<sup>64</sup> UNHCR is a member of the global team of the GBVIMS, an inter-agency initiative created to harmonize the safe and ethical data collection on GBV in humanitarian settings and continues to support its implementation. Ibid.

<sup>65</sup> GBV case management has strict information-sharing practices to ensure ethical sharing of information in line with GBV Guiding Principles. Supra note 40 & 41 for limitations to confidentiality as well as the UNHCR Data Protection Policy, 2015, available from [www.refworld.org/docid/55643c1d4.html](http://www.refworld.org/docid/55643c1d4.html).

<sup>66</sup> Supra note 60.

<sup>67</sup> Supra note 7, p. 2.

<sup>68</sup> Collecting prevalence data in emergencies is not recommended due to methodological and contextual challenges. Supra note 7, p. 7.

<sup>69</sup> 'Location' here refers to areas where PoC reside. The regularity of GBV situational assessments will be inevitably impacted by the nature of the operational and advocacy presence of UNHCR in a given country, and the capacity of national actors.

<sup>70</sup> For more information on the ethical considerations, see supra note 15, pp. 122-131. Assessment does not include incident verification or any process of sharing identifiable or aggregated data not in accordance with the GBV Guiding Principles and data protection principles.

<sup>71</sup> It is recommended that Protection staff will have taken the 3 levels of e-learning and have completed the GBV Training of Trainers Learning Programme. If expertise is not available within the Operation, support should be sought from the respective Bureau.

<sup>72</sup> The risks, along with the corresponding plans to treat them, and the responsible treatment owners should be included in the Operations' Risk Register.

<sup>73</sup> This will be undertaken with due regard for the nature of the operational and advocacy presence of UNHCR in given country and the capacity of national actors. Supra note 7, supra note 15 and supra note 17.

<sup>74</sup> UNHCR operations in internally displaced people (IDP) situations should prioritize interventions to prevent, mitigate and respond to the most urgent and immediate protection risks and needs, including PSEA and GBV. For more information see the Policy on UNHCR's Engagement in Situations of Internal Displacement, 2019, available from [www.unhcr.org/50f951df9](http://www.unhcr.org/50f951df9).

<sup>75</sup> See the Global Compact on Refugees, 2018, A/73/12 (Part II) para. 3.2, supra note 11.

<sup>76</sup> As an initiative of the Agenda for Humanity, the Grand Bargain is an agreement between some of the largest donors and aid providers, which aims to get more means into the hands of people in need. For more information see <https://interagencystandingcommittee.org/grand-bargain-hosted-iasc/>.

<sup>77</sup> The principles of partnership are equality, transparency, results oriented, responsibility and complementarity. For more information see [www.unhcr.org/5735bd464.pdf](http://www.unhcr.org/5735bd464.pdf).

<sup>78</sup> The GBV Minimum Standards define standards for agencies working on specialized GBV programming. Supra note 15.

<sup>79</sup> For more information on the Refugee Coordination Model (RCM) see <https://emergency.unhcr.org/entry/38270/refugee-coordination-model-rcm>.

<sup>80</sup> In mixed situations, where the RCM and the Cluster System interface, UNHCR Representatives maintain accountability and leadership of all refugee related issues. For more information see Operational Guidelines for UNHCR's Engagement in Situations of Internal Displacement, 2016, available from [www.refworld.org/docid/571a20164.html](http://www.refworld.org/docid/571a20164.html).

<sup>81</sup> See the Statement by the IASC Principals on the Centrality of Protection in Humanitarian Action, 2013, available from [https://interagencystandingcommittee.org/system/files/the\\_centrality\\_of\\_protection\\_in\\_humanitarian\\_action\\_english.pdf](https://interagencystandingcommittee.org/system/files/the_centrality_of_protection_in_humanitarian_action_english.pdf) and the IASC Policy on Protection in Humanitarian Action, 2016, available from [https://interagencystandingcommittee.org/system/files/iasc\\_policy\\_on\\_protection\\_in\\_humanitarian\\_action.pdf](https://interagencystandingcommittee.org/system/files/iasc_policy_on_protection_in_humanitarian_action.pdf).

<sup>82</sup> Staffing refers both to numbers and also the time dedicated by members of the workforce to actions on prevention, risk mitigation and response.

<sup>83</sup> See internal document, UNHCR Administrative Instruction New Resource Allocation Framework – Part 1 Delegation of Authority for Management Structures, Financial and Staffing Resources during Programme Implementation, 2020, UNHCR/A1/2019/7/Rev.1, 2020, available from [https://intranet.unhcr.org/content/dam/unhcr/intranet/policy-guidance/en/2019/unhcr-a1-2019-7-rev-1/01\\_RAF\\_Rev.1\\_Main\\_Instruction.pdf](https://intranet.unhcr.org/content/dam/unhcr/intranet/policy-guidance/en/2019/unhcr-a1-2019-7-rev-1/01_RAF_Rev.1_Main_Instruction.pdf).

<sup>84</sup> Workforce arrangements should be guided by the Core Competencies for GBV Program Managers and Coordinators in Humanitarian Settings, 2014, available from [www.refworld.org/docid/5c3704637.html](http://www.refworld.org/docid/5c3704637.html).

<sup>85</sup> For more information see UNHCR Learn and Connect, available from <https://unhcr.csod.com>.

<sup>86</sup> See supra note 7, p.1. Integration here refers to mainstreaming and is distinct from 'integrated programming,' which 'involves incorporating

protection objectives into the programming of other sector-specific responses (i.e. beyond the protection sector response) to achieve protection outcomes.' See also the IASC Policy on Protection in Humanitarian Action, supra note 81.

<sup>87</sup> See the GBV Accountability Framework, supra note 14.

<sup>88</sup> See the Global Protection Cluster for more information, available from [www.globalprotectioncluster.org/themes/protection-mainstreaming/](http://www.globalprotectioncluster.org/themes/protection-mainstreaming/).

<sup>89</sup> For more information see the GBV Pocket Guide, How to support survivors of gender-based violence when a GBV actor is not available in your area, available from <https://gbvguidelines.org/en/pocketguide/>. See supra note 40 and 41 for limitations to confidentiality and the UNHCR Data Protection Policy.

<sup>90</sup> The primary document guiding the quality implementation of this outcome area is The GBV Minimum Standards, supra note 15.

<sup>91</sup> The primary documents guiding the quality implementation of this outcome are the IASC GBV Guidelines, supra note 7 and The GBV Minimum Standards, supra note 15.

<sup>92</sup> The primary documents guiding the quality implementation of this outcome area are the Inter-Agency Case Management Guidelines, supra note 17, and The GBV Minimum Standards, supra note 15.

<sup>93</sup> Supra note 69.

<sup>94</sup> Protection from Sexual Exploitation and Abuse (PSEA) is an institutional priority for which senior management at the country level has oversight and accountability. PSEA is also the responsibility of all colleagues, not exclusively a protection function, but rather a cross-cutting area of responsibility.

<sup>95</sup> Similarly, there is zero tolerance for any form of sexual misconduct.

<sup>96</sup> GBV is listed in Risk Category 3.3, Security from violence and exploitation (Annex A). Policy for Enterprise Risk Management in UNHCR, 2014, available from <https://cms.emergency.unhcr.org/documents/11982/45768/UNHCR,+Policy+for+Enterprise+Risk+Management/7f6a2f8f-cacc-4131-9b8d-1e003d0450c4>.

<sup>97</sup> Operations will select the applicable Policy Monitoring Framework i.e. for those covering day-to-day operational programming or for advocacy presence.

