

Guidance to DG ECHO partners - Yearly reporting on allegations of sexual exploitation, abuse and harassment (SEAH)

I. Introduction and regulatory framework

NEW

As a general principle, and irrespective of the context, DG ECHO applies zero-tolerance to inaction towards SEAH. This requires that all Participating Organisations have an appropriate system in place to properly manage incidents of SEAH, covering prevention, detection and response, while having a victim/survivor-centred approach. This also means that DG ECHO does not accept negligence regarding prevention, ignoring reports, covering up incidents, mishandling cases, retaliating against whistleblowers or victims/survivors or failing to take proportionate action against perpetrators.

As part of the EU Humanitarian Partnership Certificate, partners commit to ensure zero tolerance for SEAH.

Art. 5.3 of the Humanitarian Partnership Certificate (“the Certificate”) requires DG ECHO’s partners to submit an annual report on the implementation of their policy related to SEAH.

The purpose of this document is to provide guidance for the yearly reporting of SEAH allegations by DG ECHO Partners under the Certificate.

This guidance applies to allegations against affiliates (i.e. staff members, contractors, volunteers, etc.) of DG ECHO partners and their implementing partners and contractors (jointly called “Participating Organisations”) in which the victim/survivor is either a beneficiary of a DG ECHO grant or an affiliate, and which occur in the framework of the implementation of a DG ECHO grant.

This requirement of yearly reporting aims to uphold DG ECHO’s commitments as a donor, such as the Donor Commitments from the London Summit in 2018¹, and the OECD-DAC Recommendation² adopted in July 2019.

¹ Commitments made by donors to tackle sexual exploitation and abuse and sexual harassment in the international aid sector Introduction, strategic shift 1, point 4 “Ensure that relevant information about allegations, confirmed cases, prevention measures and response activities, are an integral part of reporting mechanisms, which for some donors will include annual public statements. The confidentiality of information and the safety of individuals will be paramount”.

² Recommendation on Ending Sexual Exploitation, Abuse, and Harassment in Development Co-operation and Humanitarian Assistance: Key Pillars of Prevention and Response, point 6.b “Improve data, including sex- and age-disaggregated data, qualitative and quantitative measures, and assessments and evaluations of agencies and partners’ initiatives that ensure confidentiality for survivors, victims and vulnerable groups. These efforts could include disaggregating data to be able to use it across organisations, locations, and time to learn and detect trends that would inform gaps in all the other areas”.

The Guidance is also in line with the IASC Six Core Principles Relating to Sexual Exploitation and Abuse.

II. Contents of the yearly reporting

Reporting table

NOTE: All questions, except for question A.2, refer to total figures irrespective of the country in which the allegation took place.

Reporting period	01.01.2024 – 31.12.2024
Partner	
Signatory of the Inter-Agency Misconduct Disclosure Scheme (MDS)?	[Y/N]
Member of CHS Alliance’s Harmonised Reporting Scheme?	[Y/N] NEW
<i>SECTION A: New SEAH allegations</i>	
A.1. Number of new SEAH allegations received³	
A.2. Number of new allegations per country (and/or HQ) NEW	[Country 1; No. of allegations towards beneficiaries; No. of allegations towards beneficiaries towards staff; No. of allegations in total if data in columns B and C are not available]
	[Country 2; No. of allegations towards beneficiaries; No. of allegations towards beneficiaries towards staff; No. of allegations in total if data in columns B and C are not available]
	[Country N; No. of allegations towards beneficiaries; No. of allegations towards beneficiaries towards staff; No. of allegations in total if data in columns B and C are not available]
	In person:

³ The figure reported shall include the cases individually reported to DG ECHO (see Section IV of this Guidance Note).

In the case of a consortium, reporting is done per partner, meaning that it is not for the lead partner to report, but for each partner of DG ECHO, and to coordinate with the lead partner to avoid duplications. When the implementing partner is also a DG ECHO partner, it has to report on the SEAH cases that have happened in the implementation of the grant, and inform the signatory of the ECHO grant that it has reported the case to ECHO. When the implementing partner is not an ECHO partner, it is for the signatory of the grant agreement with ECHO to report the case.

A.3. Number of new allegations per channel of reporting	Other (e.g.: phone, email):	
A.4. Number of new allegations per type of informer	Victim/survivor:	
	Staff of partner or implementing partner:	
	Anonymous/unknown:	
	Other:	
A.5. Number of new allegations per victim/survivor profile	Status NEW	Beneficiary:
		Subcontractor:
		Staff of partner or implementing partner:
		Volunteer:
		Other:
	Unknown:	
	Gender NEW	Male:
		Female:
		Other:
		Unknown:
	Age NEW	Adult:
		Child (under 18):
Unknown:		
A.6. Number of new allegations per affiliation and position of perpetrators / subjects of concern:	Affiliation NEW	ECHO Partner:
		ECHO Implementing Partner:
		Subcontractor ⁴ :
		Other:
		Unknown:
	Position NEW	Staff member (management):
		Staff member (non-management):
		Volunteer:
		Other:
		Unknown:
A.7. Number of new allegations per type of wrongdoing	Type of wrongdoing NEW	Sexual exploitation:
Sexual abuse:		
Sexual harassment:		
Unknown:		

⁴ In line with article 9.3 of the Model Grant Agreement.

SECTION B: Case management (new + carry-overs) ⁵	
<i>Carry-overs are in this context dismissals/investigations⁶ etc. in the reporting year, which refer to cases opened in the previous year(s).</i>	
<i>Please only report on SEAH cases in this section</i>	
B.1. Number of cases closed after preliminary review into the allegations (i.e. without investigation)	
B.2. Number of investigations launched	Launched by internal investigation teams:
	Launched by external investigation teams:
B.3. Number of investigations completed	Substantiated:
	Not substantiated due to insufficient evidence:
	Not substantiated for other reason:
	Unfounded:
B.4. Number of cases the organisation has reported to national or international authorities (when safe and appropriate)	
B.5. Number of cases brought to court	
B.6. Number of cases leading to precautionary/	Relocation of the alleged perpetrator ⁷ :
	Relocation of the victim/survivor:
	Temporary suspension of the alleged perpetrator:
	Limit access of the alleged perpetrator ⁸ :

⁵ Carry-overs refer to dismissals/investigations etc. in the reporting year, which refer to cases opened in the previous year(s).

⁶ Partners should interpret “investigations” in the same way they did for the relevant questions in Section 20 of the ex-ante assessment (“The Organisation has the capacity to investigate safeguarding issues in an independent and confidential way, while protecting both the alleged victim and the alleged perpetrator. If not, there are appropriate measures in place to follow-up on allegations” and “Investigation conclusions and recommendations are followed-up in a timely manner”).

⁷ Relocation would comprise not only physical relocation to another country or another office, but also relocation to another service of the same office – with a reorganisation of the organigram.

⁸ This could include: limiting access to some IT tools, or the server during the investigation, confiscation of computer, and others.

protective measures (temporary)	Other:
B.7. Number of cases leading to disciplinary sanctions	Verbal/written warning:
	Termination/summary dismissal:
	Detraction of benefits/temporary pay cut:
	Other:
B.8. Number of victims/survivors and families to whom the partner/implementing partner provided or facilitated support	Change of working arrangements:
	Medical assistance:
	Psycho-social assistance/ Counselling:
	Legal assistance:
	Financial assistance:
	Other:
<i>SECTION C: Other types of wrongdoing (not SEAH)</i>	
Number of other allegations received	Policy non-compliance and other unethical behaviours ⁹ :
<i>SECTION D: Prevention</i>	
The information provided in this section refer to all staff / newly engaged staff in the ECHO partner organisation, irrespective of their relationship with DG ECHO grants.	
D.1. a) Are criminal record checks a standard procedure when hiring new staff (only in countries where this is legally possible)? b) Are criminal record checks a standard procedure when engaging volunteers (only in countries where this is legally possible)? c) Are criminal record checks a standard procedure when engaging organisation representatives (only in countries where this is legally possible)?	[Y/N/To a certain extent/N.A.]

⁹ In line with article 4.9 of the EU Humanitarian Partnership Certificate.

<p>D.2.</p> <p>a) Is it compulsory for new staff to sign a Code of Conduct which includes PSEAH?</p> <p>b) Is it compulsory for new volunteers to sign a Code of Conduct which includes PSEAH?</p> <p>c) Is it compulsory for new organisation representatives to sign a Code of Conduct which includes PSEAH?</p>	<p>[Y/N/To a certain extent/N.A]</p>
<p>D.3.</p> <p>a) Has your organisation offered SEAH awareness raising activities for staff in the reporting year?</p> <p>b) Has your organisation offered SEAH awareness raising activities for volunteers in the reporting year?</p> <p>c) Has your organisation offered SEAH awareness raising activities for organisation representatives in the reporting year?</p>	<p>[Y/N To a certain extent/N.A]</p>

COMPLEMENTARY INFORMATION¹⁰

Question 1: Is there anything else you would like to share? (e.g.: on your PSEAH policies and procedures or particular developments you observed in your operations?)

Question 2: If you are not a signatory of the MDS, what are the reasons for not signing?

¹⁰ It is not compulsory to fill this part.

Question 3: How do you assess the PSEAH systems of your implementing partners? Do you provide any capacity building, especially to local partners? Do you see any challenges?

III. Timing for the yearly reporting

Partners should submit their yearly report by email to ECHO REPORT MISCONDUCT (ECHO-REPORTMISCONDUCT@ec.europa.eu), by 30 April every year, covering the year N-1.

Partners who received DG ECHO's funding in 2024 are requested to submit the yearly report by 30 April 2025, covering the year 2024.

Partners who did not receive DG ECHO's funding in 2024, are requested to submit only Section D "Prevention" of the report.

IV. Reporting of individual allegations of SEAH

Based on their own assessment, partners are requested to continue informing DG ECHO, separately and upon becoming aware of, allegations that cannot be considered an isolated case and/or that might entail a high reputational risk. Such allegations go beyond the fact that they are related to a DG ECHO grant, and can include (non-exhaustive list):

- A high number of victims by the same perpetrator(s);
- A high political profile of the perpetrator(s);
- The absence of a timely detection/reporting system that allowed the perpetrator(s) to act with impunity for a certain period of time;
- The negligence in the management of allegations that allowed the perpetrator(s) to act with impunity for a certain period of time;
- Any case that is likely to draw public attention or that is already covered by the media;
- Allegations that the partner assesses as particularly egregious;
- Incidents involving extremely vulnerable victims/survivors (e.g. children or persons with disabilities). As an exception, in this case DG ECHO would like to be notified only if the cases are related to DG ECHO grants.

In case of doubts, DG ECHO encourages partners to contact ECHO REPORT MISCONDUCT (ECHO-REPORTMISCONDUCT@ec.europa.eu) for guidance on individual cases.

V. Use of information received

Only high-level, non-sensitive, non-identifiable, non-traceable to individuals or partners data may be shared in an aggregated manner for data gathering purposes, to allow analysis of trends and evolution in the sector.

Any information at individual partner level, would be disseminated only on a very strict need-to-know basis, always duly ensuring confidentiality, protection of the source and

victims/survivors, including their personal data, and presumption of innocence of alleged perpetrators.

FAQs

Frequently asked questions and questions of general interest on this Guidance and related topics will be published in a dedicated section of the DG ECHO Partners' website (<https://www.dgecho-partners-helpdesk.eu/>).

For any additional question or clarification, please contact ECHO REPORT MISCONDUCT (ECHO-REPORTMISCONDUCT@ec.europa.eu).

ANNEX I: SEAH articles in Certificate 2021

4.9 The organisation undertakes to comply with the following minimum standards for the preparation and implementation of humanitarian actions (...): ensure ‘zero tolerance’ for sexual exploitation, sexual abuse, sexual harassment, physical abuse and other forms of misconduct through effective and coordinated prevention, reporting and response mechanisms (in line in particular with the United Nations Inter-Agency Standing Committee’s Six Core Principles Relating to sexual exploitation and abuse).

(...)

5. Ensure transparency and accountability, compliance with applicable rules, policies and procedures, and internal control, through notably:

5.1. Procurement procedures, which ensure best value for money (or if appropriate the lowest price) and the absence of conflict of interests, as well as compliance with high level quality standards, in particular for medical supplies;

5.2. An effective and efficient internal control system for the management of actions (which includes effective segregation of duties and appropriate risk management mechanisms, identifying risks and appropriate risk responses);

5.3. An annual reporting to the Commission on the implementation of its policy related to sexual exploitation, abuse, harassment and other types of unethical behaviour in accordance with the applicable Commission guidance;

ANNEX II: General definitions

Sexual exploitation

“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.”¹¹

It is a broad term, but it includes transactional sex, solicitation of transactional sex and exploitative relationships.

Sexual abuse

“The term “sexual abuse” means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.”¹²

All sexual activity with children (as defined under the UN Convention on the Rights of the Child as any person under the age of 18) is sexual abuse, regardless of the age of majority or consent locally. Mistaken understanding of the age of a child is not a defence. “Sexual abuse” is a broad term, which includes a number of acts, including “sexual assault” for example, (rape, attempted rape, forcing someone to perform oral sex / touching) “sexual offence” and “sexual offence against a child”.

NEW

Sexual harassment

The term “sexual harassment” means any form of verbal, non-verbal or physical conduct relating to sex which is unwanted by the person to whom it is directed and which has the purpose or effect of offending that person or creating an intimidating, hostile, offensive or disturbing environment.

It includes a range of unacceptable and unwelcome behaviours and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, sexual, verbal or physical conduct, or gestures that are or might reasonably be perceived as offensive or humiliating. This includes jokes, comments or messages of a sexual nature; suggestive looks, staring or leering; display of or circulation of pornographic material.

While typically involving a pattern of conduct, sexual harassment may take the form of a single incident.

¹¹ UN Secretary-General’s Bulletin on protection from sexual exploitation and abuse (PSEA) (ST/SGB/2003/13).

¹² UN Secretary-General’s Bulletin on protection from sexual exploitation and abuse (PSEA) (ST/SGB/2003/13).