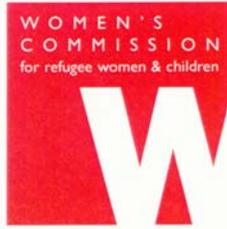




**BREAKING THE CODE:  
Building Capacity to Investigate Sexual Abuse  
and Exploitation by Humanitarian Workers**  
Evaluating ICVA's Building Safer Organizations Project

a report by the  
Women's Commission  
for Refugee Women and Children

June 2006



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**“With any code, there will be code breakers.”**  
Jane Warburton, International Rescue Committee

#### **ACKNOWLEDGEMENTS**

- Heartfelt thanks to the 60 course participants and 20 others from ICVA, IRC, HAP-I, SCHR, MSF-H, Keeping Children Safe, UNICEF, UNHCR and other organizations, who offered insights into Building Safer Organizations (BSO) program impacts, other initiative complements and their recommendations for BSO next steps.
- Sincere appreciation to several BSO participants for sharing how they intend to use BSO information to transform national policies and improve local protection of individuals vulnerable to sexual abuse and exploitation. As the evaluator of this project, I found these perspectives humbling and inspiring.
- It has been an enormous pleasure to work with Katharina Samara-Wickrama and Coleen Heemskerck from the ICVA/Building Safer Organizations project. Additionally, I would like to thank Dale Buscher, Director of the Protection and Participation Program at the Women's Commission. His supervision has been a valuable blend of support and constructive criticism.
- This evaluation was funded by the BSO project donors through the International Council of Voluntary Agencies (ICVA).

This report was written by Kirsti Lattu and edited by Dale Buscher and Diana Quick of the Women's Commission for Refugee Women and Children.

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## Acronyms

ADRA	Adventist Development and Relief Agency
ADSO	Afghan Development and Social Organization
AACC	All Africa Conference of Churches
AMERA	African and Middle East Refugee Assistance
ANCB	Afghan NGOs Coordination Bureau
APA	Afghan Planning Agency
ANPPCAN	African Network for the Prevention and Protection against Child Abuse and Neglect
ARTES	African Refugee Training and Employment Services
BSO	Building Safer Organizations Project
COERR	Catholic Office for Emergency Relief and Refugees
COC	Code of Conduct
GTZ	Deutsche Gesellschaft für Technische Zusammenarbeit
HAP-I	Humanitarian Accountability Project-International
HAFO	Helping Afghan Farmers Organization
IASC	Inter-Agency Standing Committee
ICVA	International Council of Voluntary Agencies
IMC	International Medical Corps
IOM	International Organization on Migration
IRC	International Rescue Committee
JRS	Jesuit Refugee Service
JVA	Joint Voluntary Agency
LWF	Lutheran World Federation
NCKK	National Council of Churches in Kenya
NNGOC	National NGO Council of Sri Lanka
NSPCC	National Society for the Prevention of Cruelty to Children
OFADDEC	Office Africain Pour le Developpment et la Cooperation
NGO	nongovernmental organization
SG's Bulletin	UN Secretary General's Bulletin for Protection from Sexual Exploitation and Sexual Abuse (ST/SGB/2003/13)
SEA	Sexual abuse and exploitation
SCHR	Steering Committee for Humanitarian Response
TBBC	Thai Burma Border Consortium
UN	United Nations
UNHCR	United Nations High Commission for Refugees
WARIPNET	West African NGO for Refugees and IDP Network
Women's Commission	Women's Commission for Refugee Women and Children
WVI	World Vision International

## Executive Summary

Following reports of sexual exploitation of refugees in West Africa in 2001 and in Nepal in 2003, the UN Secretary General issued a Bulletin in October 2003 obliging UN agencies and their nongovernmental partners to prevent, and when suspected, to investigate any sexual exploitation and sexual abuse (SEA) by humanitarian staff. Humanitarian organizations, galvanized by the reports of refugee abuse, began adopting and revising Codes of Conduct and other related policies.

The Building Safer Organizations (BSO) project is an important collaborative effort by nongovernmental organizations (NGOs) to address the problem of SEA. The BSO project strengthens NGOs' capacity to receive and investigate allegations of sexual exploitation and abuse brought by persons of concern – including refugees, displaced persons and local host populations. To achieve this, BSO, which is housed by the International Council of Voluntary Agencies (ICVA) in Geneva, developed learning materials and field-based trainings. In March 2005 it began pilot skills-building trainings.

Following the pilot trainings, ICVA invited the Women's Commission for Refugee Women and Children to undertake an evaluation of the program, the results of which are contained in this report.

### Key Findings

**In less than 18 months, the BSO learning program has proven a valuable tool for humanitarian agencies in strengthening their capacity to receive and investigate allegations of sexual exploitation and abuse of beneficiaries by staff.**

**BSO learning program materials are effective and well received.** BSO modules are user friendly as evidenced by the more than 50 percent of evaluation respondents who have drawn from them to offer trainings for colleagues, partner organizations, local police and other diverse audiences. BSO success is amplified by other participants who are changing program and policy variables to improve SEA prevention and response efforts.

**Although reports of sexual exploitation and abuse of beneficiaries by humanitarian staff are rare, 10 evaluation participants have utilized their BSO learned investigation skills.** In preparing for and conducting investigations, all referred back to BSO materials, including key international reference documents. Satisfactory investigation outcomes were attributed to adequate preparation, use of clear investigation protocols and prompt investigation following receipt of an allegation.

**The participation by staff from 43 humanitarian organizations in BSO is slowly advancing a common understanding and approach to investigating humanitarian worker sexual exploitation and abuse of beneficiaries.**

**BSO evaluation participants cited the ineffectiveness or absence of complaints mechanisms as a leading obstacle to receiving sexual exploitation and abuse allegations.** Investigations will only be effective in addressing SEA if beneficiaries are able to put forward allegations to humanitarian agencies.

**Longer-term planning by humanitarian organizations is critical to ensure that BSO learning program elements remain available and accessible for the longer term and to avoid having to reinvent the wheel in the future.** It is not reasonable to expect that prevention efforts will halt all sexual exploitation and abuse. It is not realistic to anticipate that NGO capacity for investigation and response will be fully realized within the final 18 months of the BSO learning program.

## Introduction

Following reports of sexual exploitation of refugees in West Africa in 2001 and in Nepal in 2003,<sup>1</sup> the UN Secretary General issued a Bulletin<sup>2</sup> obliging UN agencies and their partners to prevent, and when suspected, to investigate any sexual exploitation and sexual abuse (SEA) by humanitarian staff. Humanitarian organizations, galvanized by the reports of refugee abuse, began adopting and revising Codes of Conduct and other related policies.

A broader inter-agency response was the development of the Building Safer Organizations (BSO) project. Housed at ICVA,<sup>3</sup> BSO is a series of investigation and management trainings for humanitarian organization staff to help them address SEA of beneficiaries.

Jane Warburton of the International Rescue Committee (IRC), who designed the ICVA/Building Safer Organizations (BSO) project, summarized the ongoing need for an appropriate response to allegations of sexual exploitation and abuse, “With any code [of Conduct], there will be code breakers.”

The Women’s Commission for Refugee Women and Children conducted an evaluation of the ICVA/BSO pilot project between January and April 2006.

This evaluation is a critical component underpinning the larger SEA prevention and response equation as the humanitarian community makes efforts to decrease staff sexual exploitation and abuse of beneficiaries. Currently BSO is the sole resource offering investigation and reporting training available to the NGO community.

This forward-looking evaluation explores the impact of the BSO pilot project to support humanitarian organizations’ efforts to build capacity to receive and investigate allegations of sexual abuse- or exploitation-related staff misconduct. Recommendations drawing from current BSO project progress are offered as BSO launches into a second and final 18-month phase of the learning program.

## ICVA’s Building Safer Organizations Learning Program— What Did This Pilot Program Set Out to Do?

Through field-based trainings, sharing of information and ongoing discussion, the Building Safer Organizations project strengthens NGO capacity to receive and

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<sup>1</sup> For background information on these two events, refer to: (1) [Trapped by Inequality: Bhutanese Refugee Women in Nepal](#). Human Rights Watch. September 24, 2003 and (2) “Note for Implementing and Operational Partners by UNHCR and Save the Children-UK on Sexual Violence and Exploitation: The Experience of Refugee Children in Guinea, Liberia and Sierra Leone based on Initial Findings and Recommendations from Assessment Mission 22 October-30 November 2001.” February, 2002.

<sup>2</sup> UN Secretary General’s Bulletin for Protection from Sexual Exploitation and Sexual Abuse (ST/SGB2003/13) <http://ochaonline.un.org/GetBin.asp?DocID=1083>

<sup>3</sup> Centralization potentially discourages duplication of efforts to create investigation training materials, guidelines and other-related materials by individual humanitarian actors.

investigate allegations of sexual exploitation and abuse brought by persons of concern—including refugees, displaced persons and local host populations. After initial training materials were developed and refined, BSO began skills building trainings in March 2005. Specific BSO project objectives include:

- Building skills and knowledge for those staff who will be assigned to conduct internal investigations into SAE allegations against staff;
- Promoting a common understanding, approach and investigation standard based on the UN SG’s Bulletin and the Inter-Agency Steering Committee’s (IASC) Model Complaints and Investigations Procedures and Guidance Related to Sexual Abuse and Exploitation;
- Sensitizing agency managers to the issue and their role in reducing the incidence and risk of abuse and exploitation by staff.

Building upon existing training materials,<sup>4</sup> since March 2005 BSO has piloted 10 participatory workshops targeted to NGO staff designated as potential investigators, NGO senior management, NGO resource persons and UN and NGO Sexual Exploitation or Abuse (SEA) focal points. A total of 137 NGO staff participated in the BSO Management or Investigation workshops. Of the 79 participants who completed the Investigation workshop, 56 (70 percent) were invited back and 27 were able to attend the Investigations Follow-up workshop. Sixty completed the Management workshop.

INVESTIGATION WORKSHOP	Content focuses on building skills for NGO staff designated to conduct investigations into allegations of sexual exploitation and abuse by staff.	5 days long -79 participants Completed -5 workshops staged
MANAGEMENT WORKSHOP	Covers management issues related to the risks and range of implications of enforcing Codes of Conduct and compliance with the six principles outlined in the UN Secretary General’s Bulletin for Protection from Sexual Exploitation and Sexual Abuse (ST/SGB2003/13). Provides practical training for managing an investigation. Direct investigation skills are not covered in this workshop.	2 days long - 60 participants completed -3 workshops staged
FOLLOW-UP INVESTIGATION WORKSHOP	Further extends skills built in the Investigation Workshop. Offered to selected participants who have shown an aptitude for and quick uptake of investigation-related skills during the Investigation Workshop.	3 days long - 27 participants completed -2 workshops staged

<sup>4</sup> Some of the original training materials were drafted by the British NGO, the National Society for the Prevention of Cruelty to Children (NSPCC) drawing directly from the Inter-Agency Standing Committee (IASC) Task Force on Protection from Sexual Exploitation and Abuse in Humanitarian Crises’ draft Model Complaints and Investigation Procedures and Guidance Related to Sexual Abuse and Exploitation. Review and feedback came from an editorial advisory board, including the Keeping Children Safe Initiative, a representative from InterAction’s Protection Working Group, humanitarian community members and others.

	LOCATION/ DATE # PARTICIPANTS	LOCATION/ DATE # PARTICIPANTS	LOCATION/ DATE # PARTICIPANTS	LOCATION/ DATE # PARTICIPANTS	IDEAL NUMBER OF PARTICIPAN TS
INVESTIGATION WORKSHOPS	Bangkok March 2005 16	Dakar May 2005 18	Cairo June 2005 16	Nairobi++ April 2005 32	18
MANAGEMENT WORKSHOPS	Bangkok October 2005 12	N/A	Cairo November 2005 21	Nairobi January 2006 32	25
FOLLOW-UP INVESTIGATION WORKSHOPS	Bangkok October 2005 Cancelled*	N/A	Cairo November 2005 15	Nairobi January 2006 12	10-15

\* Participant attrition due to Pakistan Earthquake response efforts resulted in cancellation of this workshop

++ Split into two investigation workshops

For those completing both Investigation and the Follow-up workshops, receiving a certificate does not equate certification. Investigation and Follow-up workshop participants return to their positions with investigation fundamentals and a clear understanding that an investigator is neither judge nor jury, but an impartial evidence gatherer. Practice and, where possible, mentoring, enhance BSO participants in effectively applying learned skills. BSO's larger goal as a learning program is promoting a common investigation standard across all humanitarian organizations.

BSO course materials are currently available in English.<sup>5</sup> Materials in French will be available in June 2006, followed by the availability of Arabic versions by August 2006. A roster of BSO-trained NGO staff to assist or advise on investigation procedures has also been compiled. A handbook, which further operationalizes the Inter-Agency Standing Committee (IASC) Task Force on Protection from Sexual Exploitation and Abuse in Humanitarian Crises *Model Complaints and Investigation Procedures and Guidance Related to Sexual Abuse and Exploitation*, is currently in production.<sup>6</sup> This impact evaluation is the final product of BSO's first 18 months as a pilot learning program.

### **BSO Evaluation Process**

Under the auspices of the Women's Commission for Refugee Women and Children, the ICVA/BSO pilot project evaluation was conducted between January and April 2006. To measure BSO's impact both for individuals and their organizations, this evaluation seeks to answer the following questions:

- Do participants and participating organizations value the BSO learning program?
- What did participants learn?
- In what ways do participants apply their learnings?
- What barriers and obstacles hold them back? What other initiatives are afoot and how do these affect BSO's impact?

*See Illustrative list of questions in Appendix 2.*

<sup>5</sup> The training materials are available on the ICVA website members' section at [www.icva.ch](http://www.icva.ch).

<sup>6</sup> The Handbook will be available in English by May 2006. French and Arabic translations are expected several months later.

Evaluation participant comments are confidential and unattributed except where permission has been granted. These findings draw out participant reflections about obstacles blocking investigations and existing needs within their organizations to realize reporting protocols and investigations. Responses elicited overwhelmingly positive feedback for the BSO Learning Program. However, in order to highlight challenges and opportunities for BSO's next steps, reported evaluation findings tend to emphasize criticisms rather than praise.

Sixty of 137 BSO workshop participants, representing 43 organizations, participated in the evaluation. Additionally, 20 non-BSO participants—which include NGO senior managers, BSO advisors and course facilitators, ICVA's Director and two ICVA board members, one donor and other key informants from parallel and intersecting initiatives—shared their BSO pilot project reflections and suggestions towards next steps. *See Evaluation participant contact list in Appendix I.*

Of 137 BSO learning program participants, 60 participated in this evaluation. Of the 60, 32 were interviewed and 28 responded to questions by email. For the 77 who did not participate:

- 15 were on maternity/study leave, had a death in the family or were out sick for an extended period.
- 12 appear to have moved on from the position they held when participating in the BSO workshop(s) and their email bounced back to sender.
- Of the remaining 50 BSO participants, no information was received from them or their organizations.

## How the Evaluation Was Conducted

1. Document review, including: BSO and SEA background documents; participant applications; pre-test homework responses; course announcements; BSO progress reports generated for ICVA and BSO donors; and post-workshop session participant evaluations.
2. Training delivery review and Management and Follow-up BSO workshop attendance (Nairobi workshops, January 2006).
3. Questionnaires and interviews tailored for different categories of ICVA/BSO participants in addition to NGO supervisors, senior management for NGOs and non-participant key informants who were approached:
  - i. Participants who have conducted an investigation
  - ii. Participants who completed Investigation and follow-up training
  - iii. Participants who completed Investigation training
  - iv. Participants who completed the Management training
  - v. Participants who completed at least two, or all three, workshops
  - vi. Supervisors of participants who have completed Investigation and follow-up training and senior level staff (Director, VP) for NGOs that sent four or more staff to BSO workshops

- vii. Interviews with BSO course facilitators; BSO advisors, ICVA board members and other interested individuals from SEA-related or intersecting initiatives such as the Humanitarian Accountability Project International (HAP-I); Keeping Children Safe Initiative; Steering Committee for Humanitarian Response (SCHR); and others.
4. Contacts with all participants involved interviews in person, by phone or responses to standardized questions via email.
5. Identification of parallel and intersecting initiatives that might affect (enhance, contradict or complement) BSO impact.

Before exploring key findings, it is helpful to note that the ICVA/BSO workshops only commenced in March 2005. Thirty-one managers attended a BSO learning program as recently as January 2006. Although the evaluation timing is early in terms of measuring change and impact for these participants and their organizations, the short timeframe does not diminish findings about skills learned, changed attitudes or BSO training format impressions. Within the scope, budget and timeframe for this evaluation, it was not possible to directly interview refugees, internally displaced persons (IDPs) or host community persons of concern served by BSO humanitarian agency participants. Using investigators as proxies, questions have been asked about beneficiaries' fears in reporting alleged abuse, access to complaints mechanisms and reasons for not reporting.

**NOTE: In reporting BSO evaluation results, “participant” specifically refers to one of the 60 BSO participants who responded to this evaluation.**

## **What Do We Know About This Pilot? (Reporting Evaluation Results)**

### **A. Training Format and Participation**

#### **1. BSO Learning Program Training Format and Methodology**

BSO bills itself as a learning program. This encompasses pre-training, training and post-training participant engagement and support. As a pilot, learning program materials continuously evolved based on participant, co-facilitator/advisor and external feedback which were accumulated by staging 10 field-based trainings. In reviewing course evaluations, the majority of participant concerns from early trainings do not re-emerge in later trainings.

Pre-workshop learning is prompted by exercises to familiarize participants with SEA concepts and the key documents, and asks them to identify SEA-related policies and procedures within their organizations prior to attendance. This “homework” is reviewed and feedback offered. Depending on the workshop attended, 53 - 91 percent of

participants completed and submitted their homework for review before attending the course.<sup>7</sup>

While observing the Management and Investigator Follow-up training workshops, the evaluator noted that BSO trainers skillfully employed adult education techniques. Participants were engaged in discussions, quizzes, gallery walks, videos and through challenging role plays using local actors for investigation interviews. The workshops were lively, interactive and highly conducive to participatory learning from the facilitators, as well as from other participants. Participants reported finding BSO learning programs to be of a very high standard. They credited this overall impression to pre-course work and assigned readings, well-facilitated workshop sessions packed with participatory exercises and BSO staff availability for questions after their workshop participation. Participants greatly valued “real life” investigation examples offered by the BSO facilitators. These examples were drawn from their professional investigator experiences. With very few exceptions, participants reported a high degree of satisfaction with the course format and resulting learning.

BSO modules are user friendly as evidenced by the more than 50 percent of evaluation respondents who have drawn from them to offer trainings for colleagues, partner organizations, local police and other diverse audiences. Roughly 80 percent of respondents report having referred back to their training materials, particularly the Secretary General's bulletin, in preparing trainings and staff handbooks, when reviewing policy documents or when preparing for an investigation. Final materials for the Management and Investigation workshops are a tight product. Most reported finding the Follow-up workshop useful as a refresher (20 responses out of 27 workshop attendees) in reinforcing their investigation skills. A few (3 out of 20 responses) thought the module was repetitive and desired new learning in addition to the skills refresher. Two were unclear about the Follow-up workshop intent and emerged with unrealized expectations.

## 2. Participation

- 137 participants from 43 organizations participated in one or more of the 10 BSO workshops.
- 25 participated in more than one workshop; 2 of these participated in three workshops.
- Of the 137, 65% were women and 74% were locally recruited staff from INGOs or local organizations.

*See Appendices III and IV for more information on organizational representation and participant positions held when applying for BSO workshops.*

Based on interviews and emailed responses, most BSO attendees fit within three general categories: 1) Participants sent by their organizations to test out the training for quality and value; 2) Participants who self-selected or were sent with no organizational intentions beyond participation in the BSO pilot; and 3) Investigators or designated

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<sup>7</sup> This does not capture participants who completed their homework but did not submit it or those who partially completed the assignments.

investigators with highly relevant field experience or professional positions, whom their organizations intended to utilize.

### 3. Participant Selection

Participation selection criteria included agency commitment to utilize BSO-taught skills, ensuring an enabling environment for BSO-trained staff to conduct investigations, and ability to fund staff travel to the course location.<sup>8</sup> Participating organizations were asked to consider diversity, English language skills and, especially in the case of the Investigation workshop, to send staff who would be expected to conduct investigations. The pool of applications was further winnowed based on relevant experience and motivation. BSO workshops targeted NGO staff designated as potential investigators; NGO senior management; NGO resource persons; and UN and NGO Sexual Exploitation or Abuse (SEA) focal points. Of 60 respondents, more than 12 (20 percent) sit clearly within the complaints receiving or reporting structures created by their NGOs. A large minority of the selected participants were highly qualified, motivated and are now changing program variables to improve prevention and response efforts around alleged SEA by staff. A small minority report changing policies to facilitate SEA reporting or investigations. Others are on the periphery (20 percent of respondents) and are not sure what their role would be in terms of investigations/managing investigations—or if they would be involved at all.

One SEA program manager, who attended the Management training, voiced the concern that participants were at different levels in their experience in thinking about SEA. He acknowledged the utility of discussions in mixed audiences but regretted the tradeoff that those at a more “advanced” level with a desire to “go deeper” sacrificed improving their own knowledge to hear opinions from less experienced participants.<sup>9</sup>

► *BSO project managers might consider ways to create time for more advanced participants to delve more deeply into investigation-related issues. This might include dividing several course sections into advanced and novice groups. Alternatively, it might include hosting an evening or lunch roundtable session specifically for advanced participants.*

In the BSO project’s first 18 months, workshops were presented as a pilot program. As a result, several ICVA member organizations declined to participate—preferring instead to defer their participation until BSO program elements were finalized. Other NGOs nominated a haphazard mix of participants to go and test out BSO workshops. Given scarce staff, resources and time, one ICVA member NGO focused efforts to first build complaints mechanisms with the future intention of drawing upon BSO investigation skills training. Recent oversubscription may create BSO leverage in encouraging organizations to more carefully select BSO candidates, thereby decreasing participation of those who are ill-positioned to share or apply BSO learning. Key to this will be

<sup>8</sup> Organizational and participant criteria at <http://www.icva.ch/cgi-bin/browse.pl?doc=doc00001311>. Some funding was available to fund NGO staff travel and decisions were made on a case-by-case basis.

<sup>9</sup> Perhaps there could be future training accommodation for the more advanced participants.

involving organizations to strategically choose BSO participants and commit to post-BSO learning program opportunities to use learned skills.

#### **4. Promotion**

BSO learning program workshop dates and other news reached a remarkably wide audience but with scattered effect. Primarily BSO was introduced through ICVA's website and via emails to member organizations. Correspondingly, the vast majority of participants reported that their BSO learning program information originated with ICVA. Word of the ICVA/BSO learning program was also passed through participants' country directors; NGO headquarters; the World Council of Churches networks; national or regional NGO networks; through country-level NGO fora; or peer to peer. One NGO sent seven strategically selected participants to the Management training, but had zero participation in the Investigation training. They had not heard about it. One NGO staff member commented she would have been better placed taking the Management rather than the Investigation training but had not heard of the other option. Some individual participants reported last minute notice of the training—which in several cases was due to late designation of staff attendees by their managers.

Commensurate with its success, BSO has gained in reputation. New demands of BSO include workshops run for individual NGOs and requests for workshops in new regions, such as Eastern Europe or the newly independent states.

#### ***BSO PARTICIPANT SELECTION AND PROMOTION SUGGESTIONS:***

- Work through InterAction, ICVA, UNHCR and donors to encourage organizational nomination of appropriate candidates in order to avoid using this valuable resource as a reward for hard-working, albeit less appropriate, staff members.
- Solicit NGOs to nominate staff who will be expected to employ the skills attained.<sup>10</sup>
- For future trainings, ask participants to work with their supervisors to make a simple plan outlining how they will use or share BSO skills and knowledge within their organizations. Ask participants to report on progress.
- Circulate names of participants trained to their organizations.
- Target more senior manager participation.
- Examples of late notice, short visa time frames, etc., highlight the need to get information of trainings or other BSO learning program opportunities out early, through multiple channels. However, given the remote, difficult access areas where some participants work and their diverse nationalities it will not be possible to overcome all such challenges.

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<sup>10</sup> Encourage incorporation of related activities within their job responsibilities in order to facilitate organizational performance monitoring and feedback. Only a small minority of evaluation participants noted that their SEA-related activities were reflected within either their job description or performance evaluation.

## B Impact for Participants and Organizations

### 1. What Participants Learned

Highlights of a few reported changes following participation in the BSO learning program:

<b>INCREASED AWARENESS</b>	<b>CHANGED KNOWLEDGE</b>	<b>NEW SKILLS</b>
<ul style="list-style-type: none"> <li>- Thought many allegations were malicious rumors but now will take them more seriously</li> <li>- Nearly 25% reported no change in their own SEA awareness due to current SEA issue immersion through job-related activities—but found the many grey areas in other participants’ interpretation of SEA during group discussions to be eye-opening.</li> <li>- Increased awareness of risk and vulnerability and SEA potential occurrence.</li> <li>-The cost of doing investigations using clear procedures will be much less than that of investigations done badly.</li> <li>- Much more aware of individual bias due to religion, culture and also our very human tendency to jump to conclusions when someone is alleged to be “guilty.”</li> <li>- Decision taken to report suspicions, rumors, allegations and to be a role model for others.</li> </ul>	<ul style="list-style-type: none"> <li>- Referring back to the SG’s Bulletin to determine whether SEA has occurred as a definitive resource document.</li> <li>- Based on the SG’s Bulletin, now intolerant of relationships that were once seen as “normal.”</li> <li>- Learning about and explaining the investigation manager’s role to (her) manager.</li> <li>- Expanded definition of SEA—formerly focused on grievous physical abuse or rape, but now concerned about preventing more subtle forms of SEA.</li> </ul>	<p>Investigation procedures:</p> <ul style="list-style-type: none"> <li>- Investigation report writing</li> <li>- Planning and steps for conducting an investigation</li> <li>- Interviewing skills</li> <li>- Understanding and practicing types of questions (open-ended, closed and leading questions) used during interviews</li> <li>- Practice in confronting people—walking line between politeness and aggressiveness to elicit information</li> <li>- Considering facts at hand in an objective manner</li> <li>- How to maintain distance and objectivity due to clear role as fact gatherer</li> <li>- Approach subject of complaint last after other evidence is gathered.</li> <li>- Using materials shared in BSO workshop, to determine missing underpinning components and where gaps occurred, to reinforce efforts to get policies and procedures in place to prevent SEA.</li> </ul>

## 2. Application of Learning

The original impetus behind the BSO pilot was to assist NGOs to build skills and knowledge for staff who would conduct investigations into SEA allegations against other staff members. Although relatively few BSO participant respondents have conducted or managed investigations,<sup>11</sup> their reflections provide significant insight into BSO program impact.

### *i. Investigations Experience*

Of the 60 participant respondents, 10 had staff misconduct investigation experience prior to attending a BSO training. Ten participants conducted investigations after the BSO training(s).<sup>12</sup> Of these ten, nine reported their post-training investigation experiences involved one to three cases and one participant estimated being involved with eight cases. One case resulted in a joint investigation conducted in a refugee camp setting involving two NGOs and UNHCR as investigators.<sup>13</sup> Two allegations, when investigated, discovered non-SEA staff impropriety. NGO investigators reported finding BSO reference materials equally applicable in conducting these two investigations. Over all, respondents report being satisfied with their role and the outcome of the investigations after BSO training. Advantages attributed to having investigation skills are quick response time from complaint receipt and following a clear investigation protocol. Towards this end, the BSO training was described as “highly relevant.” All 10 reported referring back to BSO materials when starting their investigation planning. Several asked BSO staff for other materials and quick advice. With one exception, participation by the 10 participants in investigations was described as “professional” in that investigations were clearly planned and impartially conducted and findings were reported to managers for action. Exceptions to this involved variables such as lack of manager support and discomfort with investigating a direct colleague. Eight were satisfied with support from their organization received during the investigation.

A respondent not included in the 10 above provided long-distance telephone support to a field-based colleague conducting an investigation.<sup>14</sup> Concerns about the actual quality of the investigation revolved around the stop-start nature of interviews which may have undermined witness or complainant confidence in the overall investigation.

The few respondents with both pre- and post-BSO investigation experiences reported a world of positive difference as a result of the BSO training. This was credited to improved timeliness; clear communication of investigation-related support needs to managers; pre-investigation planning; and impartiality. Many who participated in the Investigation training expressed a desire for investigation experience mentoring during the investigation process to continue to build their skills. Several expressed interest in having a safe place or person to turn to with specific investigation-related questions that

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<sup>11</sup> Most NGO staff participating in this evaluation reported that receiving SEA allegations is a relatively rare event.

<sup>12</sup> A BSO program advisor also reported using BSO investigation planning tools for a current case and is not included in the 10.

<sup>13</sup> Interactions with UNHCR on investigation cases varied widely in this small sample of NGO investigation efforts. One participant reported on an investigation that was scuttled by UNHCR.

<sup>14</sup> This case highlights that to be timely, sometimes NGO have to “make do” with whatever resources are available to them. The field investigator had participated in the Investigation training but was not invited back for Follow-up training.

would not compromise confidentiality. Related to this, two senior managers reported having headquarters-based staff available to respond to SEA-related staff investigation queries.<sup>15</sup>

### ***ii. All BSO Evaluation Participants—Applied Learning***

Many (approximately 80 percent) evaluation respondents reported using BSO-related learnings to conduct the following sorts of activities:

- Spending more time in the field proactively identifying areas of unaddressed risk and vulnerability;
- Sharing information with direct colleagues through staff meetings and workshops;
- Conducting informal one-on-one or small group sessions with colleagues and refugee camp leaders using BSO modules to encourage SEA-related opinion exchange;
- Revising policy documents, such as explicitly stating SEA-related staff expectations within employee manuals;
- Increasing SEA awareness activities for program beneficiaries and modifying the human resource policies to strengthen sexual harassment sections;
- Including SEA-related activities in annual workplans to secure necessary budgetary support;
- Replicating most or parts of the Investigation training for other field-based colleagues;
- A senior human resources manager reported sharing BSO Manager Workshop materials with all 31 country directors as a desk reference for them in the event that they would need an immediate resource.

Interestingly, the majority of activities stimulated by participation in BSO workshop are prevention oriented. Learning more about how to conduct or manage investigations fostered significant motivation to prevent behavior that might lead to SEA allegations. As an illustration, one regional human resources manager's NGO employs 295 staff of 18 different nationalities and 2,550 incentive workers. As a direct result of involvement in the BSO learning program, the manager renewed efforts (in 2005) to increase staff awareness and understanding of SEA-related clauses in their employment contracts. That manager's 2006 workplan includes development of complaints mechanisms and reporting protocols.

BSO's success is amplified by the astounding 80 percent of participants who reported using skills learned to conduct trainings, investigations or make use of their BSO-learned skills within a myriad of other activities. However, it is important to note that more than 20 percent of respondents expressed frustration at not yet applying new skills or knowledge within their workplace setting. Of this 20 percent, many did not feel well positioned or supported to apply their BSO-related learning. The majority of these appear to be poorly selected staff representatives sent to participate in an interesting-sounding and admission-free training.

### ***iii. Requests for Additional Learning***

In hindsight, participants offered the following areas in which they would like to receive more information, support or opportunities to learn—whether from BSO or another

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<sup>15</sup> The two NGOs are IRC and Terre des Hommes.

source. They are listed in priority order, weighted by the number of mentions by different individuals.

- Sharing of information with other organizations on complaints mechanisms;
- Using more “real” SEA case<sup>16</sup> examples and specific information on patterns of abuse and exploitation;
- Maintaining confidentiality and managing community perceptions without compromising confidentiality;
- Providing concrete examples of how NGOs are creating safe environments, as explicitly mentioned in the Secretary General’s Bulletin;
- Creating good reporting systems while retaining confidentiality and using past investigation records as a learning tool for improving performance;
- Sharing more information on how to support SEA victims;
- Conducting investigations where local ministry officials or other local partners are involved in alleged wrongdoing (high priority within the Investigation group);
- Developing safety measures for staff investigators and subjects of complaint during and after an investigation.

### 3. Barriers

Many participant respondents were eloquent and frank in sharing perceived barriers to receiving and responding to allegations of staff sexual exploitation and abuse. Feedback was voluminous and roughly divides into five categories:

(1) Fears by the beneficiaries experiencing SEA about stigma, losing access to humanitarian goods and services or cultural taboos. These fears prevent complainants from coming forward.

(2) No complaints mechanisms or reporting mechanisms in place.

(3) Virtually inaccessible complaints mechanisms due to lack of awareness, lack of privacy and unclear outcome or investigation process expectations by beneficiaries once a complaint is reported.

(4) One respondent summarized a possible category as, “lack of initiative and accountability by a management team that is hesitant in taking on new roles with little precedent.”

(5) Lack of NGO investigators to respond to allegations. Although a number of evaluation participants explained and even shared their NGO’s reporting policies, the majority of organizations participating in BSO, while they have codes of conduct, do not yet have SEA reporting policies or procedures. Nearly half report complaints mechanisms but were dubious<sup>17</sup> about their accessibility.

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<sup>16</sup> All BSO learning program cases and investigation scenario examples are drawn from real examples but with changed names or factual information to protect privacy and confidentiality.

<sup>17</sup> One BSO participant with several years’ refugee camp program management experience put herself in beneficiary “shoes” to consider accessibility of existing complaints mechanisms. She offered that even if she knew to whom to report a complaint and had transportation fees to get to a designated focal point, she wouldn’t brave the guards and secretarial staff demands that she “state her business” which would be required in order to arrive in the office of an unknown focal point; a focal point with which she likely had zero previous contact. She clearly illustrated the impassable, lengthy list of obstacles a complainant would have to overcome to report a complaint in one of the camps where she worked and posited that lots more had to be done before allegations would be received for follow-up.

#### 4. Unexpected Outcomes

It is exciting to note that 74 percent of BSO participants are locally recruited NGO staff. In most humanitarian NGOs, local staff have more direct beneficiary contact than expatriate staff. High staff turnover is often a programming and continuity obstacle for NGOs.<sup>18</sup> In BSO's case, turnover, especially of locally hired NGO staff, may increase sharing of investigation concepts and protocols between organizations. This is supported by BSO participants who have changed jobs and are utilizing their investigation knowledge in new positions. Other unexpected outcomes influenced by the BSO learning program participation include:

- At least one NGO adopted a zero tolerance of sexual relationships between staff (including refugee staff incentive workers) and beneficiaries. National and international staff and volunteers are prohibited from having sexual relationships with beneficiaries. This policy, codified in FilmAid International's code of conduct, raises staff conduct a notch higher than the SG's Bulletin language to "strongly discourage" relationships with beneficiaries.<sup>19</sup>

As the FilmAid International Director of Programs explained, the organization would not attempt to establish genuine "love" relationships in an equation with an inherent power imbalance. Relationships might be pursued post employment at an individual's discretion but not while employed by FilmAid. This regulation applies to national and international staff.

- BSO investigation protocols and skills are reported to be highly useful by participants who conducted investigations which turned out to be non-SEA staff impropriety or unsubstantiated staff abuse.
- One NGO country director sought out and participated in the BSO Management workshop as a precursor to UNHCR partnership. His goal was to build internal understanding of and compliance with the SG's Bulletin prior to beginning direct service refugee programs.
- BSO workshop discussions challenged staff from one child-focused NGO to reconsider SEA within a broader context of beneficiary vulnerability, not just child vulnerability, served by their humanitarian programs.
- Training of national advocate NGO workers (Egypt, Palestine and Afghanistan) has helped inform their efforts to formulate national policies, as well as with developing local partnerships to institutionalize BSO-related learning.
- An urban-based access to justice workshop that reaches out to local police with SEA-related training exercises - as one response to urban refugees' concerns about alleged police-perpetrated SEA.<sup>20</sup>
- Inter-agency discussions to establish mechanisms for SEA victim physical protection in Kenya.

<sup>18</sup> More than 12 of the 60 participants who responded to this evaluation report having changed positions or employers.

<sup>19</sup> Local and incentive FilmAid staff are prohibited from having "exploitative" relationships with beneficiaries. They need to notify the organization and their case will be reviewed individually.

<sup>20</sup> This activity is influenced by both IRC's PSEA program in Kenya and by BSO workshop participation.

## 5. Parallel and Intersecting Initiatives

There are many existing or potential synergies with related initiatives.<sup>21</sup> In Kenya, for example, it is impossible to isolate BSO learning program impact from that of the Preventing Sexual Exploitation and Abuse (PSEA) program (details on the project provided below). With some initiatives, such as PSEA and Keeping Children Safe, there is close collaboration. In terms of complaints mechanisms, setting protection standards, SEA awareness raising and accountability efforts, there is valuable but sometimes disconnected overlap with other efforts. More and regular sharing would be to the benefit of all. Below are synopses of two intersecting initiative examples of which BSO is a critical complement.

*Additional initiatives with existing or possible intersections with ICVA/BSO are found in Appendix V.*

### **PREVENTING SEXUAL EXPLOITATION AND ABUSE PROGRAM (PSEA) - KENYA**

The PSEA program in Kenya is an inter-agency initiative instigated by an NGO partnership comprising IRC, CARE International and FilmAid International, in collaboration with UNHCR. Participation in PSEA was a collaborative response to SEA by all 14 agencies supporting refugee populations resident in Kenya. Hence, the 14 signatories to the 2003 adopted the “*Code of conduct for humanitarian workers in the Kenya refugee program.*” This triumvirate provides SEA awareness trainings, prompts or hosts regular SEA focal point meetings and maintains regular intra-organizational high-level contact focused on SEA issues. Creative use of film to provide SEA information to staff and beneficiary populations is a PSEA innovation. A key recent accomplishment was the March 2006 signing of a memorandum of understanding outlining *Inter-Agency Protocols for the Prevention of Exploitation and Abuse in the Kenya Refugee Program*. All 14 signatories agreed to adopt and adhere to a locally adapted version of the IASC Model Guidelines. The agreement creates participating agency roles and responsibilities enabling joint activities, including investigations of alleged SEA.

- “The Kenya [PSEA] program relies on the BSO project to develop standards and training material for the investigators, rather than seeing this as something they have to work on independently. Having agreed systems, procedures [and] safeguards is a vital part of trying to avoid the secondary damage that results from the duplication of investigative interviews should more than one agency be implicated.”<sup>22</sup>
- BSO workshop attendance is encouraged for key staff such as staff based in Kenyan refugee camps, especially those performing as SEA focal points. The PSEA program utilizes some of the same training materials.
- FilmAid has just completed four SEA awareness-raising short films<sup>23</sup> in English, Swahili, Somali, Dinka and Arabic, conceptualized and developed with the refugee communities in Kenya. These were highly

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<sup>21</sup> Based on conversations with other organizations, BSO has made an excellent effort to reach out to parallel and intersecting initiatives.

<sup>22</sup> Emailed comment by Jane Warburton from IRC. April 6, 2006.

<sup>23</sup> FilmAid is disseminating the films in all refugee camps in Kenya and in Nairobi, through mass information evening screenings, daytime screenings and workshops with facilitated discussions.  
[www.filmaidinternational.org](http://www.filmaidinternational.org) for more info.

popular training tools with recent BSO workshop participants. The films will provide lively media tools facilitating SEA awareness with both humanitarian workers and program beneficiaries.<sup>24</sup>

### **KEEPING CHILDREN SAFE INITIATIVE**

Formed in 2003 by a consortium of international NGOs in partnership with the British National Society for the Prevention of Cruelty to Children (NSPCC), Keeping Children Safe assists agencies to develop their understanding of minimum standards to keep children safe from abuse. In mid-March 2006, the Keeping Children Safe Initiative launched a Keeping Children Safe Toolkit. This resource package is for agencies working in both humanitarian and development contexts. The Toolkit assists organizations to meet an “appropriate level of training, information and support to fulfill their roles and responsibilities to protect children.”<sup>25</sup> Now in the beginning of a third phase, Keeping Children Safe is promoting and supporting use of the toolkit to adopt standards preventing abuse and creating a preventative environment for international and local NGOs, international organizations, implementing partners of international NGOs, relevant government organizations and any other agencies that require child protection measures be put in place.

- Building Safer Organizations develops capacity that intersects and complements Keeping Children Safe when a complaint of abuse is received. Both BSO and Keeping Children Safe are looking to support capacity-building activities through regional networks and are in discussion about further collaboration in building mutually reinforcing networks.
- Keeping Children Safe advisors have participated in BSO training material formulation and at least one has participated in several workshops as a course advisor.

Although BSO is a critical complement of the above initiatives, more and increased sharing of BSO information through wider communication channels will help highlight opportunities for other parallel or overlapping initiative synergies. Increased discussion and regular sharing with initiatives such as the Steering Committee for Humanitarian Response’s (SCHR) peer review process and the Humanitarian Accountability Project-International<sup>26</sup> may exponentially increase usage of common language, approach and investigation standards within the humanitarian community. This cross-fertilization of investigation standards will extend their accessibility to humanitarian agencies or staff outside those participating in BSO learning program.

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<sup>24</sup> It seems possible if not logical, that as more viewers see FilmAid films, information shared will likely contribute to increased awareness of SEA and potentially to increased reporting of complaints. Thus, viewing may also increase demands for response to reported SEA allegations against humanitarian staff.

<sup>25</sup> Keeping Children Safe Toolkit Introduction. Received thanks to Colin Tucker at Terre des Hommes.

<sup>26</sup> Two initiatives with obvious complementarities to BSO program objectives, which are introduced in Appendix V.

# What Can We Learn From This Pilot? Exploring Three Cross-cutting Themes

## A. Building Critical Mass, Capacity for Investigations

Evaluation responses elicited different approaches to sharing investigation skills capacity. Reviewing these approaches, presented below, offers insights into how organizations maintain informal “working groups” or networks among former BSO participants.

- The PSEA Kenya example, as explained in the section above, is the largest collaborative response to SEA. Fourteen agencies supporting refugee populations in Kenya formally adopted standards and protocols encompassed within the BSO learning program. Investigation capacity is one piece of larger SEA prevention and response efforts. **Agreed upon collaboration protocols** combined with BSO training of staff investigators have enabled at least one joint investigation and opened the door for future investigation collaboration.
- Staff within Oxfam, Terre des Hommes and IRC who participated in the BSO learning program formed informal **intra-organization networks**. These networks facilitate sharing of SEA information to the wider humanitarian agency and provide feedback to SEA-related policies. They may also facilitate rapid mobilization of in-house investigation skills when needs arise.
- BSO participants have created informal **inter-organization networks**. During BSO workshops, participants have met or re-met counterparts from other organizations through workshop activities in a way that builds trust. Drawing on this BSO-facilitated rapport with colleagues, some participants report using these informal network contacts as a confidential sounding board for investigation process questions, support or other SEA-related advice.
- Terre des Hommes<sup>27</sup> **attended BSO workshops with a key local partner**, the Bright Tomorrow Society for the Protection of Children. Both are involved with Egyptian national policy formulation and simultaneously pursued BSO-related capacity building partly as a shared foundation towards future collaboration.

In considering next steps, a pivotal question to ask is whether NGOs are willing to request or accept external assistance? Responses ranged from unwillingness to reluctance to rely on or borrow external investigation assistance. One evaluation respondent said they would do so “only in the gravest of situations.” A US-based senior manager queried whether it was really feasible, given the potential legal implications. He doubted that his general counsel would agree to external or joint investigations. There is serious dissonance between field-level staff commitment to inter-agency investigations and belief that they are the “way forward” and headquarters staff (with the exception of

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<sup>27</sup> Interestingly, Terre des Hommes is the only organization participating in this evaluation subjecting internal investigation procedures to an external check and balance. When a child abuse concern is raised, Terre des Hommes draws upon an informal group of external experts comprising lawyers, academics, board members and others to analyze how investigation measures and procedures have been followed.

Terre des Hommes), who are either dubious or adamant that such investigations will not be possible. Against this backdrop, it will be important to build NGO headquarters' understanding of inter-agency BSO-trained staff networks to ensure their support. PSEA in Kenya provides a tangible example of this possibility.

## **B. Sharing a Common Language, Approach and Investigation Standard Across Organizations**

Commenting on the BSO project's objective to "promote a common understanding, approach and investigation standard based on the UN SG's Bulletin and the IASC draft Model Complaints and Investigations Guidelines," one Kenya-based participant responded: "If common understanding means commitment, we are not there yet. If it means cooperation, we are there. Common language means coming to agree on basic principles and operations. It is a continuous process."<sup>28</sup> Suggestions for building investigation common language, approach and standards by evaluation participants are:

- Collaboration between organizations to implement the guidance provided on investigation and begin documenting "best practice." Since NGO capacity varies greatly, explore the minimum an organization must have in place to achieve a reasonable investigation standard.
- A number suggested that SEA trainings need to reach much higher into their senior management ranks.
- Issue a blanket invitation at the start of the next big humanitarian emergency for all humanitarian staff to be trained in SEA complaints mechanisms, reporting and investigation procedures.

A total of 137 participants from local NGOs, INGOs, networks of NGOs and others have been trained through the BSO learning program. A number of these who now have investigation experience share a clear commitment to IASC draft Model Complaints Investigation Guidelines approach and feel "professional" when they use it. Indeed, training on and use of investigation protocols both seem to create advocates who promote them. As BSO-trained NGO staff move on professionally to assume positions within other humanitarian organizations, they import their investigation language with them. The next huge step towards building investigation common language, approach and standards and a way to reach individuals will be dissemination of the Investigations Handbook (*under development*). The Handbook will reach humanitarian agency staff that may not participate in the BSO workshops or be aware of the IASC Guidelines document.

## **C. Enhanced Protection**

All BSO participants<sup>29</sup> who responded to a question about protection viewed the BSO learning program as directly and indirectly improving beneficiary protection in several ways. In following investigation protocols, investigators collect evidence in an impartial way. In applying fundamentals learned, BSO participants prevent further harm to beneficiaries as a result of badly conducted or separate but overlapping, investigations. BSO learning program participants leave with a heightened SEA awareness and

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<sup>28</sup> Other participant comments included: "A few people have it [but] people are still using different terms in different senses." "Working together helps." "It is beginning to happen." "But when you sit down to collaborate; everything comes up sixes and sevens." "Standard [investigation procedures] is not done well, yet." "Look at SPHERE. It boosted a common approach but took time [to be adopted]."

<sup>29</sup> For a few of the interviews, there was no time to respond to this question. With several early interviews, this questions was not included (4/60).

increased watchfulness for SEA risks. Some BSO participants appear to have finally buried any SEA-related denial and protests that “it’s not our organization and not our staff” who engage in SEA. Many participants report prioritizing proactive action to address areas of risk, rather than waiting for problems to come to them.

BSO assists NGOs in understanding and interpreting their obligations under the SG’s Bulletin.<sup>30</sup> BSO workshops highlight grey areas, caused by differences between national laws, cultural or faith-related norms and humanitarian agency-expected staff conduct standards. Participant discussions underscored the need to regularly discuss SEA issues with colleagues, refugee leaders, host communities and all others touched by or involved in providing humanitarian assistance in order to continuously build common standards. Although improved protection is not an explicit BSO objective, participants acknowledge that is definitely a learning program outcome.

Evaluation participants report that investigations of NGO staff have been carried out directly by UNHCR, in partnership with UNHCR or demanded by UNHCR. Now that there are more NGOs investigating or poised to investigate their staff misconduct, these experiences indicate an opportunity to re-initiate discussions with UN agencies<sup>31</sup> regarding investigation coordination, policies and procedures in order to continue to minimize potential harm for those reporting alleged incidents of abuse.

## Conclusions

In less than 18 months, BSO has proven itself a valuable tool for NGO use in strengthening their capacity to receive and investigate allegations of sexual exploitation and abuse of beneficiaries by staff. As a tool, BSO is only as good as its use by humanitarian agencies. Faced with an 18-month time horizon for continued BSO learning program activities, NGOs, including ICVA and InterAction, are challenged with collectively harnessing and making the best use of the BSO learning program. One senior manager advised, “Take the long view.”<sup>32</sup>

Participation by 43 organizations has done much to build skills and raise awareness but does not imply effective investigation capacity. Only 14 organizations supported four or more staff to participate in BSO learning programs. Participants listed organizational lack of investigation capacity as one obstacle to conducting investigations. Yet collaborative investigations run against NGO desires to hide “dirty laundry” and competitiveness. Other collaborative initiatives focused on child abuse standards and efforts to improve complaints mechanisms in inter-NGO transparency can be encouraged. These initiatives create great opportunities for BSO collaboration and fostering complementary networks.

Existing BSO learning program materials are well field tested. They incorporate participant feedback reflecting participant work experiences in more than 30 countries. Investigation and Management workshop materials are effective, well received and some modules are being replicated at field level by NGO participants. The BSO learning

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<sup>30</sup> Meaning that no one can ever “look the other way” because those who do will be at fault and can be held accountable for neglecting to investigate alleged SEA or for having failed to create a safe environment for beneficiaries.

<sup>31</sup> Through ICVA—as included in their mandate.

<sup>32</sup> Discussion with IRC’s Vice President for International Operations, John Keys on March 20, 2006.

program is highly valued by participants. Evaluation participants described a broad range of post-BSO learning program activities which they have instigated. While many of the participants selected are well placed to apply BSO instilled learning and skills, approximately one-fifth of evaluation participants may not have been ideal candidates for the learning program.<sup>33</sup> Commensurate with BSO's quickly garnered reputation for excellence is increasing demand for more from the BSO learning program.

BSO workshop participants reported feeling well prepared to manage or participate in investigations. Acknowledging their need for practice beyond BSO to continue building their investigation skills, many participants expressed interest in building investigator networks and in opportunities for mentoring. Although reports of sexual exploitation and abuse of beneficiaries by humanitarian staff are currently rare, 10 participants conducted investigations following their BSO training. Nine reported satisfaction with their investigation outcomes. They attributed this to being well prepared, using clear investigation protocols and conducting prompt investigations following receipt of an allegation.

As SEA awareness-raising efforts increase and complaints mechanisms become more accessible over the next several years, we should expect a corresponding rise in reported allegations requiring investigation. Collective and individual NGO strategic planning to ensure that BSO learning program elements remain available and accessible for the longer term will be critical to avoid future re-invention of the wheel.

## **Looking Forward—What Next?**

Since steps such as effective complaints mechanisms, which allow for receipt of alleged SEA incidents, are not yet firmly in place, it is not possible or realistic to expect that investigation skills will be institutionalized, sustainable or even fully realized within the very near term. Currently, BSO is the only source for NGO skills training to strengthen capacity for receiving and investigating allegations of sexual exploitation and abuse of beneficiaries by staff. On a practical note, BSO has a full-time capacity of two staff members within ICVA. Faced with an 18-month time horizon of BSO learning program training modules, investigation expertise, SEA-related analytical and training skills, now is the time to go back to NGO consumers of BSO learning program activities, donors and the UN (through ICVA and InterAction) for collective discussion, action and input into follow-on steps.

Additionally, NGO staff who participated in this evaluation have identified obstacles and requested opportunities for investigation practice or mentoring. They have also created different approaches to sharing investigation skills. Working with their NGOs, BSO has an obligation to explore ways to continue to build these participants' investigation skills and support networks within BSO's near-term agenda.

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<sup>33</sup> Due to self selection (for an interesting training opportunity) or haphazard organizational staff nominations, 20 percent of evaluation respondents were not feeling well placed or were lacking supervisor support to apply BSO learned skills to improve SEA prevention, reporting or investigation activities within their organizations. Please refer back to the Participant Selection and Promotion sections on pp. 9-10 for more discussion of this BSO program obstacle.

## Recommendations

### 1. INCREASE HUMANITARIAN COMMUNITY AWARENESS

- Establish stronger ties with InterAction, and through it, engage NGO members who have participated minimally or who have been notably absent from BSO learning programs.
- Create easier, non-password-protected access to BSO information on ICVA's website. Consider sharing BSO information with UN Relief Web, InterAction's Protection Resource library or other humanitarian web sites.
- Publicize progress to date, information on upcoming workshops and BSO materials available through wider communication channels.
- Discuss advocacy and next steps with and through ICVA, InterAction and SCHR to ensure that BSO materials and progress are not lost.

### 2. BUILD NETWORKS TO SUSTAIN REPORTING AND INVESTIGATION SKILLS

- Share names of the 137 participants within the 43 organizations who have participated in BSO learning programs. Through InterAction and ICVA, foster discussions addressing NGO intentions to utilize skills already built, and NGO thoughts or current activities to facilitate continued learning and the development of their NGOs' investigation capacity.
- Partner with humanitarian agencies to conduct Training of Trainers (TOTs) and draw on past participants in order to facilitate country-based or regional networks for future investigation support and training.
- Ask participating NGOs to assist ICVA/BSO by defining their institutional support for intra-organizational investigation resource networks.<sup>34</sup>
- Use dissemination of the forthcoming Investigations Handbook as another avenue for opening communication lines to capture progress and obstacles encountered in conducting investigations. Connect this feedback to protection working groups, NGO headquarter protection focal points and through emerging SEA networks.
- Work through ICVA and InterAction to encourage learning to support effective investigations between NGOs.

### 3. MORE EFFECTIVE BSO PARTICIPATION

- Engage senior NGO managers, through InterAction and ICVA, in encouraging nomination of appropriate candidates in order to avoid using this valuable resource as a reward for hard-working, albeit less appropriate, staff members.
- Workshop participants should be strategically chosen by their organizations and should be staff members who will conduct investigations, develop policy and/or train other agency staff.

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<sup>34</sup> Also working with highly motivated and/or well-placed individual BSO participants trained during the last year.

- Encourage BSO-learned skills performance monitoring and feedback by their home organizations through incorporation into the participants' job descriptions.

#### **4. FUTURE PLANS: ALTERNATIVE TRAINING FORMATS**

- Discuss the longer-term BSO learning program with NGOs that had high levels of participation<sup>35</sup> in order to identify training format options that would enhance future skills building in investigation and reporting.
- Explore other training formats, such as web-based training and Training of Trainers, with NGOs through ICVA/InterAction-hosted discussions.
- Coordinate with other training programs for the inclusion and use of BSO materials.
- Identify long-term repositories for BSO program materials.

#### **5. OBSTACLES IDENTIFIED AND POSSIBLE SOLUTIONS**

- Encourage ICVA, InterAction, UNHCR and other UN agency endorsement of the BSO Investigations Handbook to encourage publicly shared commitment to common language, approaches and standards therein.
- Re-engage UNHCR and other UN agencies as invested stakeholders in SEA prevention and response.
- Given serious dissonance between field-level staff commitment to and belief that inter-agency investigations are the “way forward” and the majority of HQ-based staff, who are either dubious or adamant that it will not be possible, it will be important to collectively define and discuss types of support investigation networks can reasonably offer.
- Continue to support NGOs currently building investigation capacity. The few NGOs that are strategically planning and participating in the BSO learning program are in the early stages of building reporting and investigation capacity.<sup>36</sup>
- Promote external investigations, including those conducted by other NGOs, to enhance transparency and neutrality of both the investigation process and their findings.
- Define minimum standards that must be in place to ensure effective SEA investigation and reporting.

#### **6. EFFECTIVE COMPLAINTS MECHANISMS LACKING**

- Complaints mechanisms are reported by BSO participants to be absent in many humanitarian contexts. Facilitate sharing among humanitarian organizations, through InterAction, ICVA and SCHR to encourage effective complaints mechanisms and linking complaint receipt with prompt investigation of alleged SEA incidents.

***“There are no sacred cows.”<sup>37</sup>***

—Sibajene Munkombwe, LWF

<sup>35</sup> Twelve of the 43 participating organizations supported four or more staff participants in the BSO learning program.

<sup>36</sup> Currently, many NGOs have little or possibly over-estimated in-house investigation capacity.

<sup>37</sup> Meaning, no one is above investigation if there is an allegation of SEA.

## **Appendices**

- I. BSO Evaluation Contact List
- II. Illustrative Themes of Inquiry and Analysis
- III. Organizations Represented by BSO Participation
- IV. Participant Profiles at the Time of BSO Training
- V. Additional Parallel and Intersecting Initiatives
- VI. Bibliography

## APPENDIX I - BSO Evaluation Contact List

### BSO PARTICIPANT CONTACTS

1. Mr. Nagi Khalil, ADRA/Yemen
2. Mr. Paul Smart, ADRA/Ethiopia
3. Mr. Abdul Mobin Ezzat\*, ADSO
4. Ms. Vivi Akakpo, All Africa Conference of Churches, Kenya
5. Ms. Rana Taher (formerly with AMERA in Egypt)
6. Mr. Sayed Jawed Jawed\*, ANCB/Helping Afghan Farmers Organization, Afghanistan
7. Dr. Tarek Omar, Bright Tomorrow Society for the Protection of Children, Egypt
8. Blessing Maronedzie, CARE International/Zimbabwe
9. James Okaka\*, CARE International in Kenya
10. Annabel Kogi\*, CARE International in Kenya
11. Betty Cheung\*, Caritas in Hong Kong
12. Sr. Cecilia Suwanee, COERR in Thailand
13. Molly Ayieumba\*, Concern Worldwide in Kenya
14. Uma Sanjel, Concern Worldwide, Uganda
15. Annabelle Conway, Concern Worldwide, Dublin
16. Laura Cometta\*, Concern Worldwide, Dublin
17. Rosina Conteh\*, Council of Churches, Sierra Leone
18. Mildred Beulah Fusani\*, Evangelical Lutheran Development Program
19. Charles Otieno, FilmAid International, Kenya
20. Stella Suge\*, FilmAid International, Kenya
21. Natalia Tapias, FilmAid International, Kenya and Tanzania
22. Roisin Gallagher, Independent, formerly FilmAid International, Tanzania
23. Hajer Omer Sayed, International Medical Corps, Sudan
24. Embet Geda\*, International Rescue Committee, Ethiopia
25. Dickson Musyimi\*, International Rescue Committee, Kenya
26. Jane Ndung'u\*, International Rescue Committee, Kenya
27. Musili Nzau, International Rescue Committee, Kenya
28. Irene Kariuki\*, International Rescue Committee, Kenya
29. Tamba Gborie\*, International Rescue Committee, Sierra Leone
30. Grace Mogaka, International Rescue Committee, Southern Sudan
31. Liviu Vedrasco, International Rescue Committee, Thailand
32. Sr. Bernadette Mangan, Jesuit Refugee Services, East Africa Region
33. Stephen Power, Jesuit Refugee Services, Rome
34. Lynn Yoshikawa, Jesuit Refugee Services, Thailand
35. Sibajene Munkombwe, Lutheran World Federation, Zambia
36. Chele DeGruccio, Lutheran World Federation, Kenya and Sudan
37. Moses Singei\*, Malteser International, Rumbek, Sudan
38. Sharizad Shamsuddin\*, Mercy Malaysia
39. Renuka Akarawati Nishanthi\*, National NGO Council of Sri Lanka
40. Lamba Nfanda\*, OFADEC, Senegal
41. Huda Abbas, Oxfam Great Britain, Yemen
42. Lucy Heaven, Oxfam Great Britain, UK
43. Fatu Morris, Oxfam Great Britain, Liberia
44. Amalee McCoy\*, Plan International, Thailand
45. Mariama Deschamps, Save the Children, UK
46. Aungkie Sopinpornraksa, Thai Burma Border Consortium
47. Khalil Marouf, Terre des Hommes, Palestine
48. Waqar Hussein, Terre des Hommes, Pakistan
49. Jean-Christophe Gerard, Terre des Hommes, Egypt
50. Ayman Mohareb\*, Terre des Hommes, Egypt
51. Shilpa Lecpcha, Terre des Hommes, Nepal
52. Misko Mimica\*, UNHCR, (formerly in Nepal)

53. Stephanie Lepoutre\*, UNHCR, Democratic Republic of Congo
54. Amr ElGundi\*, UNHCR, Kenya
55. Annie Moore\*, UNHCR, Liberia (formerly IRC/Guinea)
56. Aleena Khan, UNICEF/Pakistan (formerly IRC/Pakistan)
57. Souleymane Sagna\*, WARPINET, Senegal
58. Jennifer Jones, World Education Consortium, Thailand
59. Lisa Primising\*, World Vision International, Middle East/Eastern Europe
60. Malar Nurdin\*, World Vision International, Aceh Indonesia

#### NON-PARTICIPANTS CONTACTS

1. Maria Thestrup, UNHCR and BSO workshop facilitator
2. Anne Coutin, IFAD (formerly UNHCR), BSO workshop facilitator
3. Pamela Shifman, UNICEF and Co-Chair (former) IASC Working Group on Sexual Exploitation and Abuse and BSO advisor
4. Lisa Jones, UNOCHA Co-Chair (former) IASC Working Group on Sexual Exploitation and Abuse, BSO advisor
5. Madhuri Narayan, CARE USA
6. Jane Warburton, International Rescue Committee, New York , BSO program instigator
7. Dianna James, (formerly of International Rescue Committee), BSO workshop facilitator
8. Jenny Fletcher, International Rescue Committee, Kenya
9. John Keys, International Rescue Committee, New York
10. Colin Tucker, Terre des Hommes and Keeping Children Safe Initiative and BSO advisor
11. Ignacio Packer, Terre des Hommes
12. Paul Nolan, Plan International and Keeping Children Safe Initiative and BSO advisor
13. Zia Choudhury, HAP International, BSO advisor
14. Gwen Young, MSF-Holland
15. Sayed Fazlullah Wahidi\*, ANCB and ICVA Executive Committee
16. Ann Mary Olsen, Danish Refugee Council and ICVA Executive Committee
17. Ed Schenkenberg, ICVA Director
18. Nicole Gaertner, Bureau for Population, Refugees and Migration, US Department of State
19. Mary Pack, International Medical Corps (formerly with InterAction)
20. Eva von Oelreich, Steering Committee for Humanitarian Response (SCHR)

\*comments by email

## APPENDIX II - Illustrative Evaluation Themes of Inquiry and Analysis

(Explored in interviews and email responses)

<p>DO PARTICIPANTS AND PARTICIPATING ORGANIZATIONS VALUE THE BSO LEARNING PROGRAM?</p>	<ul style="list-style-type: none"> <li>• Perceived value of the BSO learning program to individuals <u>and</u> their organizations.</li> <li>• Do participants refer back to their training materials?</li> <li>• Changes in staff SEA attitudes or staff contributions around SEA-related issues noted by supervisors?</li> </ul>
<p>WHAT DID THEY LEARN?</p>	<ul style="list-style-type: none"> <li>• Reported change in personal awareness of sexual exploitation or abuse-related issues.</li> <li>• Reported new skills.</li> </ul>
<p>HOW DO PARTICIPANTS APPLY THEIR LEARNINGS?</p>	<ul style="list-style-type: none"> <li>• Post training, what have participants done with the skills and knowledge learned? How have participants created opportunities to share this information? (With or for whom?)</li> <li>• Number of participants who have been involved in an investigation? Are those managing and investigating investigations comfortable with skills developed from participating in the ICVA/BSO learning program? (Are there any skills still lacking?)</li> <li>• How relevant was the ICVA/BSO training in assisting participants who have conducted investigations?</li> <li>• Impact for change on individuals/organizations of ICVA/BSO trainings? (Examples: changed procedures; policies; efforts to increase beneficiary awareness of and access to complaints mechanisms; etc.)</li> </ul>
<p>WHAT BARRIERS OR OBSTACLES HOLD PARTICIPANTS BACK?</p>	<ul style="list-style-type: none"> <li>• What issues may prevent organizations from investigating allegations of staff sexual exploitation and abuse?</li> <li>• Would organizations be willing to ask for external investigation assistance? Why or why not?</li> <li>• Based on your experiences, what barriers or obstacles block beneficiaries from reporting abuse or exploitation?</li> </ul>

### APPENDIX III - Organizations Represented by BSO Participation

<b>ORGANIZATION</b> <i>ICVA members are italicized</i>	<b>STAFF PARTICIPATION IN BSO WORKSHOP(S)</b> <b>M=Management</b> <b>I=Investigation</b> <b>F-up=Investigation Follow-up</b>	
Adventist Development and Relief Agency (ADRA)	3	3 M
<i>Afghan Development and Social Organization (ADSO-member of ANCB)</i>	1	M
<i>All African Conference of Churches</i>	1	I, F-UP
<i>African and Middle East Refugee Assistance (AMERA)</i>	1	I, F-UP
<i>Afghan Planning Agency (from Afghan NGOs Coordination Bureau-ANCB)</i>	1	M
African Network for the Prevention and Protection against Child Abuse and Neglect (ANPPCAN)	1	I
African Refugee Training and Employment Services (ARTES)	1	I
Bright Tomorrow Society for the Protection of Children	5	3M, 2 I, 1 F-UP
<i>CARE International</i>	7	5 M, 2 I, 1 F-UP
CARITAS	2	2 I
Catholic Office for Emergency Relief and Refugees (COERR)	3	1 M, 2 I
<i>Concern Worldwide</i>	7	7 M
<i>Councils of Churches (Zambia and Sierra Leone)</i>	4	2 M, 2 I
All India Disaster Mitigation Institute	1	I
Don Bosco	1	I
Evangelical Lutheran Development Services	2	1 M, 2 I
FilmAid	5	3 M, 2 I, 2 F-UP
GTZ	2	2 I
<i>Helping Afghan Farmers Organization (HAFO-ANCB member)</i>	1	I
International Medical Corps (IMC)	3	3 M
International Organization on Migration (IOM)	1	1 I
<i>International Rescue Committee (IRC)</i>	24	15 M, 13 I, 3 F-UP
<i>Jesuit Refugee Service</i>	6	1 M, 5 I, 2 F-UP
Joint Voluntary Agency	1	I
Koh-i-Noor Foundation (ANCB)	1	M
Legal Aid Foundation (of the Sri Lankan Bar Association)	1	I
<i>Lutheran World Federation (LWF)</i>	6	1 M, 5 I, 1 F-UP
Malteser International	1	F-Up
<i>Mercy Malaysia</i>	1	M
National Council of Churches (NCC-Kenya)	2	I, M
<i>National NGO Council of Sri Lanka (NNGOC)</i>	2	2 M
<i>Office Africain Pour le Developpement et la Cooperation (OFADEC)</i>	2	2 I
Oxfam-UK	5	1 M, 4 I, 3 F-UP
Plan International	2	M, I
Refugee Consortium of Kenya	1	I
Save the Children-UK	3	3 I, 1 F-UP
Strategic Initiative for Women	1	I
<i>Thai Burma Border Consortium (TBBC)</i>	2	2 I, 1 F-UP
Terre des Hommes	6	2 M, 5 I, 4 F-UP
UNHCR	10	10 I, 4 F-UP
West African NGO for Refugees and IDP Network (WARIPNET)	1	I
World Education/Consortium Thailand	1	M
<i>World Vision International (WVI)</i>	5	4 M, 1 I, 1 F-UP
<b>43 ORGANIZATIONS REPRESENTED</b>	<b>137</b>	<b>162</b>
	<b>participants</b>	<b>Workshops attended</b>

## APPENDIX IV - Participant Position Profiles at the Time of BSO Training

INVESTIGATIONS AND FOLLOW-UP WORKSHOPS	MANAGEMENT WORKSHOP
<p>Child Protection Officer  Protection Resources Specialist  Protection Officer/Specialist (2)  Protection Coordinator  Child Protection Officer  Human Resources Officer  Deputy Field Director/Coordinator (3)  Administration Coordinator  Capacity-Building Advisor  Community Services Clerk  Legal Aid  Legal Consultant  Counseling and Financial Assistant  Education Services Manager  National Legal Officer  Education Advisor  Deputy Camp Manager  Protection Manager  Program Assistant  Program Officer-Capacity Building and PO  Human Rights  Program Officer (2)  Projects/Program Coordinator (4)  Project Director  External and Governmental Relations Officer  Informational and Research  Gender Coordinator  Gender Protection  Women and Children Leader  Community Liaison Officer  Assistant Resettlement Officer  Social Worker Services  Social Counselor  Coordinator  Assistant to the Coordinator  Deputy Program Coordinator  Regional Coordinator (2)  Assistant Program Director  Internal Auditor  Administration Manager  Administration Coordinator  Medical Coordinator  Field Officer  Senior Data Processing Assistant  Office Administrator  Personnel Officer  Human Resource Management (2)  Head of Office  Senior Humanitarian Officer (HQ)  Regional Personnel Director  Director/Country Representative (4)  President</p>	<p>Child Protection Specialist/Advisor (3)  Child and Family Protection Team Manager  Protection Manager/Advisor (2)  Humanitarian Protection Advisor HQ  Office Manager  Sexual Assaults Referral Center Program  Manager  Protection of SEA Officer/Focal Point (2)  Administrative Secretary  Administrative Assistant  Administration Coordinator  Development Officer  Field Director  Field Coordinator (2)  Deputy Coordinator for Relief and Rehabilitation  Project Officer (2)  Assistant Project Coordinator (Gender and  Training)  Program Manager (2)  Head of Programs  Program Design, Monitoring and Evaluation  Nutrition Manager  Information and Education on Reproductive  Health Advisor  Senior Project Officer/Team Leader (3)  Regional Human Rights Director  Human Resources Director (HQ)  Human Resources Director  Human Resources Manager (2)  Senior Human Resources Officer (2)  Human Resources Officer Horn of Africa (HQ)  Human Resources and Administration Officer (3)  Human Resources Officer (2)  Assistant Country Director  Country Director or Director (2)  Board Member, Professor (3)</p>

## **APPENDIX V - Additional, Parallel and Intersecting Initiatives**

### ***STEERING COMMITTEE FOR HUMANITARIAN RELIEF (SCHR)—PEER REVIEW PROCESS***

All SCHR member organizations are completing a peer review process revolving around the collectively identified central theme “Protection against Sexual and Gender-Based Violence.” Member organizations commit to a timeline and plan for follow-up in response to findings and recommendations in the following areas: Red Cross/Red Crescent/NGO Code of Conduct; staff conduct; principles and standards of behavior; resources and practices in programming for protection from sexual exploitation and abuse; advocacy; developing capacity and competence and responsibility and accountability. While results remain within SCHR, the initiative fosters operational sharing and transparency between agencies. As individual organizations review policies, procedures, complaints mechanisms and staff perceptions of their internal handling of sexual and gender-based violence both in capitals and the field, capacity deficits around sexual exploitation and abuse of humanitarian program beneficiaries by staff are also considered. As the peer review moves into a new phase, summarizing experiences around prevention of sexual exploitation and abuse both on a policy level and in practice, lessons learned, best practice, issues and dilemmas will be shared more broadly. More information is available at: <http://www.humanitarianinfo.org/iasc/> (click on SCHR in the right hand column)

→ Sharing of ICVA/BSO learning program materials through SCHR, at this timely juncture, will support member awareness of existing materials as they consider how to enhance comprehensive responses to SEA. Additionally, the sharing will prevent potential duplication of effort. Circulating lists of individuals who have investigation experience will provide NGO field staff with valuable insights into response efforts to date.

### ***HUMANITARIAN ACCOUNTABILITY PARTNERSHIP-INTERNATIONAL (HAP-I)***

Grounded in a shared dedication to making humanitarian action accountable to intended beneficiaries, HAP-I members sign a public commitment in order to move beyond stated support for humanitarian standards towards operational and policy compliance with these standards. Through field visits, trainings and advice, HAP-I supports members to develop and implement NGO-created accountability workplans. One area of particular emphasis and recent sharing is creation of and discussion about SEA complaints managing frameworks. ([www.hapinternational.org](http://www.hapinternational.org))

→ April 2006 meeting co-hosted by HAP-I and the Danish Refugee Council on complaints mechanisms which was attended by the BSO project coordinator. Potential areas of intersection and mutual reinforcement include reviewing NGO member investigation policies and protocols; cost effectiveness of investigation efforts; building accountability and appropriate mechanism in new emergencies, etc.

### ***UN AGENCY—BROADER EFFORTS***

Current UN SEA efforts are numerous but unless you are in the “in group”<sup>38</sup> and receive information directly they appear to lack a central sharing point for SEA-related information, trainings, pending or current policies. UN staff report renewed enthusiasm and momentum for SEA-related capacity building and policy development.<sup>39</sup> These are many points of possible intersection with BSO; a few are listed here:

1) Once the IASC SEA working group of 2002-2004 completed its mandate, further UN SEA-related policy development was subsumed into the Executive Committees on Peace and Security and Humanitarian Affairs Task Force on Protection from Sexual Exploitation and Abuse. Within the Executive Committee, there are three designated working groups. Of these, the Support to Victims of Sexual Exploitation addresses UN policy formulation but is the only WG to actively share discussions with a wider NGO audience. These documents have been shared with BSO participants for field feedback on several occasions.

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<sup>38</sup> Directly involved UN staff or previously involved NGO staff still receiving email updates.

<sup>39</sup> Discussions with Lisa Jones (UNOCHA) and Pamela Shifman (UNICEF).

- 2) A pilot of the UN Interagency focal point training was staged in Ethiopia and incorporated several ICVA/BSO training modules.
- 3) Gender mainstreaming trainings and participatory process involving refugee beneficiaries come across SEA-related issues and are a potential avenue for including information on SEA reporting.<sup>40</sup> Additionally, the UN attempts to centralize UN and non-UN training resource information through its Humanitarian Assistance Training Inventory (Relief Web) which might provide a BSO course or handbook promotion spot. Through past informal collaboration with UNHCR, UNHCR staff have been loaned to BSO as workshop facilitators in for investigation modules.

***InterAction Protection Working Group***

A member of the Protection Working Group participated in an August 2004 meeting to test, comment on and revise materials. Original ICVA/BSO course dates were announced through InterAction's Protection Working Group. Co-trainings with InterAction have been discussed and the first will be held in June 2006. Notably absent in the BSO Learning program are participants from many well-known US-based humanitarian NGOs. Many of these same organizations have been very involved with discussions hosted through the Protection Working Group on broader protection issues and policies.

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<sup>40</sup> One BSO participant commented focus groups in Thailand uncovering SEA complaints in topics discussed.

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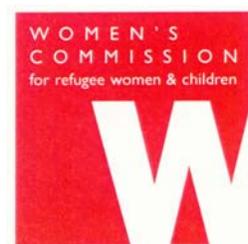
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<sup>41</sup> Received from the International Rescue Committee/Kenya Country Director.



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