## IWDA SUBMISSION: ACFID Independent review into prevention of sexual misconduct and DFAT Policy Preventing Sexual Exploitation, Abuse and Harassment

August 2018



International Women's Development Agency (IWDA) is the leading Australian agency entirely focussed on women's rights and gender equality in the Asia Pacific region. We are international, feminist and independent. Our vision is gender equality for all and our purpose is to advance and protect the rights of diverse women and girls.

IWDA congratulates the Australian Council for International development (ACFID) and Department of Foreign Affairs and Trade (DFAT) for their leadership in preventing sexual exploitation, abuse, harassment and misconduct. We welcome the opportunity to provide recommendations towards encouraging the International Aid and Development sector to take the lead in best practice and the establishment of new standards for preventing, responding to and supporting survivors of sexual exploitation, abuse, harassment and misconduct.

IWDA particularly acknowledges DFAT's financial and technical support to the ACFID independent review and the work being undertaken by the ACFID Code of Conduct Committee in reviewing the ACFID Code of Conduct. We recognise the strength and unique approach of the ACFID Code of Conduct and the positive contribution this has made to safeguarding vulnerable people including children. We also welcome the findings of the Interim Report that recognises "In some areas it seems that Australia has a number of specific strengths in safeguarding in comparison to other countries."<sup>1</sup>

IWDA also supports the many positive changes likely to result from the various reviews which have been undertaken including: a Zero Tolerance approach; strengthening the transparency and rigour of reporting; ensuring procedural fairness for all parties to a complaint; and the potential to align with other international standards including the Core Humanitarian Standards. We endorse the proposed change to the ACFID Code of Conduct to include a new Commitment under Quality Principle 1: Rights, Protection and Inclusion which would be as follows:

### *"1.5 We advance the safeguarding of those who are vulnerable to sexual exploitation and abuse."*

IWDA recognises the root causes of gender based violence - including sexual exploitation, abuse, harassment and misconduct - are multi-dimensional and a consequence of the inequality experienced by women and girls. We recognise that survivors of all forms of gender based violence will predominantly (though not always) be women and girls and that perpetrators will predominantly (though not always) be men and boys.

As a result, this submission focuses primarily on the need for independent, survivor centred mechanisms for reporting and investigation of complaints, within Australia and within ACFID organisations. It makes the following recommendations and is structured accordingly:

- Establishment of an independent unit to investigate serious complaints and to provide an alternative to potentially flawed internal processes
- A survivor and complainant centred approach in both policy and practice
- Harmonisation and integration of donor safeguarding requirements
- Integration of protection approaches for all vulnerable groups
- Development of best practice standards for investigation of complaints including the provision of complainant advocate support by people trained in sexual violence and its impacts
- Prohibition of all forms of transactional sex

<sup>&</sup>lt;sup>1</sup> Victorian Institute of Forensic Medicine (2018), 'Interim Report', *Independent Review to Improve Practice and Response of ACFID Members in the Prevention of Sexual Misconduct*, p. 33, available at <u>http://www.vifm.org/wp-content/uploads/2018/08/PSMR-Interim-Report-09.08.18.pdf</u>

• Prohibition of non-disclosure agreements.

This review presents an opportunity for the Australian aid sector to both learn from and influence international dialogue and practice. To this end, IWDA supports the call in the Humanitarian Advisory Group Independent Think Piece: May 2018 to '*Take advantage of [this] opportunity for transformative change.*<sup>2</sup>

### 1. Establishment of an independent unit to investigate serious complaints

The incidence of sexual harassment in Australia remains high and is disproportionately experienced by women. The Australian Bureau of Statistics *Personal Safety Australia 2016 Report* details that 53% of women and 25% of men experience sexual harassment in their lifetime and 17% of women in the last 12 months.<sup>3</sup> The Australian Human Rights Commission notes that one in five complaints to the commission relate to sexual harassment and the majority of these relate to the workplace.<sup>4</sup> While the Australian Human Rights Commission fourth national survey into workplace sexual harassment results have yet to be released, national trends are likely to follow these earlier findings.

Alongside this, evidence demonstrates that survivors of sexual harassment are unlikely to make a report or complaint and, when they do, are less likely to report that the complaint mechanism was responsive to their needs. For example, the recent Australian Report *Change The Course: National Report on Sexual Assault and Sexual Harassment at Australian Universities (2017)*<sup>5</sup> found that 94% of students who were sexually harassed and 87% of students who were sexually assaulted did not make a report or complaint to their university. Students who did make a formal report or complaint about sexual assault or sexual harassment were often dissatisfied with the response of their university.

Evidence also reveals that a sole focus on codes of conduct and policy development is likely to have limited impact. For instance, the Overseas Development Institute submission to the recent International Development Inquiry into Sexual Exploitation and Abuse in the Aid Sector<sup>6</sup> in the United Kingdom noted the work done over the past 16 years on Codes of Conduct and Safeguarding policies and concluded that a focus only on Codes of Conduct and policy development and implementation may be ineffective. Further, it also highlighted that existing complaints mechanisms are underused.

Given the high incidence of sexual violence and the need for complaint mechanisms to be responsive to the needs of survivors, IWDA considers current internal investigation processes to be inadequate in preventing conflicts of interest; protecting confidentiality; ensuring timely follow up to complaints; ensuring rigour and adequate training of

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<sup>&</sup>lt;sup>2</sup> Humanitarian Advisory Group (2018), 'From an Ombudsman to a Humanitarian Passport: How Should We Be Addressing Abuse in the International Aid Sector?', p. 1, available at <u>https://humanitarianadvisorygroup.org/wp-</u> <u>content/uploads/2018/05/HAG-Safeguarding-Thinkpiece-May-2018.pdf</u>

<sup>&</sup>lt;sup>3</sup>Australian Bureau of Statistics (2016), 'Experience of Sexual Harassment', available at: <u>http://www.abs.gov.au/ausstats/abs@.nsf/Lookup/by%20Subject/4906.0~2016~Main%20Features~Experience%20of%20S</u> <u>exual%20Harassment~29</u>

<sup>&</sup>lt;sup>4</sup>Australian Human Rights Commission, 'Listening Tour Fact Sheet: Sexual Harassment in Australia', available at: <u>https://www.humanrights.gov.au/listening-tour-fact-sheet-sexual-harassment-australia</u>

<sup>&</sup>lt;sup>5</sup> Australian Human Rights Commission (2017), 'Change the Course: National Report on Sexual Harassment at Australian Universities', p. 119, available at:

https://www.humanrights.gov.au/sites/default/files/document/publication/AHRC 2017 ChangeTheCourse UniversityRep ort.pdf

<sup>&</sup>lt;sup>6</sup> Overseas Development Institute Submission to the International Development Committee Inquiry 'Sexual Exploitation and Abuse in the Aid Sector', available at:

http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/international-development-committee/sexual-exploitation-and-abuse-in-the-aid-sector/written/81182.html

investigators and support people; and in providing a central tracking and recording system to monitor trends and compliance.

IWDA recommends the establishment of an independent, neutral, transparent, easily accessible unit within the development sector to develop, implement and resource:

- Independent Sexual Violence Advocates for complainants and survivors
- Trained investigators to support organisations
- Best practice guidelines
- Sector wide training in complaints management
- Taking and documenting complainants statements to avoid multiple repetitions across different stakeholders
- Consolidation of data for transparent reporting of frequency and response to incidents.

An independent unit has the advantage of allowing for anonymous reports, ensuring complainants are heard, have access to referrals for independent support and provides better evidence of the scale of the issue within the sector. In addition, an independent unit is more likely to refer cases to the police when a crime may have been committed.

Despite the complexity of establishing and providing long term funding to maintain a national unit, we believe this can be done cost effectively, with a small staff, a user pays system for investigations and by entering into service agreements and detailed referral processes with other providers such as Australian Centres Against Sexual Assault (CASA). Consideration can be given to hosting the unit within ACFID or Code of Conduct Committee mechanisms or with an ACFID member organisation. An independent unit will improve community and donor confidence in the approach of ACFID agencies.

We recognise the establishment of such a unit may not increase accessibility for community members and staff based internationally, and recommend that other supports, such as an International Ombudsman, will need to be considered to support these needs. A focus by member agencies on strengthening existing community-based, complaint mechanisms will further support complaints by community members and internationally based staff and a requirement by all member agencies to report serious complaints to the independent unit will provide increased transparency.

Reco	mmendations
1.1	Establishment of an independent, national unit within the development sector to respond
	to, track and support reporting of sexual harassment, violence or exploitation.
1.2	Support appointment of an International Ombudsmen to investigate and address complaints made by international staff and community members.
1.3	All ACFID member agencies ensure a focus on strengthening community-based complaints mechanisms.
1.4	A requirement is introduced that all ACFID member agencies must report serious complaints to the independent national unit.

### 2. A survivor and complainant centred approach in both policy and practice

IWDA recommends that a survivor centred approach is central to action to prevent sexual misconduct in the Australian sector and is at the core of responses to sexual exploitation, abuse and harassment. The Interim Report identifies the following as important to survivors:

We have heard from review participants that it is of utmost importance to strengthen the response to sexual misconduct, including the support provided to victim/survivors. This mirrors contemporary research, literature and best practice where a robust response to reporting of sexual misconduct must meet the needs of the victim so that they:

- feel physically and psychologically safe
- are listened to, valued and believed
- have access to counselling advocacy support
- have swift and competent investigative processes
- see tangible benefits which may include putting a stop to the violence, seeking health, social, or justice outcomes, financial reparation, job security
- are not punished for reporting and or seeking help.<sup>7</sup>

IWDA recommends that the basic standards developed by UN Women in implementing a survivor centred approach are applied in the development of policy, guidelines, tools and action taken in response. These standards call for the prioritisation of *the rights, needs, and wishes of the survivor* while ensuring natural justice for all parties to a complaint.

'Essentially, a survivor-centred approach applies the human rights-based approach to designing and developing programming that ensures that survivors' rights and needs are first and foremost. The survivor has a right to:

- be treated with dignity and respect instead of being exposed to victim-blaming attitudes
- choose the course of action in dealing with the violence instead of feeling powerless
- privacy and confidentiality instead of exposure
- non-discrimination instead of discrimination based on gender, age, race/ethnicity, ability, sexual orientation, HIV status or any other characteristic
- receive comprehensive information to help her make her own decision instead of being told what to do.<sup>8</sup>'

Such an approach is essential to support the rights of survivors and to ensure response mechanisms respect and respond to the needs of survivors. This will promote recovery and increase complainant's ability to identify their needs and priorities in pursuing complaints.

Recon	commendations	
2.1	Ensure that a survivor centred approach is central to action to prevent sexual misconduct in the Australian sector and is at the core of responses to sexual exploitation, abuse and harassment.	
2.2	Basic standards developed by UN Women in implementing a survivor centred approach should be applied in the development of all policy, guidelines, tools and action taken in response to sexual exploitation, abuse and harassment.	

### 3. Harmonisation and integration of donor safeguarding requirements

IWDA commends DFAT on their engagement in the Donor Safeguard Network, the Organisation of Economic Cooperation and Development (OECD) - Development Assistance

<sup>&</sup>lt;sup>7</sup>Victorian Institute of Forensic Medicine (2018), 'Interim Report', *Independent Review to Improve Practice and Response of ACFID Members in the Prevention of Sexual Misconduct*, p.25, available at <u>http://www.vifm.org/wp-</u>content/uploads/2018/08/PSMR-Interim-Report-09.08.18.pdf

<sup>&</sup>lt;sup>8</sup> UN Women, 'Survivor-centred Approach', *Virtual Knowledge Centre To End Violence Against Women and Girls,* available at: <u>http://www.endvawnow.org/en/articles/652-survivor-centred-approach.html?next=653</u>

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Committee (DAC) Reference Group on sexual exploitation and abuse, and for joining the UN Secretary General's Circle of Leadership.

These engagements provide an ideal opportunity to coordinate approaches and compliance standards of donors to ensure multiple compliance and reporting regimes do not undermine effective implementation, at all levels, of measures to tackle sexual exploitation and abuse in our sector. Key to this will be donors agreeing Core Principles and to recognise each other's certification and compliance mechanisms – for example DFAT's accreditation processes and ACFID Code of Conduct self-assessment processes, in the case of Australia. This will avoid organisations being subject to multiple compliance requirements. The International Safeguarding Summit in London in October this year provides an ideal opportunity to establish core principles and to secure commitment to this approach. We note the approach taken by the Danish Government, who funds independent Core Humanitarian Standards verification or compliance, as an example of an option to support the strengthening of safeguarding standards in Australia.

Recom	Recommendations	
3.1	Donors utilise opportunities, such as the upcoming International Safeguarding Summit, to develop core principles and to coordinate compliance and reporting requirements.	
3.2	Consideration is given to international best practice such as the approach by the Danish Government to fund independent Core Humanitarian Standards verification or compliance.	

### 4. Integration of Protection approaches for all vulnerable groups

IWDA also welcomes the advice provided by DFAT at the *Consultation on the DFAT Policy Preventing Sexual Exploitation and Abuse* (20<sup>th</sup> August) that integrated Safeguarding of Vulnerable People Policies (including children) will meet compliance requirements. We consider integrated policy, reporting and compliance mechanisms essential for small to medium sized organisation and for reducing administration burdens on international partners. Our International partners are often small, community based organisations with limited resources for implementing multiple, diverse, safeguarding requirements and approaches.

An integrated approach must ensure that the specific and differentiated needs and vulnerabilities of particular groups are recognised. Targeted protections for those with the least resources to protect themselves, such as children or people with a disability must be integral; however, we must also avoid conflating all at-risk groups with one another. Specific approaches must be in place to address the risks and needs presented by gender, disability status, and age, as well as their intersections.

As women and girls do not share the same power, privileges, rights and opportunities as men and are most impacted by sexual exploitation, abuse, harassment and misconduct, the various reviews must prioritise the needs, voices and experiences of women and recommendations of women's groups.

Recon	commendations	
4.1	Continue to support an integrated approach to implementing safeguarding approaches and reporting to reduce administration burdens for small to medium sized organisations.	
4.2	Ensure this integrated approach recognises the different needs and vulnerabilities of at risk groups including children and people living with a disability.	

# 5. Development of best practice standards for investigation of complaints including the provision of complainant advocate support by people trained in sexual violence and its impacts

IWDA recommends the development of sector wide, Best Practice Standards and Toolkits to support complaints handling that<sup>9</sup>:

**ENSURES CONFIDENTIALITY** – where it is not possible to guarantee confidentiality e.g. where referral is made to national authorities, or where the identity will be readily inferred from the detail of a complaint, the guiding principle in supporting complainants must be that of fully informed consent, with complainants provided detailed information on who will receive information and how this will be used.

**PROVIDES MECHANISMS FOR ANONYMOUS COMPLAINTS** – repeated studies demonstrate a high level of under reporting for sexual exploitation, abuse, harassment and misconduct. Fear of reprisal; complex and tiring reporting systems at a time of great personal vulnerability; and lack of confidence in reporting bodies inhibit reporting. Anonymous complaints can be treated as seriously as 'named' complaints - though the extent to which they can be investigated may be circumscribed by the anonymity. Anonymous reporting will provide more realistic data on the extent of the issue.

**ENSURES SAFETY AND WELL-BEING OF THOSE MAKING COMPLAINTS** - the needs of those making complaints must be provided for including:

- Provision of immediate medical and psychological or psycho-social support
- Medical and psycho-social support that continues after a determination is made and after the end of any employment relationship (in the case of paid employees)
- Protection plans where required, including limiting exposure to the person/s complained against
- Access to independent Legal Advice or support
- Access to survivor advocates trained in sexual abuse
- Professional care and competence all those involved must have adequate training, skills and knowledge to conduct and manage investigations and be aware they may be dealing with individuals with diagnosed or undiagnosed mental health illness or issues. Reporting processes must not subject complainants to further harm.

**THOROUGH AND TIMELY INVESTIGATIONS** - investigations must be conducted in a diligent and rigorous manner to ensure that all relevant material and issues are considered, following the principle of natural justice for all parties. Investigations must be conducted as quickly as possible without prejudicing quality, to agreed timeframes, and efficiently to minimise adverse impact on those involved. A number of factors (communication systems, travel, distance etc.) will influence what is a reasonable timeframe. However, as a recommended standard, investigations should be complete (i.e. final report submitted) within 28 days of receipt of complaint, with weekly progress updates to all parties.

**INDEPENDENCE** - it is essential that investigators have no personal or professional interest in the people or organisations implicated. This will require access to a pool of qualified investigators.

<sup>&</sup>lt;sup>9</sup> Adapted by IWDA from the Inter-Agency Standing Committee Task Force on Protection from Sexual Exploitation and Abuse Model Complaints and Investigation Procedures and Guidance Related to Sexual Abuse and Sexual Exploitation 2004

**RESPECT FOR ALL CONCERNED** - including the subject of the complaint. All concerned have the right to be treated with respect and dignity and to be kept informed of the progress of the investigation.

**COMPLIANCE WITH AUSTRALIAN AND NATIONAL LAWS** - in any case in which a crime appears to have been committed, consideration needs to be given to informing national authorities. This can be a very challenging decision if there are doubts as to the integrity of police/legal systems. The decision to inform the authorities should be taken with the agreement of complainants and survivors.

As recommended above, an independent national unit could lead the development and implementation of these standards and tools and ensure that sanctions are enforced for non-compliance.

Recon	Recommendations	
5.1	Best Practice Standards and tools must be developed that ensure confidentiality, safety,	
	independence and respect, legal compliance and allow for anonymous reports.	
5.2	Complainant support must be provided by individuals trained in sexual violence and its	
	impact and all investigations must be thorough and timely.	
5.3	The independent national unit could lead the development and implementation of these	
	standards and tools and ensure that sanctions are enforced for non-compliance.	

### 6. Prohibition of all forms of transactional sex

IWDA recognises that sex work is not inherently exploitative, and that sex workers are not inherently vulnerable. We support all workers, including sex workers, in their right to safe, dignified work, opportunities to establish a livelihood and equal rights in the workplace. We also recognise that the exchange of money, employment, goods, or services for sex in many of the contexts we work in is based on inherently unequal power dynamics and it is appropriate to constrain these transactions.

On this basis, IWDA recommends the revised ACFID Code of Conduct or supporting Quality Assurance Framework, prohibit consensual engagement of sex workers by personnel of member agencies while travelling, on deployment or otherwise conducting business for or representing member agencies.

It is important that regular monitoring and sanctions for non-compliance accompanies this revision to the Code of Conduct or supporting Quality Assurance Framework. In this respect, IWDA notes the submission of forty-four Rape Crisis Organisations in England and Wales and Equality Now, to the International Development Inquiry into Sexual Exploitation and Abuse in the Aid Sector in the United Kingdom<sup>10</sup> calling for:

"all international aid and development organisations put in place a zero tolerance approach by any of its staff, contractors, partners, grantees, sub grantees, agents and consultants to any form of transactional sexual exploitation, including prostitution. Such zero tolerance approach should be properly and regularly monitored and proper sanctions should be implemented for any breach. Any government funding should be contingent on such policies being in place and enforced."

<sup>&</sup>lt;sup>10</sup>Rape Crisis England and Wales and Europe Equality Now Submission to the International Development Inquiry into Sexual Exploitation and Abuse in the Aid Sector, available at:

http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/international-developmentcommittee/sexual-exploitation-and-abuse-in-the-aid-sector/written/86765.html

Recor	Recommendations	
6.1	Revise the ACFID Code of Conduct or supporting Quality Assurance Framework to prohibit	
	consensual engagement of sex workers by personnel of ACFID member agencies whilst on	
	deployment, traveling for, conducting business for or representing member agencies.	
6.2	Regular monitoring and sanctions for non-compliance must accompany this revision to the	
	Code of Conduct or supporting Quality Assurance Framework.	

### 7. Prohibit non-disclosure agreements

Non-disclosure agreements effectively serve to exonerate perpetrators and can contribute to new abuses continuing in new contexts, with impunity. The International Development Inquiry into Sexual Exploitation and Abuse in the Aid Sector in the United Kingdom found that lack of rigour in reference checking and difficulty in navigating privacy concerns allowed individuals who had admitted to sexual abuse and misconduct to move to new positions in the sector.<sup>11</sup>

IWDA recommends the revised ACFID Code of Conduct or supporting Quality Assurance Framework, include a prohibition on organisations using non-disclosure agreements to settle cases of sexual harassment, abuse, misconduct and exploitation as this practice directly contributes to under-reporting, survivor lack of confidence in reporting systems, and lack of accountability of perpetrators.

IWDA supports the use of a "privacy waiver", where candidates agree that their previous employers disclose certain information to the prospective employee where it relates to sexual harassment, abuse, misconduct and exploitation. We also support a system of financially viable passporting, registration or accreditation of humanitarian and development personnel (including volunteers) and recommend the ACFID and DFAT reviews consider these practices.

The Disability Worker Exclusion Scheme currently in place in Victoria provides a valuable model and lessons for how such a scheme may be implemented within our sector. The Disability Worker Exclusion Scheme works to exclude from employment, those who have been identified as posing a risk to the safety and wellbeing of people with a disability. Those who are found to be unsuitable are placed on the List and prevented from obtaining further employment in disability services with the Department or a disability service provider. The scheme works via an additional mandatory pre-employment check and is supported by an on-line portal.<sup>12</sup>

Recon	nmendations
7.1	ACFID Code of Conduct or supporting Quality Assurance Framework includes a prohibition on the use of non-disclosure agreements to settle cases of sexual harassment, abuse, misconduct and exploitation.
7.2	Privacy waivers are used where candidates agree that their previous employers disclose certain information to the prospective employee where it relates to sexual harassment, abuse, misconduct and exploitation.

 <sup>&</sup>lt;sup>11</sup> United Kingdom Government (2018), 'Employment Practices', 8<sup>th</sup> Report-Sexual Exploitation in the Aid Sector <a href="https://publications.parliament.uk/pa/cm201719/cmselect/cmintdev/840/84010.htm#\_idTextAnchor080">https://publications.parliament.uk/pa/cm201719/cmselect/cmintdev/840/84010.htm#\_idTextAnchor080</a>

<sup>12</sup> Victorian State Government (2018), Disability Worker Exclusion Scheme available at: <a href="https://providers.dhhs.vic.gov.au/disability-worker-exclusion-scheme">https://providers.dhhs.vic.gov.au/disability-worker-exclusion-scheme</a>

7.3	A system of financially viable passporting, registration or accreditation of humanitarian
	and development personnel (including volunteers) is considered. The Disability Worker
	Exclusion Scheme may provide a useful model for this system.

### **Summary of Recommendations:**

1.1	Establishment of an independent national unit within the development sector to respond
	to, track and support reporting of sexual harassment, violence or exploitation.
1.2	Support appointment of an International Ombudsmen to investigate and address
	complaints made by international staff and community members.
1.3	All ACFID member agencies ensure a focus on strengthening community-based complaints
	mechanisms.
1.4	A requirement is introduced that all ACFID member agencies must report serious
	complaints to the independent national unit.
2.1	Ensure that a survivor centred approach is central to action to prevent sexual misconduct
	in the Australian sector and is at the core of responses to sexual exploitation, abuse and
	harassment.
2.2	Basic standards developed by UN Women in implementing a survivor centred approach
	should be applied in the development of all policy, guidelines, tools and action taken in
2.1	response to sexual exploitation, abuse and harassment.
3.1	Donors utilise opportunities, such as the upcoming International Safeguarding Summit, to develop core principles and to coordinate compliance and reporting requirements.
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3.2	Consideration is given to international best practice such as the approach by the Danish
5.2	Government to fund independent Core Humanitarian Standards verification or
	compliance.
4.1	Continue to support an integrated approach to implementing safeguarding approaches
	and reporting to reduce administration burdens for small to medium sized organisations.
4.2	Ensure this integrated approach recognises the different needs and vulnerabilities of at
	risk groups including children and people living with a disability.
5.1	Best Practice Standards and tools must be developed that ensure confidentiality, safety,
	independence and respect, legal compliance and allow for anonymous reports.
5.2	Complainant support must be provided by individuals trained in sexual violence and its
	impact and all investigations must be thorough and timely.
5.3	The independent national unit could lead the development and implementation of these
5.5	standards and tools and ensure that sanctions are enforced for non-compliance.
6.1	Revise the ACFID Code of Conduct or supporting Quality Assurance Framework to prohibit
0.1	consensual engagement of sex workers by personnel of ACFID member agencies whilst on
	deployment, traveling for, conducting business for or representing member agencies.
6.2	Regular monitoring and sanctions for non-compliance must accompany this revision to the
	Code of Conduct or supporting Quality Assurance Framework.
7.1	ACFID Code of Conduct or supporting Quality Assurance Framework includes a prohibition
	on the use of non-disclosure agreements to settle cases of sexual harassment, abuse,
	misconduct and exploitation.
7.2	Privacy waivers are used where candidates agree that their previous employers disclose
	certain information to the prospective employee where it relates to sexual harassment,
	abuse, misconduct and exploitation.

7.3	A system of financially viable passporting, registration or accreditation of humanitarian
	and development personnel (including volunteers) is considered. The Disability Worker
	Exclusion Scheme may provide a useful model for this system.

#### Background Documents:

United Nations Secretary-General's Bulletin on Special Measures for the Protection from Sexual Exploitation and Sexual Abuse 2003/13

IASC Draft Model Complaints and Investigation Procedures and Guidance Related to Sexual Abuse and Sexual Exploitation, March 2004

Building Safer Organisations (BSO) Guidelines: Receiving and Investigating Allegations of Abuse and Exploitation by Humanitarian Workers. BSO project, December 2006

BSO Handbook: Training Materials on Receiving and Investigating Allegations of Abuse and Exploitation by Humanitarian Workers. BSO project, December 2006

PSEA Implementation Quick Reference Handbook, CHS Alliance.

Best Practice Guide, Inter-Agency Community-Based, Complaint Mechanisms, Protection against Sexual Exploitation and Abuse (2016 Inter-Agency Standing Committee (IASC))

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