

 **Checklist for Implementers**

 Addressing Incidents and Allegations of Sexual Exploitation, Abuse and Harassment

When an allegation or incident of sexual exploitation, abuse or harassment (SEAH) occurs, every step of the response process should prioritize the well-being and autonomy of the victim/survivor. It is critical to involve them in decision-making, prioritize their safety and support needs, and maintain their confidentiality and privacy to the greatest extent possible. This checklist[[1]](#footnote-2) outlines steps to ensure that a response to an incident or allegation of SEAH is centered on the victim/survivor.

## Response readiness

* Prepare and maintain the essential resources and information needed to support a rapid, safe and appropriate response in the event of an incident or allegation of SEAH.
* Assign a designated focal point or team trained and briefed on their role to manage SEAH allegations confidentially and sensitively.
* Establish what specific victim/survivor services are available and accessible. Identify priority mental health and psychosocial support services, medical services for those recovering from gender-based violence (including emergency services), legal services, and basic needs/protection services.[[2]](#footnote-3)

## Responding to a disclosure

* Take the allegation seriously. Assess and address any immediate safety concerns of the victim/survivor.
* Inform the victim/survivor of their rights and the support services that are available to them.
* Respect the wishes of the victim/survivor regarding their level of involvement and confidentiality.
* Provide clear information about the process and the steps that will be taken to support their recovery and address the allegation.
* Consider the need for administrative leave for the subject of the allegation.

## Victim/survivor support measures

* Conduct a risk and needs assessment[[3]](#footnote-4), considering the need to:
* Facilitate access to emergency medical care, including paying for the required services. Forensic examinations may also be necessary.
* Ensure that the basic and immediate needs of the victim/survivor are met, such as safe shelter, adequate food and clothing, and other critical components of safety and protection.
* Develop a safety plan, if necessary.
* Provide emotional support and access to psychological services.
* Provide information on legal support, as well as assistance to file a legal complaint, if desired.
* Provide ongoing support throughout the investigation process. Continue support after the investigation if the victim/survivor expresses an ongoing need.
* Create an individual case management plan together with the victim/survivor. This should specify what services and other supports are needed, and who is responsible for providing the support. Schedule regular check-ins to monitor progress, and allow for adjustments to the plan.

## Reporting and accountability

* Immediately report the SEAH allegation to the Global Fund, as per the Code of Conduct obligations.
* Comply with local laws and reporting requirements, such as notifying relevant authorities.
* Cooperate with law enforcement agencies, as appropriate, while prioritizing the consent of the victim/survivor.
* Take appropriate disciplinary action, including termination of employment if and when allegations are substantiated.
* Communicate transparently with stakeholders, respecting the anonymity of victim/survivors.

## HR support

* Follow internal HR policies and procedures for handling allegations.
* Maintain strict confidentiality and protect the privacy of all parties during an investigation.
* Implement measures to prevent retaliation against the victim/survivor or any witnesses, including temporary suspension with pay or reassignment, as appropriate.
* Provide support and counseling to staff involved in the case, as appropriate.

## Investigations

* Ensure that the investigation is prompt, thorough and impartial.
	+ Use trained professionals that can conduct trauma-informed[[4]](#footnote-5) investigations, guided by victim/survivor-centered approaches.
	+ Seek guidance and support from experts, such as trauma-specialized service providers and investigators, to ensure a victim/survivor-centered approach at every step.
* If the organization does not have the capacity to undertake the investigation in a victim/survivor-centered and trauma-sensitive manner, engage a trained and experienced external investigator who is able to:
	+ Interview the victim/survivor in a sensitive and supportive manner, guided by trauma-informed approaches that avoid re-traumatizing or causing further harm.
	+ Identify and interview any witnesses or individuals with relevant information.
	+ Collect and preserve evidence while respecting the consent and autonomy of the victim/survivor.
	+ Document findings, maintain confidentiality and adhere to legal requirements.
1. All PSEAH guidance should be read and understood as complementing the binding PSEAH safeguarding and response requirements / expectations, as set out in Grant Agreements and/or any other applicable binding legal agreement terms, including codes of conduct and policies incorporated by reference. In the event of any inconsistency, the Global Fund Grant Agreement solely controls with respect all relevant and legally binding terms or obligations, and the Global Fund reserves the right, in its sole discretion, to allow due consideration of any relevant terms in legal agreements or governing laws. [↑](#footnote-ref-2)
2. Refer to the Service Mapping Guidance for details on how to establish what victim/survivor services are available and accessible. [↑](#footnote-ref-3)
3. The Victim/Survivor Support Services Needs Assessment Form can support this exercise. [↑](#footnote-ref-4)
4. Trauma-informed investigation methods are designed to mitigate the risks of re-traumatization stemming from participation in an investigation. For instance, the investigator deliberately avoids perpetuating any coercive dynamic or revictimization throughout the course of the investigation. Trauma-informed investigators also understand the impact of trauma on the victim’s ability to function as a witness. [↑](#footnote-ref-5)