

**Roadmap to Employment Accountability  
Community of Practice  
June 2021**

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**I. Introduction**

The Employment Accountability Roadmap is a guide for the international development and humanitarian assistance sector to address sexual exploitation, abuse and harassment throughout the employment cycle. Developed by a community practice on employment accountability composed of academics, donors, non-governmental organizations (NGOs), aid practitioners, and related organizations, the Roadmap draws on the experiences and best practices in the aid sector to identify proven models, common challenges and areas for continued learning.

The Employment Accountability Roadmap includes five key thematic areas: (1) Capacity Building; (2) Human Resources; (3) Investigations; (4) Legal; and (5) Risk Management. Within these thematic areas, the Roadmap builds a business case, outlines roles and responsibilities, identifies common challenges and recommends standard practices. The Roadmap seeks to ensure survivor-centered approaches are integrated throughout all aspects of the employment cycle and identifies concrete measures that the sector can take to do so.

The Roadmap also highlights opportunities for continued collaboration and learning on topics of employment accountability and examples from members of the community of practice. The Roadmap builds on the efforts of the international community with 2018 Safeguarding Summit Commitments and the 2019 OECD Development Assistance Committee Recommendation on Ending Sexual Exploitation, Abuse, and

Harassment in Development Co-operation and Humanitarian Assistance: Key Pillars of Prevention and Response.

**Redefining Risk**

The Roadmap aims to redefine and reframe our collective and organizational approach to risk. Risk considerations often have a central role in mechanisms related to employment accountability and often focus on reputational, legal, and financial risks. Employment accountability requires reframing our approaches to risk to prioritize understanding and addressing risks to people—the communities we work in, the populations we seek to serve, and our colleagues. Organizations across the aid sector can take steps to redefine risk at the organizational level, as well as collectively, to build more survivor-centered approaches to employment accountability. Redefining risk will be easier where organizations have introduced an overall risk-management culture that guides everything they do.

The table below outlines old assumptions and opportunities to reframe our approach to risk and employment accountability.

<b>Old Assumptions</b>	<b>Reframing Our Approach</b>
Organizations prioritize legal, reputational, and financial risks. Legal liability drives the response to sexual exploitation, abuse, and harassment.	The risk to the people and communities we serve and our colleagues come first. Expansion of risk to include duty of care and risks that impact people, not only organizations. Individual and organizational risk are not mutually exclusive.
Prioritizing the organization’s reputation ahead of survivor needs and accountability.	Framing reputational risk to center survivors.
Processes centered on the perpetrator.	Fair, transparent, and consistent processes that focus on the survivor.
One-size-fits-all approach to risk.	An understanding of the social and cultural contexts of the communities, power dynamics within the organizations and systems flexible enough to adapt to these contexts.
Reactive approach to risk, only considered when issues arise.	Risk assessments that are proactive and have a prevention focus with meaningful analysis of the underlying factors of risk.
Investigations focus on the individual instance and perpetrator.	Investigations consider factors beyond an individual instance of sexual exploitation, abuse, or harassment, to make recommendations that can address deficiencies, processes, and mitigation measures.

Risk management is the responsibility of one individual within the organization.	Risk management is an organization-wide responsibility. Risk assessment, mitigation, and monitoring is a dynamic process and should incorporate feedback from a range of people, in particular the people we serve.
Assume that no reports of sexual exploitation, abuse, or harassment is positive and that no action needs to be taken.	Operate under the assumption that sexual exploitation, abuse, and harassment is occurring and make efforts to mitigate risks. Welcome reporting as a signal that systems are working. Reporting burdens the victim/survivor: we need to shift the focus to empowerment.
Silo risk management as a static function to be assessed once at the beginning of a project.	Implement a learning approach to risk management—and integrate this across your operations—each of the elements should connect and build on to each other. Consider risks during program design and throughout implementation. Integrate due diligence—including background checks and disclosures.
Leadership focuses solely on avoiding organizational and legal risks.	Leaders recognize the various types of risk and the importance of prioritizing risks to people, and in particular survivors, for abuse.
Sharing information on abusive staff is a major risk.	The risk to our organizations is around employing abusers. Collaboration, transparency, and sharing of data to prevent the circulation of bad actors.
No action needs to be taken if the allegation is not substantiated or if there are not specific details or a survivor report.	With challenges around substantiating allegations in challenging environments, action should be taken in response to allegations, including taking efforts to mitigate risks, protect survivors and assess internal control measures.
Organizations are individually responsible to support survivors.	Inter-agency cooperation and engagement with government institutions are necessary to identify referral services.
Local systems, like police, should be avoided when sexual exploitation, abuse, or harassment arises.	Utilize national institutions and human rights framework where safe and appropriate. Many national police have survivor support centers.
Organizations mitigate their own risks by transferring risks to other organizations, community members, and survivors.	The sector works collaboratively with communities and survivors to reduce overall risk to communities and survivors.

## ***Survivor-Centered Approaches***

Being survivor-centered and accountable as an organization are intrinsically linked. Organizational and reputational interest should not override those of the survivors and better engagement, collaboration, systems and processes are needed to make accountability mechanisms more survivor-centered. This is important to build further trust between organizations, survivors and their communities. At the same time, organizations need to take into consideration survivors' interests with other legitimate rights, obligations, and interests. For instance, there are the rights of survivors and complainants versus the rights of the accused to a fair hearing, or the duty to protect other at-risk groups versus the wish of a survivor to not report. The following practices should be considered:

- Local communities, organizations, and survivors should be involved in defining survivor-centered mechanisms, identifying risks and prevention measures. In this context, more actively sourcing feedback from beneficiaries, working with local associations representing groups of those at risk of SEA, and more participatory research that includes consultation with survivors or those at risk are important. This is especially crucial in order to set up safe, confidential and trusted community-based SEAH reporting mechanisms.
- Increased collaboration and coordination among different organizations can bolster referral pathways and services such legal, financial, medical, and psychosocial support. In order to strengthen the support mechanisms, access and referrals to support services should be available regardless of a formal report or investigation: this includes funding for such services. Further leveraging and building upon the existing work around SGBV can serve as an important entry point here.
- Survivor considerations should be integrated at every level of organization's policies and processes—from high-level policies to implementation—and systematically evaluated to keep survivor needs at the forefront. Where other policies are inconsistent, they should be changed. A survivor centered approach needs to be an embedded strategy, not just separate ad-hoc measures taken by the organization.

## **II. Thematic Areas**

### ***Capacity Development***

Employment accountability requires the efforts of the entire international development and humanitarian assistance sector to appropriately prevent and respond to sexual exploitation, abuse and harassment. Building capacity amongst organizations, particularly small or new ones, strengthens protections across the entire sector for staff, survivors and community members. Sexual exploitation, abuse and harassment undermine the effectiveness and implementation of programs and the organization's

purpose. Capacity building extends beyond training and training must be accompanied by other actions. There are many considerations to build capacity including:

- Work closely with implementing partners to ensure they also have sufficient capacity to identify and manage SEAH risks and to address and respond to SEA appropriately.
- Understanding the local context and conditions by engaging with the communities and through monitoring and evaluation efforts.
- All project activities delivering services at community level should have a component of awareness-raising around beneficiary rights and entitlements to help prevent the misuse of aid for the purpose of sexual exploitation and abuse.
- Learn from cases and examples from other organizations to build and improve prevention and response measures.
- Hold conversations within the organization on defining results, framing results within considerations for methods, ethics and protections from sexual exploitation, abuse and harassment.
- Inclusion of safeguarding protections and considerations in requests for proposals and in funding proposals.
- Integrate safeguarding responsibilities across all staff and align safeguarding principles with other good organizational practices.
- Donor coordination and engagement to support capacity building and encourage reporting and conversations to address safeguarding issues.
- Senior leadership is responsible and accountable for strengthening organizational capacity.
- Independent or external reviews, consultations, outreach to stakeholders and former employees to assess potential systemic issues.
- Organization-wide training on safeguarding topics.
- Have high level in-house champions able to speak about these issues to foster a culture of openness.
- Reward and profile those who have had the courage to speak up about misconduct, with their consent.
- Intentionally promote greater engagement and trust building with communities and partners, beyond focus on deliverables, compliance box-checking and individual trainings to a holistic system.
- Understand the power, structural and cultural dynamics of the communities and the organizations.
- Build transparency and trust within your organizations, the communities, and the sector.
- Build awareness in communities, including through local entry points and trusted voices and by adapting messaging and mechanisms to each context.
- Building on locally driven initiatives by civil society organizations in the countries where we work vs. a presumption that donors and implementing must create capacity in the absence of local expertise.

- Integrating capacity building between GBV and SEA. Consequences are the same for the victims and needs to be addressed in a more holistic manner.

The aid sector is composed of a broad range of organizations of various sizes, experiences countries and structures and a strong system of employment accountability necessitates coordination across these diverse systems. Organizations with limited resources, including small organizations, need dedicated staff to address topics of accountability, which requires understanding of the local context. Organizations often focus policies and responses on liability, reputational concerns and organizational protections, and shifting that emphasis improves the organization's operations, policies, procedures, survivor support.

### ***Human Resources***

Human resources is involved throughout the entire employment cycle and represent key opportunities for accountability measures. Human resources is a singular space that requires coordination across multiple offices and departments through training, hiring, performance appraisals and referencing processes. In order to facilitate cultural change within an organization, human resources require support, focus and resources. Throughout the employment cycle, there are important checkpoints including:

- Job position descriptions that reflect the importance of safeguarding within the organization and the standards of conduct required of its staff.
- Recruitment focused on diverse candidates.
- Self-certification, interview and referencing questions to determine any past history of misconduct for further consideration.
- Performance appraisal processes that include measures to hold staff accountability for safeguarding and safe workplace environments.
- Regular trainings and engagements with staff on their roles, responsibilities, protections, and rights.
- Utilize sector-level mechanisms to address employment accountability collectively, including the Misconduct Disclosure Scheme (MDS).
- Ensure the recruitment/hiring process involves a personal discussion about the Code of Conduct/standards and the consequences of breaches by HR or the manager/supervisor of the new employee. This should include the responsibility of all employees to speak up about wrong-doing and of all managers to respond to concerns raised.
- Thorough investigations that mitigate issues early on and are used to improve the organization's mechanisms and policies.
- The provision of complete references for former staff.
- Trend analyses used as a benchmark for staff and leadership to identify and respond to vulnerabilities and areas of improvement.
- Regular climate assessments to gauge system effectiveness amongst staff.

- Proper allocation of funding and resources to support human resources departments.
- Shared responsibility and communication at every organizational level to promote adherence, support, and overall protection.
- An established mechanism to bring together key stakeholders and drive accountability.
- Include a check of police register as part of the background check in the recruiting process.
- An interdepartmental approach to HR to ensure a comprehensive system for prevention and response to incidents.
- Development of a safeguarding action plan and soliciting and encouraging feedback from all levels of the organization, including the field.
- Creating standards based on existing organizational core values and strong communication regarding how the organization expects them to be modeled.
- Access to a wide range of training materials.
- Supporting protection risk assessment.
- Consistent communication between the field and HQ.
- Transparency in processes, reports and actions taken.
- Trainings around organizational culture need to be comprehensive, detailed, tailored, both formal and informal. It needs to involve seniors and staff all the way down and up the organization and be consistent, compulsory, and repeated. Organizational cultural change is not solely the responsibility of HR, but something that needs to be driven by everyone in the organization and especially management.

Challenges with human resources include limited oversight and capacity to facilitate organizational change. Current policies and training are rarely evaluated for effectiveness and suitability for the organization and staff. Internal and external reviews or investigations often do not depict the full organizational environment. Although training is effective and an important tool, it does not necessarily offer the momentum needed to change an organization's culture. The legal framework, including data protection and employment protections, are also considerations that impact organizational decision making.

### ***Investigations***

Investigations represent a central component of employment accountability, well-connected to a transparent decision-making process based on the outcomes of investigations. Investigations are often sensitive and complex, with many considerations. Investigations should be survivor-centered, trauma-informed and aware of the local context, beliefs and practices, and investigators must be trained and experienced in these areas. The following investigation practices should be considered:

- Involve integrity teams or boards to assess investigations and identify systemic challenges or gaps.
- Harmonization of policies and procedures to outline key principles of survivor-centered approaches that could be adapted to specific contexts.
- Prepare before cases are reported and incorporate considerations of local laws into investigation procedures.
- Provide clear reporting guidelines and clear accountability to staff, survivors and community members.
- Develop guidance for managers and staff to respond to safeguarding cases.
- Pool resources to access safeguarding specialists.
- Build skills and training for investigators and establish sector-wide standards, including quality assurance for these trainings.
- Encourage and welcome reporting.
- Operationalize the survivor centered approach in investigations. This needs to entail regular communication with survivors and witnesses, including status updates and requests for feedback on the process.
- Investigations should evaluate the environment and enabling factors beyond the individual incident and these patterns should be incorporated into prevention and mitigation efforts, even if the allegation is unsubstantiated.
- Transparency and engagement with survivors that allows the survivor to determine if, when, and how to engage with the investigation throughout the process. The investigation function should also monitor when victims step back after coming forward. This should then be analyzed for trends and inputted into policy.
- Appropriately investigate all cases, despite considerations of potential legal liability.

Investigations are challenging through the entire process. Reports can be perceived as negative, a source for suspicion, and outlier events. There may be the expectation that investigations will lead to dismissals, or other specific actions, or that the outcomes of investigations will be known. However, not all investigations are conclusive or can be substantiated. Investigations focus on the accountability of the perpetrator, but less emphasis is placed on the accountability of the organization to the survivor. Administrative investigations do not replace criminal investigations nor provide complete justice. Investigations may not always be the right path for the survivor and should be complementary to other mechanisms for response, including survivor support.

## ***Legal***

Legal regimes provide the framework for organizations to address employment accountability. Data protection, privacy and labor laws, due process rights and liability are all considerations applied at every point in the employment cycle. Justice, and access to justice, must be framed with a survivor-centered lens. Legal offices can ensure a robust response as well as continuous and adaptive learning to strengthen mechanisms of



employment accountability. Leaders often play a critical role in these processes. Legal analyses can consider:

- Balance the legal responsibilities to address cases and the liability involved in the failure to respond to cases, by prioritizing a survivor centered approach.
- Accommodate the rights of all parties including the alleged victim, alleged perpetrator, witnesses, and whistleblowers.
- Ensure international human rights standards and best practices are observed in relation to all affected individuals. Incidents will occur in jurisdictions with differing levels of individual protections for labor standards, data protection, human rights etc. Often standards will be higher in aid sending countries as opposed to aid receiving countries. To ensure all parties, local or otherwise, are treated fairly by international organizations, the higher standards should prevail.
- Ensure that those who speak up are protected whether they be whistleblowers, victims, witnesses and be aware that the ability to address this problem effectively is severely constrained by retaliation and backlash against those who report.
- Organizational responsibility to prevent harm and ensure effective accountability mechanisms at the country and headquarters level.
- Appropriate employment accountability protocols and internal controls facilitate trust in the organization, demonstrating that an organization can handle the matter independently. The involvement of independent and professional actors in the investigation and decision-making of case helps build transparency and trust in the system. While decision-making should be professional, principled and transparent, it should be strongly linked to management – where the accountability lies. Preparation before a case occurs, including an analysis and framework in place to react quickly and appropriately. Understanding local labor law is critical and local law firms are generally amenable to providing pro-bono legal advice on local law frameworks in anticipation of potential employment related issues arising from humanitarian/development aid work.
- Ensure a framework for referencing is in place to request and provide vetting/reference checks.
- Build an enabling environment to encourage reporting, ensure staff, survivors and communities are aware of their rights, know how to report and inform them of the actions that are taken by the organization to respond to a complaint/incident of misconduct.
- Ensure accessible feedback/reporting mechanisms which are able to handle sensitive complaints are operational in each project/organization.
- Annual verification of organizational standards by each employee, including signing and dating each page of a code of conduct affirmation, for instance by inclusion in the annual appraisal process. This needs to be accompanied with the completion of good SEAH training or a focused Code of Conduct discussion on SEAH with a record in the individual file that it has been completed.

- Reject resignations and/or settlements as a path to quickly remove problematic staff, and instead pursuing full investigations.
- Conduct regular safeguarding audits at the country level.
- Decision-making following an investigation should be done on the merits of the case and the investigation findings and not on the basis of organizational interests. Such decision-making can be strengthened by giving independent actors a say in decisions made.
- Ensure whole supply chain responsibility by including employment accountability obligations in all contracts from the donor down through intermediate organizations to the implementing organization on the ground. There should be a system of oversight and scope for reporting and recourse through to the top of the chain if necessary. Any breaches arising should be seen as a responsibility for all organizations in the chain and not simply those at the bottom.
- Foster transparency by requiring all organizations in receipt of aid funds to report on the efficacy of their complaints system, cases reported and outcomes, on an annual basis in their annual reports and on their websites.
- A data sharing and privacy plan that outlines privacy protections and procedures for transparency.
- Understanding and assessing legal obligations and liability to address concerns and provide additional options for flexibility (i.e. providing an “I cannot answer option” in references).
- Open communication between staff and legal and human resource offices.
- Reframe access to justice with a survivor-centered lens. Justice does not only take the form of retribution and needs to take into consideration full needs and rights of survivors.
- Understanding both the national and local legal structures as well as customary practices.

The legal framework provides an opportunity to assess the relative risks, responsibilities and accountability mechanisms. Refocusing these analyses away from organizational risk toward sector-wide coordination and survivor-centered approaches can present challenges. Data protection, privacy restrictions and employment laws often limit the direct information that is available to survivors.

### ***Risk Management***

Risk management involves assessing and managing the different degrees of risk, with mitigation options and controls to suit, rather than operating with zero risk. Risk is unavoidable, and a more flexible, risk forward stance may allow for organizational growth. Organizations must first consider survivors and the duty of care, over organizational risks, and the aid sector should work to rebalance the risks to support survivors, transparency, and accountability over reputational considerations. Ethics, legal and compliance teams are comfortable with legal and financial risk, but not always trained in risk to members of

development and humanitarian assistance communities. Legal, financial, and reputational risks can be a lever to reframe the conversation while building in safeguarding concepts. Redefining these risks requires:

- Evaluating risk based on people. Reframe the conversation away from focusing just on legal, financial, and reputational risks to look at the people impacted.
- Organizations should have a SEAH risk management policy, a risk appetite statement, and structures for escalating and discussing risk.
- Pattern analyses link risks between sexual exploitation and abuse and fraud and corruption.
- Understanding the connections between the risks to beneficiaries and staff and the harm done without people-focused risk assessments.
- Considering risk and liability beyond lawsuits to account for the full organizational costs (e.g., lost income, inability to achieve mission).
- For embedded structural issues, organizational policies should not reinforce these imbalances but work within these limitations.
- Access to tools and resources for smaller organizations.
- Learning from other types of high-risk areas in our programs (e.g., fraud), in order to build in the proper internal controls to mitigate and respond appropriately.
- Adjust training and messaging priorities to focus on the people affected by our programs.
- Hold leadership teams accountable for managing the risk. Integrate and prioritize accountability across training, messaging, procedures—including tying to performance and the responsibility of the organization. Leaders set the tone, priorities, and climate.
- Ensure managers at all levels are responsible for making their teams aware of expected standards and for responding to any concerns raised as a way of driving change through the system. Managers need to be held accountable including through investigation and disciplinary action for failures in this regard. Standards/codes of conduct need to be living documents. Federated organizations need to take responsibility and accountability within their structures.
- Hold country leadership accountable for maintaining an ethical work environment and for fostering dialogue that leads to an organizational culture based on respect and integrity.
- Mitigating risk using a prevention angle.
- Establish buy-in at the local level, acknowledge issues, risks and establish relationships and trust.
- Community conversations to establish broader accountability and input into the projects and processes to address SEAH.
- Project managers and designers should understand the risk context and address or mitigate them.
- Everyone has the responsibility to address risk and this needs to be embedded and owned at every level.

- Establish key performance indicators related to safeguarding responsibilities.
- Set expectations in position descriptions—particularly for managers.
- Tailor messages to the contexts, including translating into different languages, and ensure comprehension.
- Clearly communicate processes to staff and managers.
- Understand and adjust incentives that may be barriers to addressing SEAH.
- Foster stronger connections with organizations at the local level to design appropriate mechanisms or build on others' examples.
- Development of an Accountability Framework to link issues, define roles and responsibilities, and remove barriers.
- Incorporating SEAH in risk assessments which then inform projects.

The emphasis on certain risks can shape organizational priorities regarding employment accountability, posing challenges in implementing effective measures. This tendency can lead to focus on the wrong risks and assumptions on the existing protections for survivors and alleged perpetrators. Considerations for these risk frameworks may prioritize employment protections over protections for survivors or victims. In addition, the focus on eliminating or severely minimizing risk, as well as on short-term risk and liability considerations over long-term harms can restrict efforts toward accountability. A limited risk framework leads to challenges in employment accountability, limits efforts to response rather than prevention, leading organizations to treat each incident as an individual case without evaluating policies and procedures for constant improvement and consider the absence of reporting a positive signal instead of a system failure. Headquarter level processes and policies may not be accepted within field offices due to actual or perceived inconsistency with the local environment. Risk management efforts struggle to balance due process, protections against false allegations and protections for survivors and prevention of further harm.

### **III. Areas for Continued Learning and Collaboration**

This Roadmap highlights the need for continued learning and collaboration in order to further ensure accountability to survivors and the communities we aim to serve. Further research, evidence gathering, and engagement are all needed to make our approaches more survivor-centered.

- Evidence-based effective and safe reporting mechanisms.
- Strategies for addressing retaliation cases.
- Consultation and engagement with women, girls, and vulnerable populations on safeguarding measures.
- Additional research on structural and systemic factors that promote and reduce sexual exploitation and abuse.

- Stronger linkages between sexual exploitation and abuse and gender-based violence work and further crossover learning between humanitarian assistance and development.
- Identification of key capacities for survivor-centered support in areas and consideration for joint funding.
- Research into restorative justice approaches.
- COVID-19 has had tremendous impacts across the sector and additional research should consider the impact of the pandemic on prevention and response to sexual exploitation, abuse, and harassment.
- Further data on effective capacity building efforts.
- Better methodology for climate assessments.
- Service mapping for survivors.
- Identify how national human rights or ombuds institutions can be leveraged to improve accountability towards survivors.