

IOM is committed to the protection against sexual exploitation and abuse (PSEA) in all its work. Sexual exploitation and abuse occurs when someone providing services and assistance, including IOM staff, partners, and any other associated personnel, abuse their position of power and trust for sexual purposes against a beneficiary (sexual exploitation) or commit an actual or threatened physical intrusion of a sexual nature by force or coercion (sexual abuse).

IOM seeks to prioritise safety and dignity in its programming and to ensure meaningful access, accountability, participation, and empowerment for all individuals it assists. Sexual exploitation and abuse (SEA) can occur in every type of programme where IOM and partners interact with affected populations, and assisted individuals, but each programme has its own set of distinct risks. **This Checklist supports WASH programmes and teams in reducing the risks of Sexual Exploitation and Abuse (SEA) in key sector activities, namely:**

- Design, construction and management of water and sanitation infrastructure
- Distribution of WASH non-food items
- Hygiene promotion

It should be used in conjunction with the **Proposal Development SEA Risk Mitigation Checklist**, the **Beneficiary Registration, Targeting and Selection SEA Risk Mitigation Checklist**, as well as the **SEA Risk Mitigation Checklist for Partnerships** (as applicable), the **Data Management SEA Risk Mitigation Checklist** (as applicable), and the **Cash-based Interventions SEA Risk Mitigation Checklist** (as applicable).

There are important SEA risk considerations in mitigating SEA risk in WASH programming:

1. WASH interventions typically require IOM and associated personnel to maintain proximity with affected communities; interaction involving power differentials creates opportunities for SEA. Careful attention to these risks and implementation of strong risk mitigation measures are therefore necessary to ensure WASH activities are planned, coordinated, and delivered in a safe and dignified manner, avoiding harm to individuals, families and communities.
2. WASH programmes are frequently implemented in contexts of extreme vulnerability, and access to water and sanitation is a basic human right. When programme interventions fail to provide sufficient access to safe WASH, unmet needs increase individuals' susceptibility to SEA. For instance, vulnerable individuals may be compelled to exchange sex for water, material goods, access to sanitation, or protection to survive. Inadequate assistance, combined with the struggle to meet basic WASH (or other) needs, creates opportunities for SEA to occur.
3. Consistent and meaningful community engagement, along with inclusive WASH governance that actively involves various community groups — especially the most vulnerable — in WASH community-level resource management, not only sets a solid foundation for sustainable programming but also promotes more equitable power dynamics, helping to mitigate SEA risks.

If unchecked, SEA can occur during any WASH programming intervention, and be perpetrated by a range of actors, including IOM staff, implementing partners, contractors, third party contracted staff and service providers, as well as community actors supporting WASH activities.

Examples of Sexual Exploitation and Abuse (SEA) situations in WASH programming

1 Design, construction, and management of water and sanitation infrastructure

"I was notified by one of our beneficiaries that some water truck drivers from the company hired by IOM to fill water tanks in the camp have been asking women for sexual favours in exchange for extra water. This is in addition to the normal quantity they are entitled to receive from us."



"IOM's project will install 20 toilets in community X. When we visited the site to conduct a preliminary assessment, I overheard an IOM colleague saying to one of the IDPs that he would place a toilet close to this man's shelter if he let his teenage daughter go on a date with him."

"IOM has rehabilitated a water point in my community and helped to set up a water committee to manage its use by the residents. Male members of the water committee monitor lines at the water point during the day. Some of them have been making sexual comments to young women when they go collect water. Women feel very uncomfortable and unsafe, but they fear that the committee will prevent them from accessing water if they complain about this situation to IOM."



2 Distribution of WASH non-food items (NFIs)



“The IOM enumerator registering people to receive the WASH non-food items (NFIs) distributed by IOM said that he would only add my name to the list if I agreed to have sex with him.”

3 Hygiene promotion



“A member of the IOM hygiene promotion team visited my house while my wife was alone. She asked him to leave but he said he had important information to share about disease control. He then entered our house without permission and made comments to my wife about her body and looks that made her feel very uncomfortable.”

CROSS-CUTTING RISK MITIGATION ACTIONS FOR WASH PROGRAMMING

WHEN?

- 1 Needs assessment¹ and design of intervention.
- 4 Intervention planning and preparation
- 2 Project set-up
- 5 Implementation and Monitoring
- 3 Targeting, registration and selection of beneficiaries²
- 6 After the intervention³

1. Check with HR (and the PSEA Focal Point) that all staff and related personnel involved in the project have been vetted, received mandatory training on PSEA and signed a Code of Conduct.⁴

WHEN? 1 2 3 4 5 6

2. Ensure the project budget includes financial resources for PSEA-specific interventions.

WHEN? 1

! Please consult the **Proposal Development SEA Risk Mitigation Checklist**.

3. At a minimum, ensure all interventions meet basic minimum standards for WASH programming outlined in [SPHERE standards](#). When individuals do not have their basic needs met, they are more susceptible to being sexually exploited in exchange for assistance.

WHEN? 1 2 3 4 5 6

4. When engaging with communities to collect data, register, plan, implement and monitor activities by IOM and partners:

- Ensure gender balance in the recruitment of project staff, especially for frontline positions. Ensure representation of persons with disabilities, and from different ethnic, racial and age groups, etc. This will enhance trust, communication and understanding.
- Deploy gender-mixed teams of enumerators/facilitators/field staff to work in pairs (persons of different genders) or as a team, so that community members are never left alone with one IOM staff, contractor or third party, etc.
- Ensure facilitators/enumerators/field staff interacting with women are women.
- Train field teams on Protection concerns and how to safely handle potential SEA disclosures, including on sharing accurate information on services and/or how to contact the PSEA Focal Point,⁵ and receive information on IOM’s SEA reporting ([We Are All In](#) Platform or OIintake@iom.int).
- Provide field teams with information to carry with them on a) available complaints and feedback channels; b) Protection/GBV services available in the target areas;⁶ c) contact details of the PSEA Focal Point(s).
- Enumerators/facilitators and field staff wear badges and gear with logos at all times (except in contexts where this may create security risks to staff).
- Collect only information that will be used and ensure that appropriately trained staff are the ones collecting the information.
- Put in place data protection measures to restrict access to data.⁷

WHEN? 1 3 4 5 6

! Please consult the **Data Management SEA Risk Mitigation Checklist**.

➤ Please refer to Box A on considerations regarding gender-mixed teams.

1 For detailed guidance on SEA risk mitigation considerations for designing and implementing needs assessments with communities, please refer to the **Data Management SEA Risk Mitigation Checklist (DTM, IM, MandE)**.
 2 For detailed guidance on SEA risk mitigation considerations for beneficiary targeting, registration and selection, please refer to the **Data Management SEA Risk Mitigation Checklist (DTM, IM and MandE)**, and **Beneficiary Targeting, Registration and Selection SEA Risk Mitigation Checklist**.
 3 For detailed guidance on SEA risk mitigation in post intervention/distribution monitoring, please refer to the **Data Management SEA Risk Mitigation Checklist (DTM, IM, MandE)**.
 4 For more information on Human Resources pertaining to PSEA, please refer to section A2 (PSEA HR) of the [IOM’s PSEAH Toolkit and Checklist](#).
 5 For detailed information on steps to safely handle PSEA disclosures, please refer to key messages in Box B below, and Box E of the IOM PSEA Toolkit & Checklist.
 6 For example, field teams can use the **GBV Pocket Guide**.
 7 For reference on how to implement data protection measures, please refer to [IOM Data Protection Manual](#) and [DTM Data Protection Checklist](#).

WHEN?	1 Needs assessment ¹ and design of intervention.	4 Intervention planning and preparation
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5. Consult vulnerable groups (women, persons with disabilities, children, elderly persons, persons with SOGIESC etc.), using appropriate and safe methods,⁸ on their WASH needs and preferences (e.g.: who within the household/family should be the recipient of any WASH items distribution, the most suitable delivery mechanism(s), average family size, specific WASH-related needs such as infrastructure adaptations, increased water needs or specific hygiene products, etc.)

▶ *Work with IOM Protection teams to safely consult with CBOs representing vulnerable groups, including organizations of persons with disabilities and diverse SOGIESC to ensure their needs are met. In restrictive, conservative environments, for instance, where social norms impede access to women and girls, carefully consider risks to their engagement and sensitize key decision-makers in the community on the importance of ensuring these groups can take part in consultations.*

WHEN? 1 4

6. When working with partners:⁹
- All contracts and MOUs signed with implementing partners, service providers, traders, vendors, government counterparts etc. contain PSEA clauses whereby partners commit to mitigate and respond to SEA.
 - All implementing partners involved in the project are assessed for PSEA capacities through the [United Nations Partner Portal](#), a capacity development plan is developed jointly with the partners,¹⁰ and they are supported to meet minimum standards on PSEA.
 - Implementing partners, service providers, traders, vendors, government counterparts are monitored to ensure adherence to PSEA standards and commitments.

WHEN? 2

! **Please consult the *SEA Risk Mitigation Checklist for Partnerships*.**

7. Establish or strengthen safe and accessible complaints and feedback mechanisms, and set procedures for handling SEA complaints (should a SEA complaint be received), including referring survivors to assistance and referring the complaint for follow up and investigation within IOM.¹¹

WHEN? 2

8. Raise community awareness of PSEA using context- and culturally appropriate awareness materials delivered through a range of mediums, for example, posters, pamphlets, radio messaging or communication through community leaders among others. These materials should be socially and culturally appropriate and informed by community needs and preferences. Information should address staff conduct, the fact that aid is free, and how to report misconduct. Make these materials visible and available to beneficiaries and community members in the local language(s), in visual form, or communicate the information orally. Reinforce this message consistently throughout the activity.

WHEN? 2

9. Ensure that the targeting criteria are set with the participation of key community stakeholders, including (representatives of) vulnerable groups. Once set, targeting criteria for beneficiary selection are widely communicated, understood, and endorsed by the community.

▶ *Prior understanding of the community dynamics, and how decisions are made in the context, is key for ensuring a safe, inclusive and meaningful beneficiary selection process. If existing structures are representative and credible, or leaders are open to adapting processes to be more inclusive and equitable, their involvement in beneficiary selection decisions is beneficial.*

WHEN? 3 4

! **Please consult the *Beneficiary Targeting, Registration and Selection SEA Risk Mitigation Checklist* for detailed guidance.**

10. Concerning registration and selection of beneficiaries:
- Consider having one team who registers individuals and a separate team verifying registration and coordinating the selection of beneficiaries.
 - Enumerators explain to community members during registration that they are not responsible for beneficiary selection and therefore cannot influence decisions or add names to lists.
 - Where feasible, create automated/digital systems to select beneficiaries, based on the set eligibility criteria to help mitigate risks associated individuals responsible for beneficiary selection soliciting sexual favors in exchange for inclusion on the list.

⁸ For further information, please refer to [DTM Methods and Sources for Data Collection](#).

⁹ For more information on PSEA inclusion into partner agreements, please refer to section B1 (*Working with partners on PSEA*) of [IOM's PSEAH Toolkit and Checklist](#).

¹⁰ For reference, see: [Sample Template for Action Plan on PSEA.docx - Google Docs](#)

¹¹ For more information on complaints and feedback mechanisms, please refer to section B3 of the *IOM PSEA Toolkit & Checklist*.

WHEN?	1 Needs assessment ¹ and design of intervention.	4 Intervention planning and preparation
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- Contact Protection/Child Protection actors/specialists if considering targeting vulnerable children (e.g.: separated or unaccompanied children, children-heads of household) and other vulnerable groups, to assess risks and explore suitable options.
- Restrict access to databases containing individuals' information to those who need it.

WHEN? 3

11. When registration and selection is done by implementing partners or other third parties (e.g. government, community leaders, etc.), the same risk mitigation measures as IOM should be implemented (as per guidance immediately above).

Ensure IOM gender-mixed IOM teams monitor or verify the registration, and sign a *Memorandum of Understanding* (MOU) with the entity conducting the registration to ensure data protection is in line with IOM standards.¹²

WHEN? 3

12. On identity verification, or setting required IDs for registration:

- Consult communities including vulnerable groups to identify existing identification documentation options and risks associated with obtaining identification documents.
- Whenever possible, accept multiple types of identification documents (e.g.: national IDs and passports, stamps, unique identification numbers, QRs, fingerprints, etc.)

! Please consult the **Cash-based Interventions SEA Risk Mitigation Checklist**.

WHEN? 3 4 5

13. After selection, explain to beneficiaries why they were chosen to receive assistance.* To minimize SEA risks linked to potential exclusion of certain individuals/groups:

- Emphasize indirect benefits stemming from the project in messaging disseminated to the community.
- Explore synergies with complementary programmes and activities that may benefit other (vulnerable) groups or the community at large.

*Use different communication methods to ensure messaging is disseminated in a manner and language individuals/groups understand and that message reaches them effectively, especially the most vulnerable groups.

WHEN? 3 4

14. Plan activities during times and at locations that are safe, appropriate and convenient for participants, especially the most vulnerable groups/individuals. Provide beneficiaries with clear information on the assistance that will be provided, as well as date, time and location of activities.

➤ Consider information access differentials among the various target/vulnerable groups and ensure message dissemination methods are appropriate to them (e.g.: women, persons with disabilities, etc.).

WHEN? 4

15. Consultations are held with communities and beneficiaries on needs and preferences to inform planning and design of activities.

WHEN? 4

16. Ensure appropriate, transparent management of both free and paid WASH facilities and services; communicate clearly to the communities about entitlements, what services/materials are free, and which should be paid and the cost (as applicable).

WHEN? 4 5

17. Deploy gender-mixed and diverse teams of monitors to conduct observational audits of activities and flag any potential Protection/GBV/SEA risks.¹³

WHEN? 5

➤ Consider undertaking joint periodic site visits with PSEA /GBV/Protection staff.

¹² See: [IOM's Data Protection Principles and Manual](#).

¹³ Monitors can work with a standardized observational audit tool; for an example of safety audit tool that can be customized for Shelter and Settlements programmes, please refer to: [Empowered Aid Toolkit](#), Annex 1.

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18. Direct individuals who wish to express grievances (e.g.: about the beneficiary selection process, the assistance provided, etc.) to the available complaints and feedback mechanism.

WHEN? 1 3 4 5 6

19. If problems or issues arise during field activities and involve women community members/beneficiaries, these are handled by more than one person, and in the presence of a woman staff member if the beneficiary is a woman.

WHEN? 1 3 4 5 6

20. At a reasonable interval, conduct post-distribution/monitoring/beneficiary satisfaction exercises that include questions that help identify red flags related to exclusion and unintended Protection/SEA risks,¹³ as well as aspects such as beneficiary feedback on conduct of staff and partners, and intervention safety (including after the assistance is received).

WHEN? 6

➤ Always consult AAP/Protection/GBV/PSEA specialists within IOM to discuss appropriateness of approaches and questions/tools before data collection.

BOX A: CONSIDERATIONS ON GENDER-MIXED AND DIVERSE TEAMS

Programmes should take concrete steps to engage women as frontline workers, enumerators, or facilitators as part of SEA risk mitigation measures. However, meeting these requirements may be challenging in settings where context-specific cultural and security barriers exist. In such cases, consider the following options:

- o Collaborate with other IOM teams (e.g.: Protection) within the operation that can volunteer women staff members to support these activities that involve close interaction with community members, especially vulnerable groups.
- o Engage women-led local/community-based organizations, committees and groups to provide support and/or monitor such activities.

For activities involving data collection, consult the Protection/GBV/SEA specialist in your operation and contact the **Protection Information Management Field Support Network** (PIM-Support@iom.int) for guidance on safe and viable alternatives that can be explored in your context.

BOX B: KEY STEPS IN RESPONDING TO A COMPLAINT OF SEXUAL EXPLOITATION AND ABUSE (SEA)

1. Ensure SEA survivor gets the assistance they need

- Address **urgent needs** immediately, including medical and safety.
- Find a **safe location** for you and the survivor to speak.
- Explain **mandatory reporting** to the survivor: if the survivor tells you that an IOM/ any aid worker committed SEA, you have an obligation to report to your organization; give the survivor the option of choosing if they want their personal information to be included in the confidential report to investigators or not.
- Inform the survivor about **available services** - know who your **service providers** are (Health, Safety, MHPSS) and use GBV/CP/Protection **referral pathway**, if there is one.
- Ensure **informed consent** when referring to services: ensuring that a survivor agrees to access services on the basis of their having full information, including risks and benefits; them being competent to decide; and no coercion, threats or promises of benefits being used to secure that consent.
- Remind the survivor they can **seek services later**.

2. Report through existing mechanisms

- IOM's [We Are All In](#) Platform or OIOintake@iom.int
- In case you need further support, contact your PSEA Officer or Focal Point.

¹³ Monitors can work with a standardized observational audit tool; for an example of safety audit tool that can be customized for Shelter and Settlements programmes, please refer to: [Empowered Aid Toolkit](#), Annex 1.

BOX C - Specific SEA Risk Mitigation Measures for Distribution of WASH material

1. Distribution times are safe for assisted persons to travel to the distribution point and return home during daylight hours.
2. Distribution held in easy-to-reach and safe location with open and safe spaces, limited physical barriers, not right next to busy roads and highways, etc.
3. Priority and gender-specific lines provided at distribution. These could be for elderly people, women with children, pregnant/lactating women, persons with disabilities, persons with diverse SOGIESC etc.
4. Distribution design and implementation is respectful and inclusive of cultural and religious practices while prioritizing safety and dignity of all affected persons.
6. Options exist for vulnerable persons (e.g., persons with disabilities who cannot access the distribution point, elderly, child-headed households, etc.) to register a trusted individual to collect the material on their behalf.

BOX D - Specific SEA Risk Mitigation Measures for Hygiene Promotion

1. Ensure that all volunteers involved in hygiene promotion activities signed a code of conduct and received mandatory training on PSEA.
2. Engage all community segments, particularly women, girls, and vulnerable groups, in planning hygiene promotion activities to address their needs and perspectives. This may include through women`s groups and other community-based organizations.
3. Ensure hygiene promotion messages are gender-sensitive, culturally relevant, and inclusive, so they resonate with diverse community members. Broad outreach ensures information reaches those who most need it, preventing it from being controlled by a few individuals and thus mitigating the risk of it being leveraged for SEA.
4. Whenever possible, engage with PSEA Officer/Focal Point in the operation to explore suitable options for integrating PSEA awareness into hygiene promotion activities.
5. Ensure that hygiene promotion activities are held in safe and accessible locations. Avoid isolated or poorly lit areas and consider the safety of participants.

BOX E – USEFUL RESOURCES

- [IOM's PSEAH Toolkit and Checklist](#)