CASH-BASED INTERVENTIONS

SEXUAL EXPLOITATION AND ABUSE (SEA) RISK MITIGATION CHECKLIST

IOM is committed to the protection against sexual exploitation and abuse (PSEA) in all its work. Sexual exploitation and abuse (SEA) occurs when an IOM worker or partner facilitating access or providing services and assistance, abuse their position of power and trust to sexually abuse and/or exploit communities and beneficiaries.

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 workers and partners interact with affected communities, and assisted individuals, but each programme has its own set of distinct risks. There are important SEA risk considerations for activities involving cash-based interventions, as they often require close interaction with communities, especially vulnerable individuals, creating opportunities for SEA. *This Checklist supports IOM workers in preventing, mitigating and responding to SEA in cash-based Interventions* (CBI); it should be used in combination with the *Proposal Development SEA Risk Mitigation Checklist,* the *Beneficiary Registration, Targeting & Selection SEA Risk Mitigation Checklist*, as well as the *SEA Risk Mitigation Checklist for Partnerships* (as applicable), and the *SEA Risk Mitigation Checklist for Data Management* (as applicable). For more information regarding existing sectoral SEA Risk Mitigation Checklists, contact IOM's global PSEAH unit at PSEAH-SH@iom.int.

In CBI, SEA can occur at different stages of the activity and be perpetrated by a range of actors, including IOM staff, implementing partners, traders, government counterparts, financial service providers, as well as community actors supporting the activity.

Examples of sexual exploitation and abuse (SEA) situations in cash-based interventions (CBI)

"One of the IOM staff organizing a focus group discussion that I participated in texted me after the meeting and said he would share the things I said during the meeting with others in the community if I did not agree to go on a date with him".

1 **Initial assessment informing the design of the CBI**

2 **Targeting, registration and selection and of beneficiaries**

"A neighbour told me that an IOM staff involved in the registration said he would only register her family if she agreed to be touched inappropriately by him".

"During the distribution, the staff said that he would only explain how the ATM card works if I agreed to have sex with him".

"I only received information regarding the date and time of the distribution after I accepted to kiss the community leader who was helping IOM to organize this distribution in the camp. I heard he is doing this with other women in the community".

"I was told that the clerk at the bank flirted with a beneficiary when she went to collect her transfer and he has been harassing her since then".

3 **Distribution planning**

4 **When collecting the assistance**

"The shop owner told some women that their data was not shared by IOM and that they should come see him in private to resolve the situation so they could get their assistance. He then made sexual advancements towards them during these meetings".

"The enumerator visited my house when my wife was alone and made sexual comments to her".

5 **When redeeming vouchers**

6 **Post-distribution Monitoring**

RISK MITIGATION ACTIONS FOR CASH-BASED INTERVENTIONS

📝 NEEDS ASSESSMENT[1] & DESIGN OF CBI

1. Check with HR (and the PSEA Focal Point) that all staff and related personnel involved in the assessment have been vetted, received mandatory training on PSEA and signed a Code of Conduct[2].

2. When collecting data from communities:

   - Deploy gender-mixed teams of enumerators and facilitators.
   - Enumerators/facilitators work in pairs (women and men).
   - Facilitators/enumerators/note-takers interacting with women are female.
   - Field teams receive information to carry with them on: a) available complaints and feedback channels; b) Protection/GBV services available in the target area;[3] c) contact details of the Gender-Based Violence (GBV), Child Protection (CP) and PSEA Focal Point(s).
   - Field data collection teams are trained 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[4], and receive information on IOM´s SEA reporting channels (*We Are All In* platform and OIOintake@iom.int).

   - Enumerators/facilitators and other relevant staff wear badges and any other gear with logo at all times (except in contexts where this may create security risks to staff).
   - Collect only information that will be used to plan/design the intervention.
   - Restrict access to data by putting in place data protection measures.[5]
   - Enumerators/facilitators provide information on PSEA and on existing complaint and feedback mechanisms (CFMs).

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

📝 PROPOSAL DEVELOPMENT[6]

1. Resources are allocated to PSEA under the activity´s budget.

   > *For further guidance, please consult the Proposal Development SEA Risk Mitigation Checklist.*

2. When designing the intervention, if possible, prioritize delivery mechanisms and distribution methods that minimize the need

   for direct contact between project implementers (e.g., IOM staff or IOM partner staff) and beneficiaries (e.g., use bank transfers that enable funds to be withdrawn from ATMs or mobile money).

   > ⚠ *Whenever possible, refrain from distributing cash in hand!*

🔄 PROJECT SET-UP

1. Check with HR (and the PSEA Focal Point) that staff working in the CBI project have been vetted and screened through ClearCheck by HR, received mandatory training on PSEA and signed a Code of Conduct.[7]

2. When working with partners[8]:

   - All contracts and Memorandum of Understanding (MoU) signed with implementing partners, (financial) 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 have been assessed for PSEA capacities through the United Nations Partner Portal, a capacity development plan is developed jointly with the partners[9], and they are supported to meet minimum standards on PSEA.

   > ⚠ *For assistance on assessing the PSEA capacity of your partners, contact IOM's PSEA Focal Point in your mission and/or IOM's global PSEAH Team (PSEA-SH@iom.int).*

2. Community awareness of PSEA is raised in a manner that is both context and culturally- appropriate. Awareness materials (such as posters and pamphlets), are informed by community needs and preferences, on staff conduct and that aid is free, and how to report misconduct are visible or handed out to beneficiaries/community members in the local languages, in visual form, or communicated orally to beneficiaries/community members throughout to the activity.

3. Safe and accessible complaints and feedback mechanisms have been established or strengthened, and have procedures in place for handling SEA complaints, including referring survivors to assistance and reporting SEA using IOM's reporting channels (We Are All In platform and OIOintake@iom.int)[10].

TARGETING, REGISTRATION & SELECTION OF BENEFICIARIES[11]

1. When registration is conducted by IOM, one team is assigned to register individuals and a separate team is assigned to verify registered individuals and select beneficiaries.

> ⚠️ *To uphold process integrity and independence, and mitigate SEA risks, automated/digital systems to select beneficiaries, based on the set eligibility criteria, should be preferred whenever possible.*

2. Ensure that the targeting criteria is discussed and set with the participation of key community stakeholders, including influential individuals and (representatives of) vulnerable groups. Once set, targeting criteria are widely communicated, understood and endorsed by the community, and the message is reinforced throughout the activity.

3. When CBI is used to contribute to Child Protection (CP) outcomes, it must be conducted under the leadership and monitoring of Child Protection teams or actors[12].

> ⚠️ *When considering targeting vulnerable children (e.g.: separated or unaccompanied children, Child-Headed Households), first contact CP actors in your area to assess risks and explore suitable options.*

4. Concerning registration and selection of beneficiaries:

   - Deploy gender-mixed teams working in pairs (men and women) △

   - Only collect information that is needed to register/select beneficiaries.

   - Automated/digital systems to select beneficiaries, based on the set eligibility criteria, should be preferred whenever possible; this helps mitigating risks associated with potential manipulation of the process, such as individuals responsible for beneficiary selection soliciting sexual favors in exchange for inclusion on the list.

   - If considering targeting vulnerable children (e.g.: separated or unaccompanied children, Child-Headed Households), first contact CP actors in your area (internal or external to IOM) to assess risks and explore suitable options.

   - The database containing individuals´ information has restricted access and data is only shared with those who need to access it to verify and select beneficiaries.

> ▶ *Please refer to Box A on considerations regarding gender-mixed teams.*

5. While engaging with respondents, enumerators should:

   - Introduce themselves (their name and the name of the organization).

   - Explain the purpose of the registration and how the information will be treated and used.

   - Explain that enumerators are not responsible for beneficiary selection and therefore cannot influence decisions or add names to the selection list.

   - Explain that participation is voluntary, not all questions need to be answered by the respondents if they do not want to and that the interview can be terminated at any time.

   - Request informed consent (explain the process and purpose of the questionnaire and ask for their permission to administer the questionnaire) from the respondents.

   - Provide information on PSEA and existing Complaints and Feedback Mechanisms (CFMs).

> ⚠️ *Remember, enumerators must never ask anything in return for registering individuals.*

6. If registration is conducted by implementing partners or other third parties (e.g.: government, community leaders, etc).:

   - Any other third-party conducting registration should implement the same risk mitigation measures as IOM (as per guidance immediately above).

   - Gender-mixed IOM staff teams are deployed to monitor the registration.

   - Lists are verified by IOM (e.g.: IOM staff engages with a sample of listed beneficiaries to check data and confirm eligibility).

   - A MOU is signed with the entity conducting the registration to ensure data protection is in line with IOM standards[13].

7. On identification documentation that beneficiaries need to provide to confirm that they are the person targeted for the assistance:

   - Communities are consulted, including vulnerable groups (jointly with Protection staff), using appropriate and safe methods, to identify existing identification documentation options and risks associated with obtaining identification documents.

   - Discussions are held with financial service providers to explore options for identification documentation that are feasible to beneficiaries and in line with Know-Your-Customer (KYC) requirements.[14]

   - Whenever possible, multiple types of identification documents are accepted (e.g.; national IDs and passports, stamps, unique identification numbers, QRs, fingerprints, etc.)

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11 For detailed guidance on SEA risk mitigation considerations for beneficiary targeting, registration and selection, please refer to the S**EA Risk Mitigation Checklist for Data Management (DTM, IM, M&E),** and the **Beneficiary Targeting, Registration SEA Risk Mitigation Checklist.**
12 For further information on children as direct beneficiaries of CBI, please see: Children as direct beneficiaries of CBI - Thematic guidance for CBI staff January 2021 (update).pdf
13 See: IOM´s Data Protection Principles and Manual
14 Know-Your-Customer (KYC) requirements refers to the information that the local regulator requires financial service providers to collect about any potential new customer to discourage financial products being used for money laundering or other crimes. KYC rules apply customer due diligence to the task of screening and verifying prospective clients.

8. Field staff clearly explain to the selected beneficiaries why they were chosen; the message is reinforced throughout the activity. To minimize SEA risks linked to potential exclusion of certain individuals/groups*:

- Indirect benefits stemming from the project are emphasized in messaging disseminated to the community.
- Synergies are explored with complementary programmes and activities that may benefit other (vulnerable) groups and/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.*

9. Individuals who wish to express grievances (e.g.: about the beneficiary selection process) are directed to the available Complaints and Feedback Mechanisms (CFMs).

✵ DISTRIBUTION PLANNING & PREPARATION

1. Beneficiaries, especially vulnerable groups, are engaged in distribution planning to express their preferences (i.e.: to determine safe and accessible locations, convenient times for receiving the assistance, etc.).

> ⚠ *Avoid late-time distributions.*

2. Distribution site selection considers the following aspects:
- Site layout allows for easy communication with the beneficiaries and is large enough to accommodate and organize large groups without disorder and overcrowding.
- The site is easy to reach for beneficiaries.
- The site is accessible for persons with disabilities, women, the elderly.
- The site offers protection from rain and sun and the site is well lit.
- When the site is not within easy reach, additional distribution points to increase proximity to communities and reduce travel time are established.

> ⚠ *Cash disbursement for the protection cases shall not be done in gathering or at distribution points. Alternative solutions shall be adopted for cash and voucher assistance where beneficiaries can receive assistance in a safe and dignified way.*

3. Distribution is planned during times and at locations that are safe, appropriate and convenient for participants, especially the most vulnerable groups/individuals. Beneficiaries receive clear information on the assistance that will be provided, as well as date, time and location of distribution.

4. Beneficiaries receive information that aid is free and available Complaints and Feedback Mechanisms (CFMs)

> ⚠ *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.). Take into account literacy levels, consider alternative information dissemination methods such as oral and visual communication.*

5. Beneficiaries are encouraged to travel in groups to collection points and shops to minimize SEA/GBV risks related to transportation and commute. Arrangements are made to support the access for persons with disabilities and those with mobility issues.

6. Field teams receive information to carry with them on: a) available complaints and feedback channels; b) Protection/GBV services available in the target area[15]; c) contact details of the PSEA Focal Point(s); d) IOM´s SEA reporting channels (We Are All In platform and OIOintake@iom.int).

7. Field team and partners are provided with printed PSEA and complaint and feedback awareness-raising materials in local languages.

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15 For example, field teams can use the GBV Pocket Guide.

$ DISTRIBUTION OF CASH OR VOUCHERS

1. Field teams supporting distributions are gender balanced.

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

2. Field teams wear ID/badges and any other gear with logos at all times.

3. Depending on the context, and considering cultural sensitivities and local practices, waiting and sitting areas at the distribution venues shall be separated for men and women.

4. In case of security checking, a female body searcher is assigned to inspect women beneficiaries.

5. In case of a wait/delay for cash and voucher assistance at the distribution point, arrangements for the disabled, elderly, and pregnant/lactating women shall be ensured.

6. At the distribution venue, staff shall read and explain all beneficiary forms to the beneficiaries in the local language before getting signatures and providing assistance.

7. Context- and culturally- appropriate awareness materials (such as posters and pamphlets) on staff conduct and/or that aid is free and/or how to report misconduct are visible and/or handed out to beneficiaries in the local language(s), in visual form, or communicated orally, upon signature (or fingerprint) of the *Beneficiary Assistance and Consent Form.*

8. Separate waiting area and collection lines are established for women, men and persons with specific needs (i.e.; pregnant women, elderly, persons with disabilities).

> ⚠ *If possible, consider assigning separate collection times for men and women*

9. Persons with specific needs (e.g.: pregnant women, elderly, persons with disabilities) are prioritized to receive the assistance first.

10. Field staff explain clearly to beneficiaries how the delivery mechanism for cash or voucher assistance should be used, including:

   - Vouchers: locations where the voucher can be redeemed, value of the voucher (if value voucher) or items that can be purchased (if commodity voucher), how to redeem the voucher at the stores (explain how the beneficiaries will be able to redeem the voucher and buy items depending on whether it is an electronic voucher or a paper voucher, commodity or value voucher), etc.

   - Cash: value of the assistance, what it is intended to cover (multipurpose or for a specific purpose). If an electronic delivery mechanism is used, such as bank transfer, ATM cards or mobile money, or if beneficiaries are not used to handling cash, ensure that they have the necessary understanding and financial literacy to access and spend their assistance.

11. If problems and issues arise during distribution and involve women beneficiaries, these are handled by more than one person, and with the presence of a female field staff member.

12. Gender-mixed teams of monitors are deployed to perform process monitoring, i.e. audit distributions and flag any potential SEA/Protection risks[16].

13. Individuals who wish to express grievances (e.g.: about the assistance provided) are directed to the available complaints and feedback mechanism.

☒ REDEEMING THE VOUCHERS

1. Traders involved in the voucher programme receive messaging and training on PSEA, including where to report SEA.

2. Context- and culturally- appropriate awareness materials (such as posters and pamphlets) on staff conduct and/or that aid is free and/or how to report SEA are visible in the shops.

3. Mixed teams of monitors are deployed to conduct spot checks of traders and flag any potential SEA/Protection risks[17].

📝 AFTER THE DISTRIBUTION[18]

1. At a reasonable interval, post-distribution monitoring (PDM) exercises are conducted and include questions that enable the identification of red flags related to exclusion and unintended Protection/SEA risks linked to the intervention[19], as well as aspects such as beneficiary feedback on conduct of staff and partners, and intervention safety (including after the assistance is received).

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16 *Monitors can work with a standardized observational audit tool; for an example of safety audit tool that can be customized to CBI programmes, please refer to: Empowered Aid Toolkit, Annex 1.*
17 *Monitors can work with a standardized observational audit tool; for an example of safety audit tool that can be customized to CBI programmes, please refer to: Empowered Aid Toolkit, Annex 1.*
18 *For detailed guidance on SEA risk mitigation in post intervention/distribution monitoring, please refer to the **SEA Risk Mitigation Checklist for Data Management (DTM, IM, M&E).***
19 *For detailed guidance on PDM methodologies, sample tools that can be customized for CBI and questions that are safe to ask, please consult Post Distribution Monitoring for Shelter and NFI Programming – Guidance for Inclusive Programme and the Question Bank for CBI Post-Distribution Monitoring..*

BOX A – CONSIDERATIONS ON GENDER-MIXED TEAMS

While it is strongly advised that programmes take concrete steps to engage women as frontline workers/enumerators/facilitators as part of SEA risk mitigation measures, meeting these requirements may be challenging in settings where, for example, there are context-specific cultural and security barriers to employing women as frontline workers/enumerators/facilitators, or where addressing these would significantly compromise the reach and speed of the programmatic response. In such case, you may consider:

o Collaboration with other IOM teams (e.g.: Protection) within the operation that can volunteer women staff members to support activities that involve close interaction with community members, especially vulnerable groups.

o Engaging women-led local/community-based organizations, committees and groups to provide support and/or monitor such activities.

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 for activities that involve data collection.

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/an 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 report or not.
• Share information with the survivor about **available services** - know who the **service providers** (Health, Safety, MHPSS) in your target location are and use existing GBV/CP/Protection **referral pathway**, if there is one.
• 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.

BOX C – USEFUL RESOURCES

- IOM's PSEA Toolkit and Checklist
- Cash-based Intervention Manual