



WFP EVALUATION



World Food Programme

SAVING LIVES
CHANGING LIVES

Strategic Evaluation of WFP's Protection from Sexual Exploitation and Abuse

Centralized evaluation report – Volume I

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Disclaimer

The opinions expressed in this report are those of the evaluation team, and do not necessarily reflect those of the World Food Programme (WFP). Responsibility for the opinions expressed in this report rests solely with the authors. Publication of this document does not imply endorsement by WFP of the opinions expressed.

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Contents

Executive summary	i
1. Introduction	1
1.1. Evaluation features	1
1.1.1. Rationale.....	1
1.1.2. Objectives.....	1
1.1.3. Scope of the evaluation	1
1.2. Context	2
1.2.1. External context.....	2
1.2.2. Internal sexual exploitation and abuse context	2
1.2.3. Gender, equity and inclusion context.....	3
1.3. Subject being evaluated	3
1.4. Methodology, limitations and ethical considerations	5
1.4.1. Logic model framing & Evaluation Questions.....	5
1.4.2. Methodology.....	7
1.4.3. Validation, triangulation and synthesis	9
1.4.4. Key limitations	9
1.4.5. Ethical considerations.....	10
2. Evaluation findings	12
2.1. EQ1.How relevant are WFP policies and strategies for guiding PSEA?	12
2.1.1. EQ1A. How well aligned are WFP policies and strategies to international good practice and normative standards on PSEA?	12
2.1.2. EQ1B. To what extent do WFP strategic and policy frameworks provide internal coherence with WFP PSEA commitments?	17
2.2. EQ2. How do WFP systems and structures facilitate action and learning on PSEA?	19
2.2.1. EQ2A. How effective are structures and processes for enabling the implementation of WFP PSEA commitments?.....	19
2.2.2. EQ2B. How do WFP guidance, manuals and tools, including for risk, support WFP and partners in undertaking PSEA?	23
2.3. EQ3. How does WFP strengthen external coherence on PSEA for improved implementation? ...	36
2.3.1. EQ 3A. How well is WFP leading and engaging appropriately with inter-agency platforms and initiatives to address PSEA?	36
2.3.2. EQ3B: How well is WFP engaging appropriately in partnerships with governments and donors to strengthen PSEA?	39
2.3.3. EQ3C: How well is WFP supporting and engaging appropriately with cooperating partners to strengthen PSEA?	42
2.4. EQ4: Is WFP programming delivering on its PSEA commitments?	44
2.4.1. EQ4A. Are WFP measures for PSEA effective in generating confidence among personnel?.....	44
2.4.2. EQ4B. How do WFP personnel derive confidence that beneficiaries are aware of and are making use of WFP procedures on PSEA?.....	50

2.4.3. EQ4C. To what extent is zero tolerance on inaction to sexual exploitation and abuse evident in design and operational delivery?	57
2.4.4. EQ4D. How does WFP adapt its PSEA approach according to the context and programmatic specific environment in which it operates?	58
2.5. EQ5: How is WFP capability positioned to be responsive to a changing operational environment?	61
2.5.1. EQ5A. How well is WFP focusing on medium-term planning for PSEA and preparing to meet the needs of a changing operational environment?.....	61
2.5.2. EQ5B. How well is WFP accessing resources to cater for medium-term PSEA framework needs?	63
3. Conclusions	65
4. Recommendations	70

List of annexes (in volume II)

- Annex 1. Summary Terms of Reference
- Annex 2. Timeline
- Annex 3. Methodology
- Annex 4. Revised Logic Model
- Annex 5. Evaluation Matrix
- Annex 6. Country Illustrations
- Annex 7: Fieldwork Agenda
- Annex 8: Data Collection Tools
- Annex 9: Focal Point PSEA Survey
- Annex 10. Key Informant Interviews
- Annex 11. Timeline of Sector-Wide and WFP PSEA Commitments
- Annex 12. EQ1: WFP Referenced Policies, Strategies and Evaluations
- Annex 13. OECD-DAC Criteria and Linkages to the Evaluation Questions
- Annex 14. Status of CRF PSEA-Related Indicators
- Annex 15. Ethics Office Human Resources
- Annex 16: CSPs Referencing PSEA
- Annex 17: Comparative Exercise
- Annex 18. Mapping of Findings, Conclusions and Recommendations
- Annex 19. Acronyms and Abbreviations
- Annex 20. Bibliography

List of Figures

Figure 1: Logic model.....	6
Figure 2: Simplified logic model and the evaluation questions.....	7
Figure 3: Selection of country offices and regional bureaux for case studies and desk reviews.....	8
Figure 4: WFP policy hierarchy.....	13
Figure 5. Summary of key changes in CRF related to PSEA compared to 2017–2021 indicators.....	24
Figure 6. Trends on community feedback mechanism data.....	26
Figure 7. Impact/likelihood rating for sexual exploitation and abuse risk on risk registers.....	30
Figure 8. Distribution of the number of country offices presenting results against cross-cutting protection and accountability to affected population indicators 2019-2022.....	46
Figure 9. SEA investigations turn-around time (in months) for substantiated cases 2020–2023.....	49
Figure 10. SEA allegations against WFP staff and WFP partners (2017–2023).....	51
Figure 11. Number of sexual exploitation and abuse incidents per USD billion expenditure of operations.....	52
Figure 12: Perceptions of PSEA focal points regarding appropriateness, safety and accessibility of community feedback mechanism systems in percentages (total number of respondents: n=182).....	53

List of Tables

Table 1. Summary of the WFP PSEA reporting architecture.....	20
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List of Boxes

Box 1: Overview of themes.....	8
Box 2. UNHCR efforts to address the underlying causes of sexual exploitation and abuse through organizational cultural change.....	15
Box 3. UNICEF PSEA strategy, theory of change and action plan development	17
Box 4. Definitions of terms for EQ2.....	19
Box 5. Corporate results framework indicators, management results and key performance indicators related to PSEA.....	21
Box 6. UNHCR monitoring practice.....	23
Box 7. Good practice: WFP South Sudan action plan	24
Box 8. Peer organizations: Global PSEA capacity.....	32
Box 9. What could WFP do better to support you as PSEA focal point?	33
Box 10: Dedicated human resources for PSEA in South Sudan country office	34
Box 11. Cash-based transfer policy	38

Box 12. Good practice: Inclusion of PSEA in government legislative framework.....	40
Box 13 Good practice in a victim-centred approach good: Prioritizing victims.....	41
Box 14. Comparative exercise: UNICEF handbook on partner capacity support.....	43
Box 15: Opportunity for obtaining significantly useful PSEA prevalence or incidence data in Nigeria.....	47
Box 16. Example of drivers undertaking a role in community engagement	56
Box 17. Promising practice in the development and follow-up of PSEA in risk registers and mitigation	60
Box 18. Good practice: Continuing capacity building and community awareness of SEA risk.....	61

Executive summary

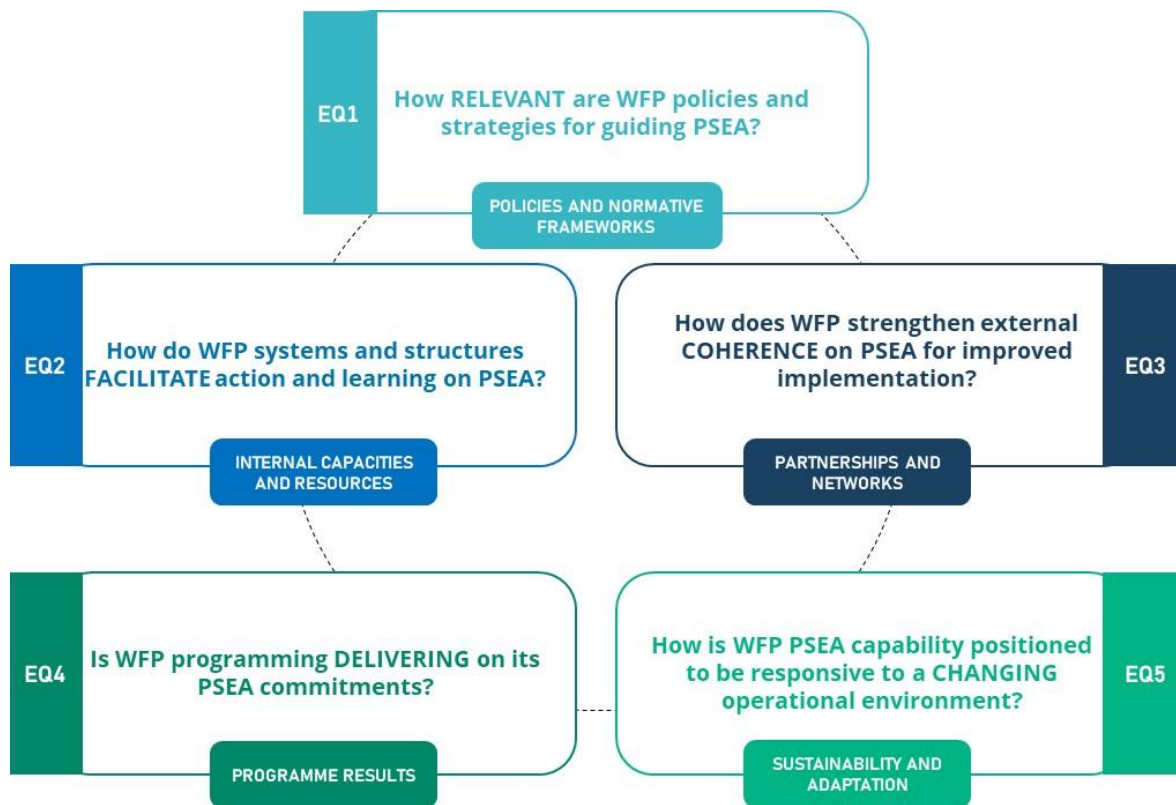
Introduction

Evaluation features

1. Sexual exploitation and abuse (SEA) is a serious risk to the people that WFP seeks to serve, a violation of humanitarian principles and a grave ethical and reputational risk for WFP. This formative strategic evaluation assessed how WFP has addressed its commitments to protection from sexual exploitation and abuse (PSEA), what has worked and where efforts can be further strengthened. The evaluation had both accountability and learning aims.

2. The evaluation assessed WFP's PSEA activity and progress between March 2017 and October 2023. It considered four interrelated components as the basis for effective PSEA: norms and standards; capacity and assets; partnerships; and management and leadership. They were assessed through five evaluation questions (figure 1):

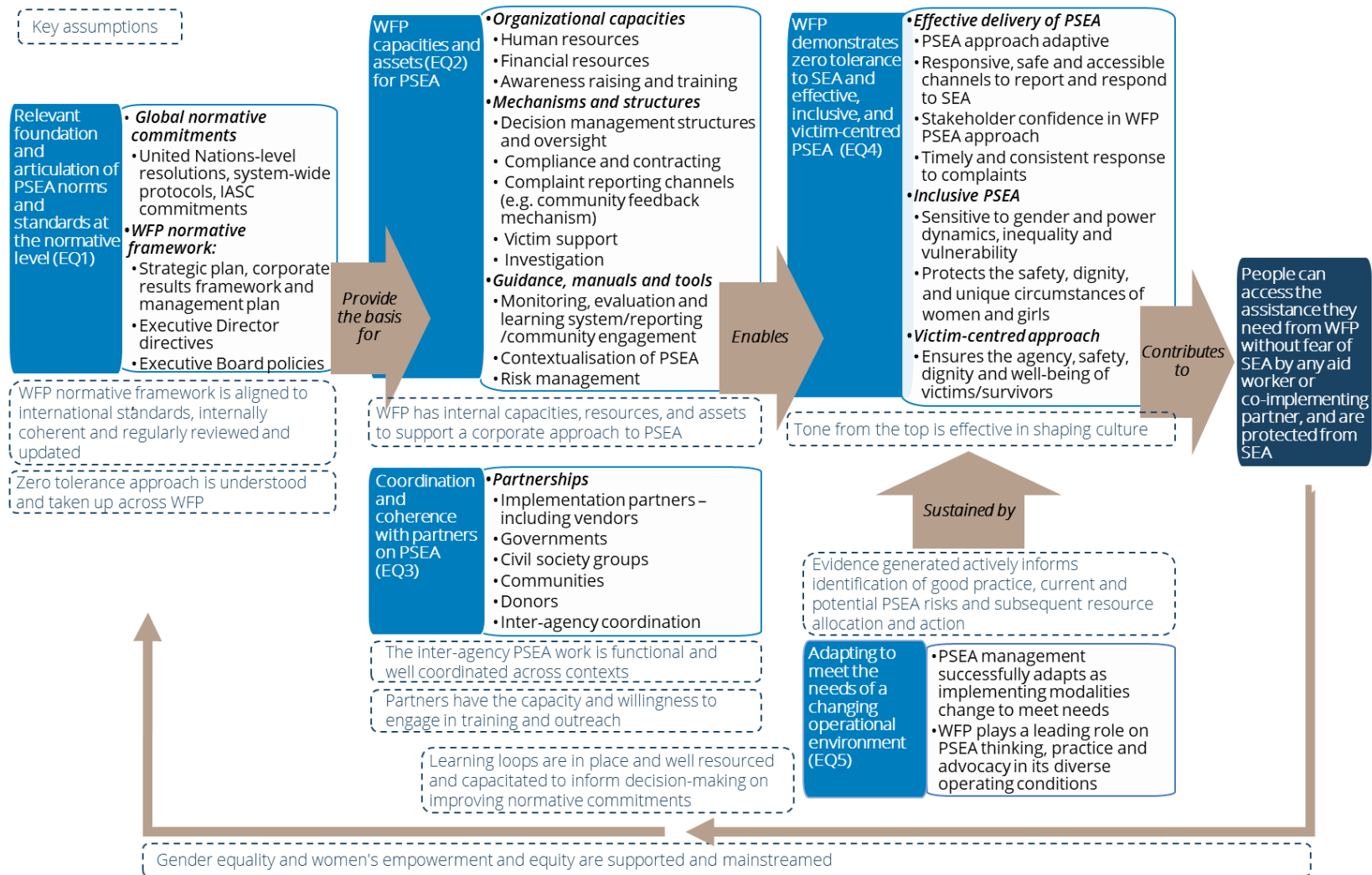
Figure 1: Evaluation questions



Abbreviation: EQ = evaluation question.

3. Following a systems-based design the evaluation team developed a logic model (figure 2) that supported the analysis of “what good looks like” for PSEA in WFP.

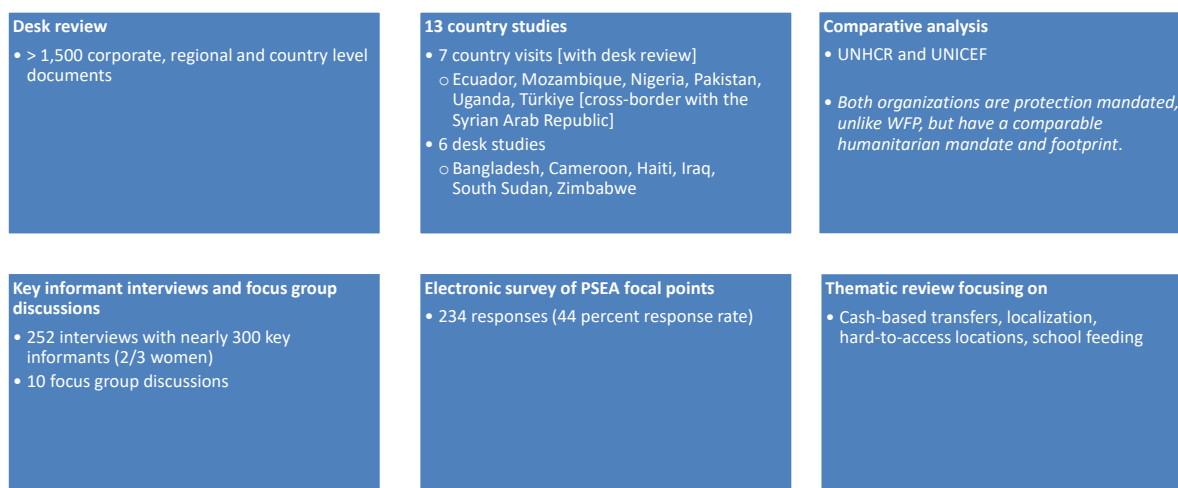
Figure 2: Logic model



Abbreviation: IASC = Inter-Agency Standing Committee.

4. Gender and equity considerations were incorporated into the methodology, ensuring that relevant questions, methods and data considered the intersection of sex, gender, age, vulnerability and disability.
5. Application of ethical principles was paramount in the evaluation to ensure the protection of participants and the integrity of the evaluation process. That included ensuring informed consent; protecting participants' privacy, confidentiality, autonomy and anonymity; respecting cultural sensitivity; and ensuring that the evaluation resulted in no harm to participants or their communities.
6. Data were collected at the global, regional and country levels through multiple evidence sources (figure 3).

Figure 3: Sources of evidence for the evaluation



Abbreviations: UNHCR = Office of the United Nations High Commissioner for Refugees; UNICEF = United Nations Children's Fund.

7. Limitations included the lack of a theory of change for WFP's PSEA work, limited institutional memory within WFP and limits on data collection from communities. Case management, investigations and sexual harassment were outside the scope of the evaluation.

Context

8. SEA is a form of gender-based violence that constitutes an abuse of power by aid providers against an affected population. It is rooted in gender inequality, power imbalances and disrespect for human rights. This framing is mirrored in the WFP strategic plan for 2022–2025, where SEA is recognized as a form of gender-based violence that could be committed by WFP staff and partners against beneficiaries.

9. Between 2019 and 2022, the number of people affected by chronic hunger globally grew by 17 percent. WFP and donor partners expanded their efforts to respond, with WFP's contribution revenue reaching USD 14.1 billion in 2022. Subsequently, funding reductions (from USD 14.1 billion in 2022 to USD 8.3 billion in 2023¹) have increased the potential for reduced assistance to affected populations.

10. Redoubling efforts on PSEA is particularly important as cuts to assistance increase vulnerability to exploitation at the community level by intensifying the power imbalances between aid providers and communities, significantly increasing the risk of SEA and negative coping strategies such as transactional and survival sex, with potentially grave consequences for beneficiaries and partners and for WFP corporately.²

¹ WFP. 2024. [Contributions to WFP in 2023](#). Accessed on 2 April 2024.

² V. Ahlenback. 2021. [GBV AoR Helpdesk – Gender Based Violence in Emergencies. Research Query: Brief Overview of Research, Evidence and Learning on the Links between Food Insecurity and Gender-Based Violence in Conflict-Affected Settings](#). Page 6.

11. Over the past decade, the United Nations system and the Inter-Agency Standing Committee (IASC) have strengthened their awareness of the risks and responsibilities, in terms of PSEA, of humanitarian actors in relation to the people they aim to serve. Within the context of United Nations system-wide commitments, WFP's approach to PSEA derives from the Secretary-General's Bulletin on special measures for protection from sexual exploitation and sexual abuse, the IASC six core principles relating to SEA and the IASC minimum operating standards for PSEA.

Subject

Protection, within the context of this evaluation, refers to activities to prevent, reduce, mitigate and respond to the risks and consequences of violence, coercion, deprivation and abuse for persons, groups and communities.

Sexual exploitation and abuse refers to acts committed by employees of WFP or its partners against communities served by WFP. Sexual harassment, on the other hand, focuses on acts committed by WFP employees against other WFP employees and was not a focus of the evaluation.

12. WFP considers SEA "acts of gross misconduct" constituting grounds for termination of employment. WFP has been consistent in adopting a "zero tolerance" stance toward SEA and considering PSEA to be a "moral imperative".

13. The first Executive Director's circular on PSEA was issued in 2004, with subsequent circulars issued in 2005, 2013, 2014 and 2023. All such circulars are rooted in system-wide United Nations and IASC principles, with individual circulars introducing new detail and additional responsibilities over time.

14. In 2024, Executive Director Cindy McCain became the 2024 IASC Champion on Protection from Sexual Exploitation and Abuse and Sexual Harassment (PSEAH) to "lead in bolstering efforts to create a humanitarian system free from sexual misconduct".

15. WFP's strategic and policy direction on PSEA extends from the Executive Director's circular on Special Measures for Protection from Sexual Exploitation and Sexual Abuse, as updated in May 2023, which highlights WFP's approach of "zero tolerance for inaction on all forms of SEA". This complements the direction on PSEA set out in WFP's strategic plan for 2022–2025, which outlines three key strategies for PSEA:

- integration of PSEA into all programming and operations;
- strategic communication for education and transparency; and
- enhanced coordination with key stakeholders at all levels to prevent, respond to and mitigate SEA effects through a victim-centred approach (VCA).

16. Since 2018, the Ethics Office has been the organizational focal point on PSEA. Its role includes building capacity for WFP staff and partners on PSEA, enhancing policies and practice on PSEA, expanding PSEA mainstreaming, identifying opportunities for mitigation and preventive actions and representing WFP at the United Nations, inter-agency and regional bureau levels.

17. WFP holds all staff, consultants, volunteers, cooperating partners and vendors accountable for preventing and responding to SEA. Stipulations for PSEA apply to all WFP activities and operations, including any project funded by WFP and any project implemented by WFP or any government agency or cooperating partner. The stipulations extend to situations of SEA that occur at or away from the workplace, whether during or outside working hours.

18. A network of focal points³ at the regional bureau, country office and field office levels, supported by the Ethics Office, is responsible for enabling PSEA across the organization. Their responsibilities include supporting PSEA, including raising awareness among employees and partners and receiving reports of SEA directly from victims.

³ A total of 532 focal points according to the PSEA focal point survey email list provided by the Ethics Office.

Evaluation findings

How relevant are WFP policies and strategies for guiding protection from sexual exploitation and abuse?

19. The 2023 Executive Director's circular represents a necessary "refresh" for WFP and provides a clear statement of intent to deliver on United Nations system-wide and IASC commitments from the last decade. The evaluation found that the 2023 circular significantly updated WFP's normative framework on PSEA, outlining administrative and management expectations for the roles and responsibilities of WFP staff and partners and communicating important "new" commitments to WFP staff, including zero tolerance for inaction, commitment to VCA and proscription of sexual activity with a child.

20. Unlike some other United Nations agencies, WFP separates SEA from other types of sexual misconduct, and the 2023 Executive Director's circular omits a framing of the power imbalances that enable both types of offense. According to the Office of the United Nations High Commissioner for Refugees (UNHCR), understanding the power dynamics in delivering assistance is critical to preventing and responding to sexual misconduct. The Ethics Office has initiated awareness-raising on the commonalities of different types of misconduct through "Speak Up" sexual misconduct training; however, that understanding has not yet been institutionalized across WFP, which may contribute to WFP managers' uncertainties regarding their role.

21. In contrast to other agencies, WFP has no organizational strategy or implementation plan that accompanies the 2023 Executive Director's circular. The Ethics Office developed an internal strategy encapsulating its vision, but there is no organizational implementation plan for WFP. It is unclear how management derives confidence that PSEA commitments are being met. In comparison, the organizational strategy of the United Nations Children's Fund (UNICEF) on PSEAH is supported by an action plan and a monitored theory of change outlining the components of PSEA and the risks, assumptions and intended results of PSEA for UNICEF.

22. WFP's strategic plan for 2022–2025 refers to the integration of PSEA into programming for the first time, and policies increasingly reference PSEA. The strategic plan states that "measures for protection from SEA will also be integrated into operations and programming". Recent policies (7 of the 11 developed since 2018) refer to PSEA, although they do not expand on what WFP's approach to meeting PSEA commitments should be.

23. WFP increasingly mentions PSEA commitments in country strategic plans (CSPs), but there are few examples of CSPs articulating concrete expectations. Currently, 41 CSPs refer to PSEA and/or include relevant corporate results framework indicators as part of reporting. A small number of CSPs provide details on PSEA commitments at the country level.

How do WFP systems and structures facilitate action and learning on protection from sexual exploitation and abuse?

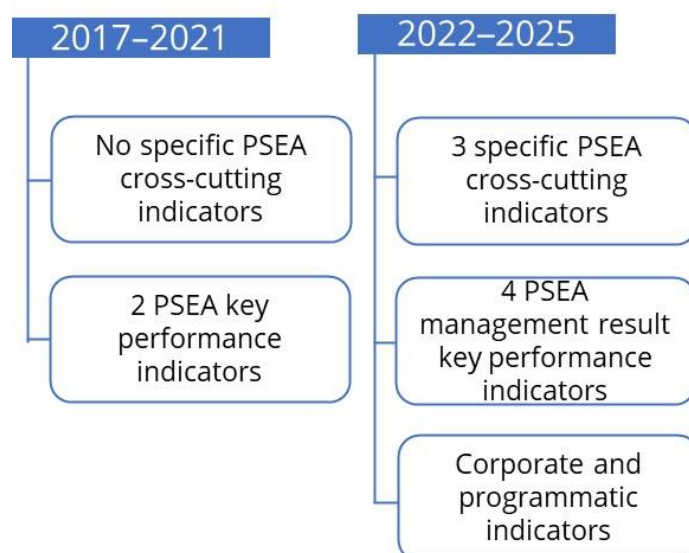
24. **PSEA commitments, as outlined in the 2023 Executive Director's circular, have not yet been uniformly communicated.** Communication of the circular to all staff was reinforced by messaging from country directors that PSEA is a priority. Notwithstanding those diverse efforts, the evaluation found that many staff were unaware of the commitments.

25. Staff are aware of PSEA obligations related to their conduct but not how the obligations influence their jobs. The absence of an implementation plan has meant insufficient articulation of the structures and processes required for effective PSEA. Although managers in country offices largely believed that they were already meeting PSEA obligations through clauses in staff and partner contracts, staff completion of mandatory e-learning on PSEA and community awareness-raising, they also acknowledged that they were not always sure about whether the right actions for PSEA were being prioritized and whether their choices comprised effective management and oversight of PSEA.

26. WFP structures and processes increasingly generate PSEA-related corporate monitoring data; however, those data largely feed into headquarters' reporting rather than being used to inform decision-

making at regional bureaux and country offices. Current data are geared towards headquarters management information systems, making it challenging to track progress or draw trends by region or type of WFP intervention, including emergency response. The 2022–2025 corporate results framework introduced indicators related to PSEA (figure 4), but no performance data are yet available.

Figure 4: Changes in the WFP corporate results framework relating to protection from sexual exploitation and abuse



Source: WFP 2017–2021 programme indicator compendium, April 2019 update; WFP compendium of key performance indicators; WFP indicator compendium (2022–2025), August 2023.

27. PSEA-specific guidance, manuals and tools, while available, are not widely known about or systematically utilized in all contexts. Country offices consistently expressed the need for more practical guidance on using the tools and for materials to be tailored to specific partners and contexts.

28. **Country offices consider community feedback mechanisms (CFMs) to be the backbone of a PSEA reporting system.** CFMs were cited as the core of a community facing PSEA system. In practice, CFMs are usually a beneficiary feedback “hotline” owned and managed by WFP. Several hotlines assessed were only active on weekdays during office hours, were not free, were understaffed or had limited multilingual capacity. Only 54 percent of country offices reported having a CFM for highly-sensitive cases such as allegations of misconduct or SEA. WFP’s own analysis has identified gaps related to the effectiveness of channels for SEA cases.

29. Guidance is available on the provision of victim assistance/services, but staff feel more is required to clarify WFP’s commitment to victim-assistance and the new commitment to VCA. While WFP agreed to a VCA in all aspects of PSEAH activity as recommended by the IASC 2021 external review of PSEAH, VCA was only recently widely communicated through the 2023 Executive Director’s circular; by contrast, UNHCR has a standalone policy on VCA. Staff were unclear on VCA obligations and questioned the feasibility of WFP providing such support. Guidance is under development, however, as the Office of Inspections and Investigations has developed an internal standard operating protocol on VCA principles and the Ethics Office is working on finalizing a joint Ethics Office/Office of Inspections and Investigations standard operating protocol in 2024.

30. **Country offices require additional support to understand SEA risk and risk mitigation.** WFP country offices do not systematically include SEA in their risk registers, even where the operating environment and the nature of programming indicate SEA as a significant risk. Mitigation measures focus on training for staff, cooperating partners and vendors; beneficiary awareness-raising; development of

PSEA/protection action plans at the country level; and strengthening of CFMs/reporting tools. The evaluation found that an absence of SEA reports is not perceived as problematic by WFP managers and tends not to trigger enquiry into whether reporting channels are accessible or fit for purpose.

31. **Capacity-building on PSEA for staff is primarily provided through mandatory online training.** As of January 2024, 79 percent of staff had completed all mandatory courses, including that on PSEA. Most staff equate their PSEA capacity and knowledge with this training; however, the training lacks systematic follow-up or routine refresher training, even during emergency response staff surges.

32. The Ethics Office has driven WFP’s progress on PSEA since 2018 but with limited resources to support its function until 2023, particularly compared to peer agencies. The workload of the Ethics Office has been greater than anticipated and has steadily increased over time. For example, the Ethics Office responded to 66 “technical advisory” requests in 2018, which escalated to 300 in 2022. Compared to other agencies, and although not protection-mandated, WFP has fewer human resources in place to address PSEA (see the table below).

COMPARISON OF HUMAN RESOURCING FOR PROTECTION FROM SEXUAL EXPLOITATION AND ABUSE BETWEEN WFP, UNHCR AND UNICEF

	WFP	UNHCR	UNICEF
Senior management	<ul style="list-style-type: none"> Director of Ethics (D-1) is the most senior position (a minimum percentage of time is dedicated to PSEA) reporting directly to the Executive Director 	<ul style="list-style-type: none"> Senior coordinator for SEA and sexual harassment (D-1) coordinates a multifunctional headquarters team PSEA action plan monitored by the Emergency Task Force, chaired by the Deputy High Commissioner 	<ul style="list-style-type: none"> PSEAH coordinator in the Office of the Executive Director
Headquarters staff capacity	<ul style="list-style-type: none"> Five staff (including four consultants) fully dedicated to PSEA; 50 percent of one staff member dedicated to PSEA in the Ethics Office (2023). The most senior is at the P-4 level. 	<ul style="list-style-type: none"> Headquarters team of seven staff, the most senior of which is at the D-1 level 	<ul style="list-style-type: none"> Established unit led by a P-5 since 2019
Global staff capacity	<ul style="list-style-type: none"> 500+ PSEA focal points 	<ul style="list-style-type: none"> 400 PSEA focal points 	<ul style="list-style-type: none"> P-4 positions in all regional offices Network of national and international PSEA specialists

33. WFP has established a network of focal points that provides an excellent foundation for delivering on PSEA commitments. The network now requires additional support and time to optimize its efficacy. Deputy country and regional directors act as PSEA focal points in each office, with an alternate focal point at the technical level. The effectiveness of the role depends on knowledge, technical capacity and the time available for it. Focal points do not systematically have their PSEA responsibilities reflected in annual

performance appraisals and are often stretched in performing their PSEA role on top of their full-time commitments.

34. **Budget allocation for PSEA both at headquarters and in country offices is limited, inconsistent and opportunistic.** Budget information for PSEA has not been tracked or designated. Country offices referred to budgeting shortfalls and a lack of ringfenced budget for PSEA; however, when resources are requested, they are made available on an ad hoc basis.

How does WFP strengthen external coherence on protection from sexual exploitation and abuse for improved implementation?

35. Since the establishment of the PSEA function within the Ethics Office in 2018, WFP has substantially increased its technical contributions to addressing PSEA in inter-agency platforms and engaging in inter-agency and bilateral PSEA-related projects. Increasingly, WFP has also contributed to inter-agency PSEA networks at the country level, co-chairing directly and providing resources for coordinators elsewhere in different contexts. However, differing degrees of engagement in PSEA at the country level present a picture of unsystematic engagement overall.

36. **WFP has not yet fully realized its leadership capacity for PSEA across the cluster system.** WFP has not yet maximized its leadership of the logistics and emergency telecommunications clusters or co-leadership of the food security cluster to broaden awareness of SEA risk and PSEA compliance among standby partners and cluster members, including non-governmental organizations (NGOs), private sector and donor representatives and governments. Projects under global cluster leadership provide strategic and operational openings for WFP to leverage its position and footprint to improve PSEA. Its influential role in how the sector provides cash assistance offers WFP a significant opportunity to future-proof cash-based transfer modalities against SEA risk.

37. Like other United Nations entities, WFP has not provided specific guidance on PSEA commitments relating to government partnerships. As WFP shifts toward an “enabling model” as envisaged in the current strategic plan, WFP staff will increasingly need to understand their PSEA responsibilities in relation to government partners. Staff express uncertainty about their obligation to report violations where national or local authorities are involved in delivering WFP programming. Many country and regional WFP personnel were uncertain how victim assistance would be supplied or a VCA applied in such situations.

38. **There is a lack of proactive dialogue with donors about SEA.** Although the degree to which donors themselves have proactively raised SEA risks with WFP varies, escalating risks arising from funding cuts is not consistently a theme of dialogue. Staff requested guidance on how to discuss prevention and risk management with donors given the high levels of sensitivity around such issues.

39. Despite positive steps to assess the PSEA capacity of its NGO cooperating partner portfolio using inter-agency tools, WFP’s capacity to undertake this activity is limited. WFP has worked with United Nations peer entities to develop an inter-agency capacity assessment tool to enhance accountability and the capacity of cooperating partners and prevent duplication of assessments; however, this approach places increased demands on country offices, where PSEA focal points often already have multiple roles. In addition, WFP makes assumptions regarding its cooperating partners’ capacity to identify and address PSEA risks and has not fully considered the risks posed by vendors, financial service providers and other non-NGO partners, for whom the standard guidance, developed for NGOs, may not be applicable. Accordingly, WFP’s levels of risk exposure may be underestimated.

Is WFP programming delivering on its protection from sexual exploitation and abuse commitments?

40. WFP’s programming falls short of fulfilling PSEA commitments, with staff not yet confident in PSEA measures and investigations, monitoring systems not yet capturing full reporting and available data not yet being fully utilized. Specifically, delivery of PSEA commitments has been affected by the issues discussed below.

41. **PSEA focal points lack the time to implement PSEA-related activities and the confidence to deliver PSEA results.** Expectations of the focal point role are unclear to senior management. Focal points

requested more support (e.g. training, guidance and psychosocial support) to enhance their confidence in delivering results. Additionally, they face significant challenges balancing their role with other responsibilities. Most focal points (87 percent) reported that the time spent on their role was limited to 1–5 hours or less per week.

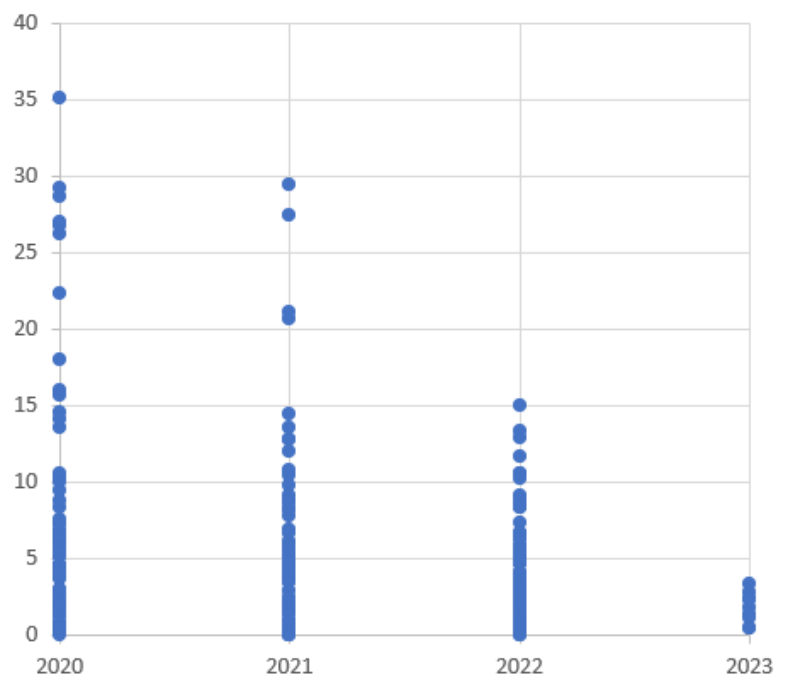
42. WFP is making efforts to develop effective indicators and build a monitoring system for PSEA, although such initiatives have not yet yielded consolidated reporting. The reporting infrastructure currently makes it difficult to aggregate data on PSEA. Monitoring challenges for PSEA reflect wider monitoring challenges across WFP (e.g. lack of consolidated reporting), especially regarding reporting on cross-cutting issues.

43. There are opportunities to better utilize available data and integrate PSEA into needs assessments for PSEA-sensitive programming at the country level. SEA risk is not currently within the scope of needs assessments. Where instruments include a question on SEA exposure, the data are not routinely analysed or utilized in decision-making. Prioritization exercises do not systematically take available PSEA evidence into account, despite the increasing risk.

44. Efforts to increase the overall safety and protection of beneficiaries may have unintended effects – both positive and negative – on PSEA outcomes. Initiatives designed to address gender-based violence have helped to reduce the risk of SEA (e.g. reducing the time women/girls walk to fetch water, thus reducing potential exposure to sexual violence). Conversely, there was no evidence that SEA vulnerability had been considered in initiatives where women were interfacing with vendors (e.g. where women are provided with cash to promote economic empowerment).

45. **Staff perceive that investigations on SEA remain protracted despite faster turnaround times in investigations.** Although investigation timelines have improved (figure 5), limited feedback on these developments has meant that staff confidence in WFP’s PSEA response efforts has not yet increased. According to staff interviewed, the handling of past cases has contributed to a general lack of confidence in progress.

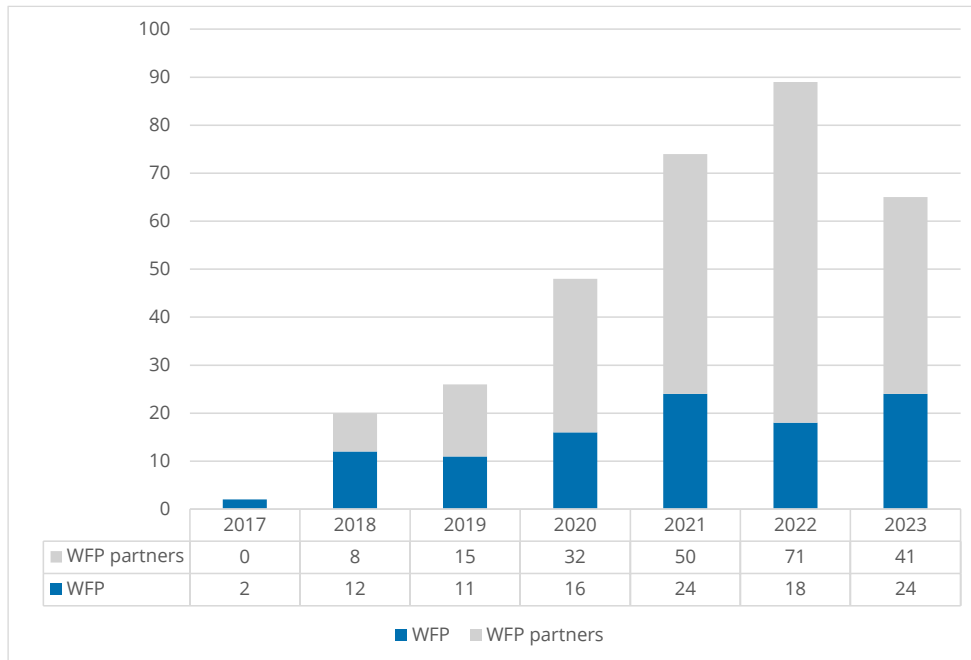
Figure 5: Sexual exploitation and abuse investigations turnaround time (in months) for substantiated cases, 2020–2023



Source: Office of Inspections and Investigations internal data.

46. The small increase in the number of SEA reports in the last five years is not proportional to the growth in WFP’s operational activities or the scale of reports received by other organizations. WFP’s number of reported SEA cases has remained relatively constant and low since 2018, while case numbers reported by WFP partners have steadily increased (figure 6).

Figure 6: Sexual exploitation and abuse allegations against WFP and partner staff (2017–2023)

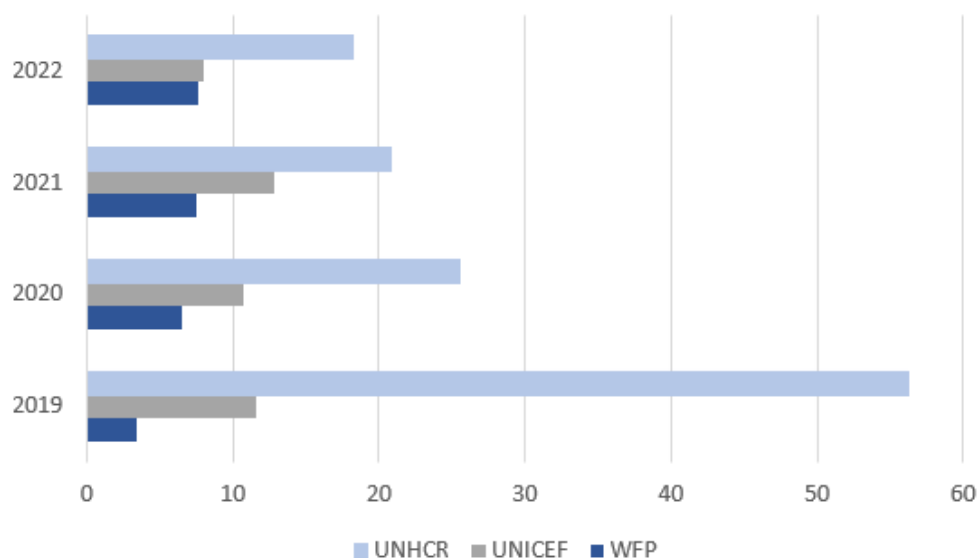


Source: United Nations i-tracker.

47. While WFP’s expenditure grew by 53 percent between 2019–2022, the incidence of SEA reporting remained fairly low relative to WFP’s organizational footprint and expenditure and in comparison to other entities, especially given that food distributions in many contexts are reportedly the “highest source of SEA” (figure 7).⁴

⁴ The Global Women’s Institute. [Uganda](#). Accessed on 2 April 2024.

Figure 7: Number of SEA incidents per USD 1 billion in operational expenditure



48. **Corporate guidance is not yet in place for victim assistance and case management.** Although country offices have locally established victim referral pathways and victim assistance, there is limited capacity for case management. Concerns regarding SEA case management were raised in every country visited, including breaches of confidentiality during referrals of SEA; inconsistency in the “do no harm approach”; limited capacity to handle cases involving children or follow up on victims’ referrals and assistance; and limited guidance on case referral and assistance for staff in the field. The new commitment to VCA has not been consistently integrated into case management tools.

49. Although the importance of “zero tolerance to SEA” is widely disseminated, “zero tolerance to inaction” is a relatively new concept and its implications are not yet clear. While staff widely understand that zero tolerance means consequences for any staff member who commits an act of SEA, there is little clarity on how the commitment to “inaction” affects their daily work (e.g. the inclusion of SEA risk assessment within programme design and delivery).

50. **WFP does not routinely adapt its PSEA approach to specific contexts, such as in emergencies.** While WFP’s programming requires constant monitoring and adaptation, PSEA action plans are not routinely adapted when the context changes. Unlike some peer organizations, WFP has not provided PSEA surge support when new emergencies have occurred. Some capacity to support targeted countries is expected to be available in 2024 as part of a grant-funded activity.

51. **Learning initiatives on PSEA are now taking place but there is little evidence of feedback loops on adaptive PSEA programming.** There have been few opportunities for exchanges between country offices to understand what works for contextualizing and adapting PSEA. The Ethics Office compiled best practices and established an advisory network to share learning in 2018, but there is no record of recent network activity. There is a promising practice in a few countries of including SEA in risk registers, allowing the country office to pinpoint mitigation measures with assigned accountabilities.

How is WFP protection from sexual exploitation and abuse capability positioned to be responsive to a changing operational environment?

52. **Assuming the role of IASC Champion on PSEAH for 2024–2025 will give WFP a visible role in global leadership on PSEA.** WFP is now starting to make progress toward the medium-term commitments outlined in the IASC vision and strategy on PSEAH, although it has embarked on the PSEAH championship at a time of significant operational and institutional challenge. The IASC strategic commitments up to 2026 are to operationalize VCA; promote lasting change in organizational culture, behaviour and attitudes towards all

forms of sexual misconduct; and provide support to inter-agency PSEA country structures, prioritizing settings identified as high risk.

53. WFP's progress toward the IASC commitments includes:

- explicitly committing to the operationalization of VCA through the 2023 Executive Director's circular: the next step will be to develop guidance to clarify how resources and victim support will be provided;
- promoting change in organizational culture, behaviour and attitudes on PSEA through taking on the IASC PSEAH championship and committing to "zero tolerance to inaction": mandatory PSEA training ensures that all staff have a basic understanding, although there is progress to be made on ensuring that PSEA is understood as everyone's responsibility; and
- supporting country capacity prioritization in settings identified as high risk: in its role as first responder to many crises, WFP has room to develop the mechanisms, capacity and resources to further support PSEA efforts (e.g. by deploying its own PSEA focal points in priority contexts).

54. Efforts to identify cost efficiencies may overlook increasing SEA risk arising from escalating vulnerabilities and decreased budgets. PSEA is included in "ethical risk mapping" conducted by the Ethics Office, but WFP does not yet have a systematic approach to assessing SEA risk and prioritizing support for PSEA accordingly. The 2023 WFP reassurance action plan did not highlight SEA risk to the same degree as the risk of fraud, corruption or aid diversion. Contingency plans are not yet in place for any increase in SEA cases and WFP does not yet have protocols for scaling up PSEA in an emergency response.

55. **Amid declining funding and increasing projected needs, PSEA is not being proactively raised in dialogue with donors.** Apart from one grant secured for PSEA, the evaluation did not identify where WFP is advocating externally for additional PSEA funding. Reductions in country office budgets are already driving concerns about increased vulnerability at the community level – with associated increased risks of SEA – and decreased capacity for oversight and monitoring.

Conclusions

56. Overall, the evaluation found that WFP has made important steps towards meeting PSEA commitments. Even with its lean capacity, the Ethics Office has taken the agenda forward corporately, providing valuable guidance and support to focal points globally. WFP is now a key player in inter-agency PSEA platforms.

57. While noting these achievements, the evaluation also found that delivery on PSEA commitments had been hindered by lack of prioritization and accountability, inadequate human and financial resources and limitations in the monitoring and internal feedback loops for understanding SEA prevalence and PSEA effectiveness. There is no evidence that PSEA is understood to be a cross-organizational responsibility. Consequently, WFP programming does not yet adequately assess and mitigate SEA risk across all settings and programming modalities.

58. The absence of consistent past investment in PSEA is only being recognized now, just as the organization faces considerable operational and institutional challenges that are likely to increase its SEA risk exposure in the immediate term.

59. The strategic evaluation produced ten conclusions, as detailed below.

60. **Conclusion 1.** The 2023 Executive Director's circular on PSEA brings WFP broadly – and somewhat belatedly – in line with United Nations system-wide commitments on PSEA. The circular introduced key updates to WFP's approach to PSEA through enhanced responsibility across the organization, a commitment to zero tolerance to inaction on SEA and the principle of applying VCA, and further clarification of the PSEA obligations of WFP's cooperating partners and vendors. The circular has been supported by multiple, albeit uncoordinated, corporate commitments to PSEA. It does not, however, constitute a policy instrument that can examine issues such as cultural change and the root causes of SEA or articulate broader operational definitions of zero tolerance on inaction or VCA.

61. **Conclusion 2.** The Ethics Office has steadily built WFP's PSEA capacity over the last five years. Although PSEA capacity is only now approaching levels comparable to those of other humanitarian organizations, the Ethics Office has supported a network of committed focal points that provides a strong foundation for fulfilling operational commitments. Nonetheless, headquarters and regional bureaux currently lack the resources needed to provide adequate support to focal points in country offices, even though the cost of not providing that support may be significant in the face of the potential risks. Management currently lacks the confidence to proactively engage and deal with PSEA as an issue. A step change is urgently required as the Executive Director takes on the role of IASC PSEAH Champion.

62. **Conclusion 3.** PSEA commitments have not been mainstreamed across WFP's policy landscape and many WFP staff do not see themselves as having the operational responsibility to deliver on PSEA commitments. WFP does not currently have a standalone policy and implementation strategy to guide delivery on its PSEA commitments. Interventions such as cash-based transfers and school meals present potential SEA risks but do not yet have PSEA considerations built into programme design. Lack of guidance in sectoral strategies and in most CSPs amplifies the risks that WFP is facing. Such guidance is particularly important given the need for prioritization in the face of current and imminent resource constraints.

63. **Conclusion 4.** WFP has committed to VCA but has not yet absorbed what that commitment entails. The organization is yet to provide clarity on how to translate VCA into case management tools, a standard operating protocol, intake interview guidelines and in-country case reporting systems. There are opportunities to learn from work by other United Nations organizations on operationalizing VCA in practice and provide clarity on resourcing implications.

64. **Conclusion 5.** While progress is being made, PSEA is not yet systematically operationalized within WFP. Many of the elements of a PSEA system – including high levels of participation in mandatory PSEA training, CFM guidelines and the inclusion of PSEA commitments in field-level agreements with partners – are now in place but have yet to be formalized and presented as a system. However, no protected budget is in place, and more targeted training on PSEA is required. In addition, WFP's primary reliance on CFMs for receiving SEA complaints is a weakness. While work on gender-based violence has helped to mitigate SEA risk, WFP does not consistently identify where its programming has the potential to increase or sustain abuse of power by those delivering aid. SEA risk mitigation is also not systematically considered in programme design when contexts or delivery modalities change. The 2023 reassurance plan explicitly refers the need for “safe, inclusive, accessible channels” to “facilitate incident reports of a sensitive nature”, including for SEA in all high-risk operations. Monitoring systems are not tailored to operating environments or programme modalities that present higher SEA risks and managers do not receive data that provide them with confidence that PSEA commitments are being met. WFP has not yet encouraged managers to follow up on an absence of reports of SEA.

65. **Conclusion 6.** WFP has relied on compliance to manage the SEA risk in its partnerships. Historically, WFP has depended on a partnership model that assumes partners have capacity in PSEA, delegating responsibilities through contracts and requiring limited engagement and support from country offices. As WFP increasingly diversifies its partner base and profile, risk exposure becomes more evident, and a reliance on compliance will not suffice. The potential risks and the need to tailor the PSEA approach in cooperation with local partners, vendors and financial service providers has thus far been a blind spot. At the same time, regional and country office focal points are already overloaded and cannot currently provide the range of support to partners that the evolving partnership portfolio requires.

66. **Conclusion 7.** Until recently, WFP's guidance was strongly weighted towards the responsibility to report. SEA programming is still geared towards reactive measures based on incident detection – as demonstrated in current CFM structures – rather than prevention mechanisms, including those that address root causes of vulnerability and exposure to SEA risk. As WFP works with new forms of partnership, diversifies its delivery model and delivers in hard-to-reach contexts where vulnerability to SEA is both acute and chronic, it becomes vital to ensure that all staff understand their role in preventing SEA in their day-to-day work. While WFP is appropriately focused on ensuring confidentiality for individual cases, there is no evidence that systemic risks are being effectively identified and communicated, through management lines, to inform and enhance preparedness and prevention activities.

67. **Conclusion 8.** WFP is increasingly visible in global and national inter-agency PSEA forums, although its role at the country level is often more that of a contributor rather than a leader. WFP can nevertheless celebrate the achievements of its inter-agency cooperative work. While it has only recently played a role in inter-agency platforms commensurate with its size, WFP can identify areas where it has a comparative advantage and where leveraging specific partnerships will allow the organization to use its influence. Those areas include consideration of risks associated with cash-based transfers, school meals, private sector actors and financial service providers and coordination of the food security and livelihoods cluster and the logistics cluster. In some cases, enhancing inter-agency coordination to communicate with governments may be more effective than working independently.

68. **Conclusion 9.** There are indications of an absence of trust and confidence in WFP's PSEA measures. Although there have been clear, documented improvements in investigation timelines, there is a perception among many WFP staff that inquiries into SEA are protracted as feedback and updates are limited. This undermines staff confidence in the PSEA reporting system, which in turn prevents them from encouraging communities to trust the system. WFP staff are asking for a different form of discussion about SEA, the underlying causes of SEA and the criticality of PSEA, and greater understanding of the progress that is being made in developing a robust PSEA system.

69. **Conclusion 10.** Change is needed if WFP is to reduce the organization's significant unacknowledged and unmitigated SEA risk exposure and, more importantly, reduce the risks for the most vulnerable people that WFP seeks to serve. WFP has seen a small but steady rise in SEA cases in the last five years. This is a positive indicator of increasingly effective PSEA, but it is not proportional to the expansion in WFP's global footprint over the same period. While the humanitarian and development sector has acknowledged chronic underreporting of SEA, WFP's reporting is still lower than that of other humanitarian organizations. In a highly constrained funding environment, SEA risks will increase in line with increasing vulnerability, and complaints will likely rise. Effectively mainstreaming current PSEA commitments is an urgent priority. This will require planning, resourcing, monitoring and reporting to managers and senior levels of WFP. It is a whole-of-organization responsibility requiring cross-organizational attention.

Recommendations⁵

	No.	Recommendation	Responsibility	Other contributors	Priority	Deadline
CROSS-ORGANIZATIONAL ACCOUNTABILITY FOR AND ACTION ON PROTECTION FROM SEXUAL EXPLOITATION AND ABUSE						
IMMEDIATELY	1	Urgently invigorate and strengthen commitment to, and accountability for, protection from sexual exploitation and abuse (PSEA) across WFP by appointing a cross-organizational task force to operationalize the 2023 Executive Director’s circular through an implementation plan for 2024–2026.	Ethics			
	1.1	Develop terms of reference for a WFP-wide PSEA task force (e.g. based upon the terms of reference for the interdisciplinary task force that supported the delivery of Executive Director’s circular OED2022/004). <i>The task force should be representative of WFP divisions, including Risk Management, Programme Delivery and Emergency Coordination (all components of the Programme Operations Department) (including specialists on gender/gender-based violence and protection), Legal, Inspections and Investigations, Human Resources, Ombudsman, Communications and Media, Security and Ethics. It should include senior representation from regional bureaux and selected country offices.</i>	Ethics	Risk Management, Programme Delivery, Emergency Coordination, Programme Operations Department, Legal, Inspections and Investigations, Human Resources, Ombudsman, Communications and Media, Security, regional bureaux, country offices	High	Immediate (second quarter of 2024)
	1.2	Using the logic model presented in the evaluation report as the starting point, develop a PSEA implementation plan for 2024–2026, which will require the following: <ul style="list-style-type: none"> • consolidation of existing tools and guidance for PSEA that exist within WFP; • mapping of the PSEA architecture (headquarters, regional bureaux, country offices) to fulfil the commitments in the 2023 Executive Director’s circular; • clarification of mandatory requirements for PSEA within divisions and offices across WFP; 	Ethics	Gender, Protection and Inclusion, Risk Management, Programme Delivery, Emergency Coordination, Programme Operations Department, Legal, Inspections and Investigations, Human	High	Fourth quarter of 2024

⁵ To provide the necessary leadership for implementing recommendations, the independent evaluation team recommended that recommendations 1, 2, 3, 4, and 6 be led by the Office of the Executive Director. Following WFP’s February 2024 reorganisation, recommendations have been allocated to relevant capacitated divisions under the new structure, with senior leadership to ensure full responsibility and oversight for PSEA going forward.

	No.	Recommendation	Responsibility	Other contributors	Priority	Deadline
		<ul style="list-style-type: none"> analysis of the sufficiency of existing materials and identification of gaps; identification of linkages with programmes and technical staff in critical delivery areas such as school meals and cash-based transfers; sequenced articulation of processes and protocols for PSEA; an internal communications strategy; assessment and prioritization of risks and capacity needs for cooperating partners to meet PSEA commitments; establishment of mandatory minimum requirements for PSEA consideration within country strategic plans; and establishment of an agreed business continuity plan to ensure stakeholder confidence of vulnerable populations in the event of a spike in complaints. 		Resources, Ombudsman, Communications and Media, Security, regional bureaux, country offices		
CAPACITY AND RESOURCING						
IMMEDIATELY	2	In line with international obligations on PSEA and within available resources, commit sufficient capacity and resources at headquarters, regional bureaux and country offices for effective PSEA.	Office of the Chief of Staff			
	2.1	<p>Strengthen and elevate the formalized PSEA capacity and structure at the headquarters level by ensuring that the most senior PSEA post reports directly to the Chief of Staff or the Deputy Executive Director. This change in line management effectively requires the development of a PSEA Unit outside the Ethics Office but within the Office of the Executive Director with oversight of the cross-organizational PSEA task force. Allocate dedicated resourcing for PSEA, particularly at the country level, to bolster, accelerate and give visibility to ongoing commitments.</p> <p><i>Resourcing equivalent to at least 0.04 percent of every country budget, depending on operating environment, from the first quarter of 2024 through 2026. Prioritize immediate investment in technical support and related resourcing for high-risk contexts where significant retargeting exercises are taking place.</i></p>	Ethics	Human Resources, Risk Management	High	Fourth quarter of 2024

	No.	Recommendation	Responsibility	Other contributors	Priority	Deadline
	2.2	Immediately update the Performance and Competency Enhancement (PACE) system to include PSEA responsibilities for all country directors, deputy country directors, regional directors, deputy regional directors, heads of programme, PSEA focal points and other relevant staff, as already called for in the 2023 Executive Director's circular, and include PSEA as a core competency in PACE for managers.	Human Resources	Ethics	High	Fourth quarter of 2024
	2.3	As part of the 2024 organizational restructuring process, carry out workforce planning to ensure sufficient capacity across WFP and include PSEA roles and responsibilities within all relevant job descriptions to clarify staff responsibilities for the prevention of and response to SEA in how they do their jobs.	Human Resources	Ethics	High	Fourth quarter of 2024
	2.4	Further strengthen the PSEA focal points network, redouble training, reinvest in the community of practice and facilitate experience-sharing.	Ethics		High	Fourth quarter of 2024
LEADERSHIP AND CULTURE CHANGE						
IMMEDIATELY	3	Build on the opportunity presented by the IASC championship on PSEA and sexual harassment to enhance the visibility, priority and clarity of PSEA for WFP.	Office of the Executive Director			
	3.1	Convene senior management at the headquarters, regional and country levels to engage in annual facilitated reflections on organizational culture, abuse and exploitation of power. This should be led by the Executive Director and should prioritize the implications for the leadership and management levels before considering the broader organizational shifts required and how staff and stakeholder trust can be enhanced.	Office of the Executive Director	Chief of Staff, Leadership Group, regional bureaux, country offices	High	Second quarter of 2024
	3.2	Issue senior management advisories and guidance in the following areas: <ul style="list-style-type: none"> • clarification that prevalence of SEA reporting is indicative of a well-functioning system; • operationalization of the victim/survivor-centred approach; and • underlying causes of SEA, namely power imbalances and organizational culture. 	Ethics	Office of the Executive Director, regional bureaux, country offices	High	Second quarter of 2024

	No.	Recommendation	Responsibility	Other contributors	Priority	Deadline
	3.3	Lead IASC initiatives to operationalize a victim/survivor-centred approach. ⁶	Ethics	Gender, Protection and Inclusion , Senior Management Group, Security, Human Resources	High	Fourth quarter of 2024
	3.4	Require country offices to include an all-staff dialogue on PSEA in self-assessment processes as part of planning and regular and mid-year/end-year management reviews.	Risk Management	Senior Management Group, Ethics	High	Fourth quarter of 2024
POLICY DEVELOPMENT						
MEDIUM-TERM	4	Develop a PSEA policy and accompanying strategy by 2026 to formally affirm and elevate WFP's commitment to PSEA and to ensure that PSEA considerations fully inform the next strategic plan.	Office of Chief of Staff			
	4.1	<p>Develop a WFP policy on PSEA.</p> <p>Through a process of extensive consultation and reflection on what is needed to sustain and build trust among internal and external stakeholders and in terms of resources, guidance from the cross-organizational PSEA task force and oversight and approval from the Executive Board, the policy should:</p> <ul style="list-style-type: none"> • reflect on the underlying causes of PSEA, the cultural norms expected within WFP and the way leadership will engender and sustain this culture regarding sexual misconduct; • reinforce that SEA is to be expected in all contexts in which WFP operates, in recognition that all interventions involve a power differential, and recognize that an absence of complaints should result in management attention to determine why there are no complaints; • elaborate on the implications of delivering on a commitment to a victim-centred approach; 	Ethics	Programme Delivery; Gender, Protection and Inclusion	Medium	2026

⁶ Providing leadership for commitment 1 of the IASC vision and strategy 2022–2026 for the operationalization of a victim/survivor-centred approach.

	No.	Recommendation	Responsibility	Other contributors	Priority	Deadline
		<ul style="list-style-type: none"> articulate a detailed definition of zero tolerance on inaction on PSEA and what is therefore expected of all staff in terms of their own conduct as well as their individual roles and responsibilities; describe how WFP will fulfil the core IASC commitments for 2022–2026 on PSEA, emphasizing those on prevention; and formalize the minimum required PSEA architecture at the headquarters, regional and country levels. 				
PROGRAMMING AND OPERATIONS						
MEDIUM-TERM	5	Enhance the links between SEA risk assessment, programme design and implementation.	Programme Operations Department			
	5.1	Integrate SEA risk assessment into WFP's operational instruments and procedures so that it becomes an automatic part of WFP's work. Critical aspects include: <ul style="list-style-type: none"> integration of SEA risk in needs assessment, programme design and programme monitoring across all activity types; integration of SEA risk assessment across all delivery modalities (e.g. cash-based transfers); inclusion of PSEA within emergency preparedness and business continuity exercises and practice; and mandatory integration of PSEA into country strategic plan design and the strategic programme review process. 	Gender, Protection and Inclusion	Ethics; Risk Management Division; Delivery Assurance Service; Programme, Policy and Guidance; Analysis, Planning and Performance; Supply Chain and Delivery	Medium	Second quarter of 2025
	5.2	Regularly review the appropriateness of community feedback mechanisms in response to operational or contextual barriers and to enhance their utility, safety and accessibility for SEA victims.	Analysis, Planning and Performance	Programme Policy and Guidance, Risk Management, Supply Chain and Delivery	Medium	Second quarter of 2025
	5.3	Conduct an assessment of the risk profiles and capacity needs of current partnerships to understand how WFP should customize its approach at the country level and with different types of partners to better enable governments, community leaders, the	Gender, Protection and Inclusion	Ethics; Risk Management Division; Delivery Assurance Service; Programme Policy	Medium	Second quarter of 2025

	No.	Recommendation	Responsibility	Other contributors	Priority	Deadline
		private sector, financial service providers, third-party monitors, standby partners and others to ensure effective PSEA.		and Guidance; Analysis, Planning and Performance; Supply Chain and Delivery		
UNITED NATIONS-LED INTER-AGENCY EFFORTS						
MEDIUM-TERM	6	Ensure that WFP's role and contributions to inter-agency efforts are commensurate with WFP's operational size and strength, to support the development of PSEA global goods.	Deputy Executive Director			
	6.1	Reinforce WFP's role in PSEA within inter-agency partnerships by seeking opportunities to support inter-agency networks and action plans at the country level and providing support to activities agreed by the United Nations country teams/humanitarian country teams in the annual action plans.	Gender, Protection and Inclusion	Ethics, Emergencies, Programme Delivery	Medium	Fourth quarter of 2025
	6.2	Leverage WFP's position and opportunity within global leadership platforms (e.g. the food security and livelihoods, logistics and emergency telecommunications clusters; the private sector partnership portfolio; and cash-based transfers) to ensure that PSEA is part of the approach and coordination efforts. Specifically, this will include: <ul style="list-style-type: none"> • advocacy by WFP-led clusters with cluster members on PSEA responsibilities; • inclusion of PSEA in design and assessments; and • coordination of cluster training on PSEA and PSEA awareness-raising. 	Gender, Protection and Inclusion	Emergencies; Ethics; Programme Operations Department; Workplace Management	Medium	Fourth quarter of 2025

1. Introduction

This report concerns the World Food Programme (WFP) Strategic Evaluation of Protection from Sexual Exploitation and Abuse (PSEA). The Office of Evaluation (OEV) contracted Itad Ltd. to undertake the evaluation.

1.1. Evaluation features

1.1.1. Rationale

70. This strategic evaluation (the evaluation) takes place six years after the United Nations (UN) Secretary-General (SG) called for a United Nations system-wide approach to addressing sexual exploitation and abuse (SEA) in 2017⁷ and following 20 years of diverse efforts by WFP to address protection⁸ from sexual exploitation and abuse (PSEA).⁹ This is the first WFP evaluation to consider PSEA as a subject.

71. The evaluation assesses how WFP has addressed its commitments on PSEA. These largely derive from United Nations system-wide and Inter-Agency Standing Committee (IASC) commitments. Sexual exploitation and abuse is a serious risk to the people WFP seek to serve, a violation of humanitarian principles and could cause damaging ethical and reputational risk to WFP. This evaluation reflects on what has worked and where efforts can be further strengthened. The summary terms of reference (ToR) are attached in Annex 1.

1.1.2. Objectives

72. This evaluation has the dual objectives of learning and accountability, with an emphasis on the former in prioritizing learning for improved PSEA at all levels.

73. **Learning:** The evaluation assesses how, why, and under what conditions (including through inter-agency efforts), the WFP approach to PSEA has been effective. It also considers where there remain opportunities to strengthen PSEA. The Office of Evaluation and the evaluation team facilitated learning throughout the evaluation process via stakeholder workshops and debrief opportunities.

74. **Accountability:** The evaluation measures the evolving capacity of WFP to meet PSEA commitments while responding to system-wide commitments to PSEA. The evaluation focuses on the relevance of the WFP approach to PSEA, as well as support to partner and inter-agency engagement.

1.1.3. Scope of the evaluation

75. The evaluation covers WFP PSEA activity and progress between March 2017 and October 2023 although WFP, in common with all other agencies, funds and programmes of the United Nations has been committed to implementing the Secretary-General's bulletin (SGB) since WFP Issued the Executive Director circular ED2004/001¹⁰ in January 2004.¹¹

76. Protection refers to activities to prevent, reduce, mitigate and respond to the risks and consequences of violence, coercion, deprivation and abuse for persons, groups and communities.¹² The 2023 WFP Executive Director's PSEA circular provides definitions of both sexual exploitation and of sexual abuse¹³ aligned with the 2003 Secretary-General's bulletin. The 2023 Executive Director's circular also explains that, for WFP, sexual exploitation and abuse refers to acts committed by WFP employees or cooperating partners against communities served by

⁷ 2017. Secretary-General. Special measures for protection from sexual exploitation and abuse: a new approach. [N1705400](#).

⁸ Protection refers to measures taken to protect vulnerable people from SEA and to respond to any act of SEA.

⁹ 2003. Secretary-General's bulletin. Special measures for protection from sexual exploitation and abuse. [N0355040](#).

¹⁰ ED2004/001 is currently not available online.

¹¹ Detail about the SGB is provided in para 11 and 12.

¹² 2020. WFP Protection and Accountability Policy.

¹³ Sexual abuse is defined as: the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. As a child cannot provide consent, any act of sex involving a child is considered sexual abuse. Sexual exploitation is defined as: any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. These rules also apply outside working hours.

WFP and that PSEA obligations are part of a broader duty of care to communities receiving assistance from WFP to promote their safety and treat them with dignity and respect. Across the sector, more commonly, sexual exploitation and abuse can be perpetrated against any adult or child – even if they are not part of communities served by a humanitarian agency – if the perpetrator is charged with the delivery of humanitarian assistance. This latter, fuller, definition is the one adopted by this evaluation. Additionally, as acts of sexual exploitation and abuse relate to an imbalance of power and existence of vulnerability, United Nations offices such as the Office for Victims' Rights Advocate have advised that it is possible for WFP staff, or staff of partners, to be victims of SEA.¹⁴

77. Sexual harassment (SH), covered by the Abusive Conduct Policy, is treated by WFP as acts most often committed by WFP employees against other WFP employees and related to “conduct occurring in the workplace or in connection with work for WFP”. It can relate to situations where the WFP employee will be either the affected person or the perpetrator and the action taken by WFP will depend upon the status of the persons concerned. Sexual harassment was not included in the scope of this evaluation.¹⁵

78. The evaluation has five areas of focus linked to evaluation questions (see Figure 2): (i) assessing WFP progress and coherence with international PSEA commitments and the WFP normative framework; (ii) reviewing how capacities and assets for PSEA are facilitated; (iii) examining PSEA coordination with the full range of WFP partners; (iv) determining the delivery of results on PSEA; and (v) understanding how WFP is adjusting to PSEA in a changing operational environment.

79. The intended users of the evaluation include all WFP divisions and units at headquarters, Executive Board members, regional bureaux (RB), country offices (CO) and field offices, as well as WFP partners, communities served by WFP, donors and other actors in the humanitarian and development sector.

1.2. Context

1.2.1. External context

80. PSEA has been a priority for humanitarian leaders since 2002, when the IASC issued the Six Core Principles.¹⁶ This was followed by the 2003 Secretary-General's bulletin, which prohibits sexual exploitation and abuse by United Nations staff and mandates reporting of sexual exploitation and abuse -related concerns, and the 2012 IASC Minimum Operating Standards-PSEA (MOS-PSEA). Annex 11 provides a timeline of key events in the development of PSEA normative guidelines and statements on PSEA.

81. In March 2017, the Secretary-General outlined a four-pronged strategy¹⁷ to prevent and respond to sexual exploitation and abuse across the United Nations system. The 2021 IASC External Review noted that from 2016, the increase in quality and quantity of international policy and standards, and the production of guidance and tools were significant. One result of this was to pose an incremental challenge for agencies that were not investing capacity over time in meeting these increased agreed commitments and standards.¹⁸

1.2.2. Internal sexual exploitation and abuse context

82. The WFP approach to PSEA derives from the Secretary General's bulletin, the Core Principles and from the IASC MOS-PSEA. WFP considers sexual exploitation and abuse to be “acts of gross misconduct” constituting grounds for termination of employment. WFP has been consistent in adopting a “zero tolerance” stance toward sexual exploitation and abuse and considering PSEA to be a “moral imperative”. WFP issued the first Executive Director (ED) circular on PSEA in 2004, with subsequent Executive Director circulars in 2005, 2013, 2014, and 2023. All circulars are consistent in being rooted in these core system-wide United Nations and IASC principles while introducing new detail and additional responsibilities over time.

¹⁴ Consultations provided by Office of Victim Rights Advocate during the course of the evaluation.

¹⁵ 2023. WFP Protection from Sexual Exploitation and Abuse.

¹⁶ The 2002 IASC Six Core Principles were updated in 2019. Six Core Principles Relating to Sexual Exploitation and Abuse. [IASC/PSEA](#).

¹⁷ United Nations.2023. Fact sheet on the Secretary-General's initiatives to prevent and respond to sexual exploitation and abuse.

¹⁸ The 2010 IASC Review confirmed WFP's commitment to the SGB by signalling that WFP, like many other organizations benchmarked during the Review, including other UN agencies, funds and programmes, Red Cross and Red Crescent Movement, and INGOS had already required personnel to sign a Code of Conduct in line with the SGB and had issued policy requiring compliance with the SGB and Core Principles.

83. In May 2023, it was announced that the WFP Executive Director, Cindy McCain, would take up the IASC Championship of Protection from Sexual Exploitation and Abuse and Sexual Harassment to “lead in bolstering efforts to create a humanitarian system free from sexual misconduct.”¹⁹

84. Between 2019 and 2022, an additional 17 percent more people were affected by chronic hunger globally while food procurement costs rose by 39 percent and WFP expanded its efforts to respond to these increasing humanitarian needs. These efforts were supported by donors, resulting in a record contribution revenue of USD 14.1 billion in 2022. Simultaneously, the ability of WFP to deliver was challenged by a significant reduction in contributions from USD 14.1 billion in 2022 to USD 8.3 billion in 2023.²⁰ WFP is committed to efforts to mitigate the impact of this significant funding cut upon vulnerable communities.

85. Redoubling efforts on PSEA is particularly important as cuts to assistance will increase vulnerability to exploitation at the community level.²¹ Such increased vulnerability intensifies power imbalances between aid providers and communities. This significantly increases the risk of sexual exploitation and abuse – and particularly of sexual exploitation in the form of negative coping strategies such as transactional and survival sex. The implementation of such major cuts to assistance exponentially raises the risks of SEA across all WFP programmatic delivery. This has potentially grave consequences for vulnerable people, beneficiaries, partners and WFP corporately.

86. The WFP Management Plan (2024–2026) outlines how WFP will manage the risk of diversion and misappropriation of aid while undertaking retargeting and reprioritization.²² It should be expected that reduction of humanitarian assistance and safety nets, and any retargeting and reprioritization efforts, will increase vulnerability to sexual exploitation and abuse. With retargeting and reprioritization at a global scale there is a substantial risk exposure to sexual exploitation and abuse requiring planning for mitigation. There may be an increase in sexual exploitation and abuse complaints. Alongside increased risk to vulnerable people, and the potential for increased sexual exploitation and abuse cases, is therefore also potential risk to the reputation of WFP and a potential risk related to paused or further decreased funding.

1.2.3. Gender, equity and inclusion context

87. Sexual exploitation and abuse is a form of gender-based violence (GBV) that constitutes an abuse of power by aid workers (or cooperating partners) against an affected population. It is based in gender inequality and power imbalances. This framing is mirrored in the WFP Strategic Plan (2022-2025), where sexual exploitation and abuse is recognized as a form of gender-based violence carried out by WFP staff and partners against beneficiaries served by WFP.

88. PSEA is addressed in the 2022 Gender Policy, and it is outlined as the third of four interconnected and complementary priorities as “enhanced protection to ensure safety, dignity, and meaningful access”. Connections between high-level PSEA commitments and other equity and diversity ambitions are not explicit. This is despite recognition that persons with disability are at heightened risk of sexual exploitation and abuse and may face more challenges in accessing reporting systems.²³

1.3. Subject being evaluated

89. The primary strategic and policy direction for PSEA within WFP has come from successive Executive Director’s circulars. “The Executive Director’s Circular on Protection from Sexual Exploitation and Sexual Abuse (PSEA) (OED2023/011), which superseded OED2014/020, is the current WFP ‘policy’ framework to regulate its approach to PSEA.”²⁴ The circular highlights the WFP approach of “zero tolerance for inaction on all forms of sexual exploitation and abuse”. The evaluation refers to OED2014/020 in many cases as this was the dominant ‘policy’ in effect during most of the period being considered by the evaluation.

¹⁹ IASC. 2023. IASC Championship of Protection from Sexual Exploitation and Abuse and Sexual Harassment.

²⁰ WFP. 2023. Contributions to WFP. <https://www.wfp.org/funding/20232023>.

²¹ GBV AoR. 2021 Gender-Based Violence in Emergencies. GBV AoR HD – Food Insecurity, Famine and GBV -19112021.pdf (pg. 6).

²² [WFP-0000151658](#).

²³ UNICEF. Disability inclusion in Accountability to Affected Populations. [Disability Inclusive Toolkit](#).

²⁴ WFP. 2023. Protection from Sexual Exploitation and Sexual Abuse (PSEA) (supersedes OED2014/020).

90. The WFP Strategic Plan (2022-2025) outlines three key strategies for PSEA: (a) integrating PSEA measures into operations and programming; (b) incorporating PSEA sensitization into core training; and (c) enhancing coordination with key stakeholders at all levels to prevent, respond to and mitigate sexual exploitation and abuse effects through a victim-centred approach (VCA).

91. In terms of the institutional arrangements to deliver on these commitments, the 2023 Executive Director's circular on PSEA²⁵ reinforces the Ethics Office's role in implementing prevention measures across the organization. The Ethics Office (ETO) has held this role since 2018. The Ethics Office also represents WFP at a technical level in United Nations system-wide collaboration for PSEA, as well as in the IASC. These responsibilities are detailed in the (internal) 2021-2023 Ethics Office Strategy for PSEA, which guides the approach of the Ethics Office. It lists the Ethics Office aims as: (i) to capacitate WFP employees and partners with knowledge and skills to identify, prevent and respond to SEA; (ii) to enhance policies, processes and procedures and ensure accountability and a VCA; (iii) to expand PSEA mainstreaming across WFP; (iv) to use data to identify opportunities for mitigation and preventive actions; and (v) to maintain and enhance the WFP role at United Nations, inter-agency and regional bureaux levels. As of 2023, the Ethics Office is involved in the country strategic plan (CSP) review process to consider how PSEA is considered in CSP design.^{26,27}

92. The stipulations on special measures for protection against sexual exploitation and abuse in the 2014 Executive Director circular clarified for the first time that they were to be applied to all WFP employees.²⁸ It has also been clear since 2014 that these stipulations apply to all activities and operations of WFP, including any project funded by WFP, and any project implemented by WFP and any government agency and cooperating partner. The stipulations extend to situations of sexual exploitation and abuse that occur at or away from the workplace, during or outside working hours.

93. In 2014 the expectations on focal points were restated and expanded upon. All country offices and regional bureaux were required to ensure that a PSEA focal point and an alternate were in place. The country PSEA focal point should be the deputy country director where possible, otherwise the most senior WFP employee aside from the head of office. At the regional level, the PSEA focal point should be a senior WFP employee, "P4" level or equivalent.²⁹ A network of focal points³⁰ operates at regional bureau, country office and field office levels. PSEA focal points hold responsibility for a variety of PSEA-related tasks at these levels. These are outlined under four broad categories as part of the WFP PSEA focal point terms of reference: (1) awareness-raising for the prevention of sexual exploitation and abuse; (2) safe reporting and inter-agency collaboration; (3) responding to reports of sexual exploitation and abuse; and (4) management and coordination. The PSEA focal points' survey conducted by the evaluation team (see Annex 9) also asked about the responsibilities of focal points, which did not replicate with the contents of the terms of reference.

94. The importance of duty of care for affected communities and beneficiaries was reinforced in the 2014 Executive Director circular,³¹ which then comprehensively detailed and updated WFP expectations regarding implementation of PSEA obligations to all employees globally. When the 2014 circular was replaced by the May 2023 Executive Director circular,³² it was stated that "WFP prioritizes prevention of sexual exploitation and abuse in its activities and operations as well as effective response based on a victim-centred approach when SEA violations are alleged."

95. Budgeting and expenditure details for PSEA at headquarters and country office levels were available to the evaluation team in only a limited number of contexts following detailed engagement with the relevant country

²⁵ WFP. 2023. Protection from Sexual Exploitation and Sexual Abuse (PSEA) (supersedes OED2014/020). https://executiveboard.wfp.org/document_download/WFP-0000149712.

²⁶ WFP. Programme Review and Approval Process ToR.

²⁷ See for example WFP. 2022. Mozambique Country Strategic Plan (2022-2026) WFP/EB.A/2022/8-A/3*, WFP. 2022. Pakistan Country Strategic Plan (2023-2027) WFP/EB.2/2022/7-A/9/Rev.1., WFP. 2022. South Sudan Country Strategic Plan (2023-2025) WFP/EB.2/2022/7-A/11.

²⁸ Specifically, this includes international professional staff members, general service staff members, consultants, interns, contract workers, external service providers, volunteers, locally recruited staff members, United Nations volunteers, and persons recruited on special service agreements (SSA) and service contracts (SCs).

²⁹ WFP. 2023. Annex 2 PSEA Focal Point Terms of Reference Protection from Sexual Exploitation and Sexual Abuse (PSEA) (supersedes OED2014/020). https://executiveboard.wfp.org/document_download/WFP-0000149712.

³⁰ 532 focal points as of 18 September 2023 – based on the PSEA focal point survey email list which was provided by the Ethics Office.

³¹ WFP. 2014. Executive Director's Circular OED2014/020 (superseded by OED2023/011).

³² WFP. 2023. Protection from Sexual Exploitation and Sexual Abuse (PSEA) (supersedes OED2014/020).

offices. In terms of human resources, at headquarters, there is now a team of six staff in the Ethics Office dedicated to PSEA (see Annex 15 for a breakdown of the evolution of the team) although for most of the period covered in this evaluation, the Ethics Office PSEA team has been smaller.³³ The human resource, provided through the network of focal points, spend a varied range of time on PSEA (ranging from less than 10 percent to more than 50 percent of total working hours (see Annex 9).

96. PSEA has not been a focus of WFP evaluations. Nonetheless, recent evaluations of CSPs and audits note challenges related to the mainstreaming of PSEA in programming.³⁴

1.4. Methodology, limitations and ethical considerations

97. The detailed methodological design took place during the inception phase of this evaluation (February-July 2023). A comprehensive description of the methodology is given in Annex 3.

1.4.1. Logic model framing & Evaluation Questions

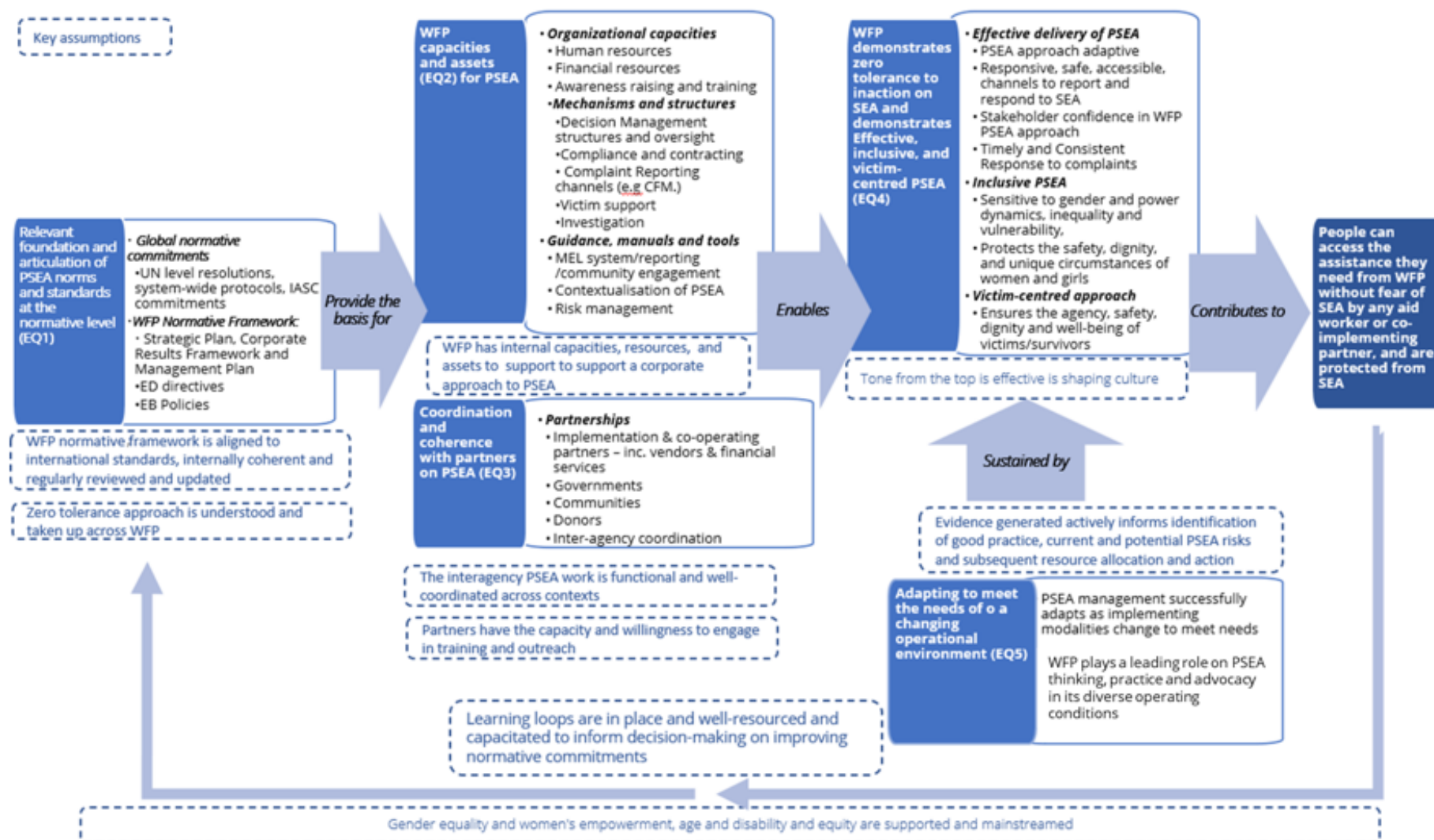
98. As WFP does not have a theory of change framing its overall approach to PSEA the evaluation team developed a preliminary logic model (see Figure 1 below).³⁵ This supported analysis of 'what good looks like' in terms of PSEA for WFP. A revised model of the logic model can be found in Annex 4. The five key components of the model match the evaluation questions and lead to the overarching goal of the PSEA system: "People can access the assistance they need from WFP without fear of SEA by any aid worker or cooperating partner and are protected from sexual exploitation and abuse".

³³ As of 30 January 2024, the team consists of four staff members.

³⁴ For example, WFP country strategic plan evaluations for Cambodia, Dominican Republic, South Sudan, Haiti, Malawi, Burkina Faso, Namibia.

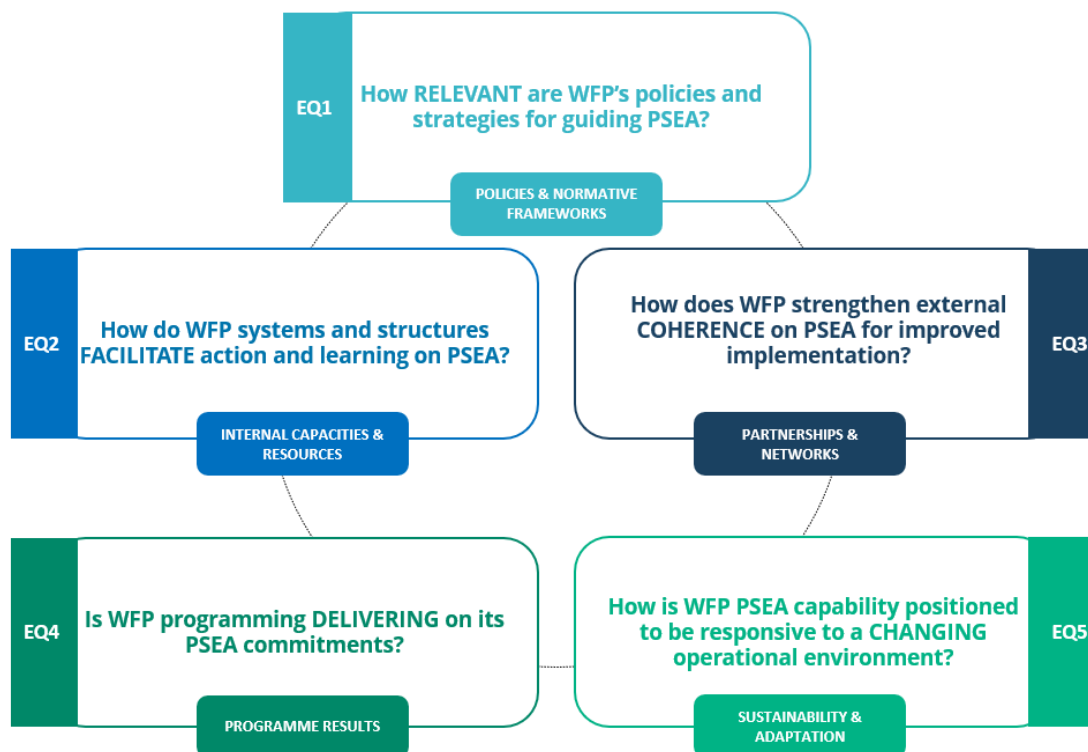
³⁵ Logic model developed during inception phase. For a revised version of the logic model please see annex 4.

Figure 1: Logic Model



99. Figure 2 illustrates the logic model summary aligned with the evaluation questions (EQs). Component 1 evaluates the WFP normative framework against international standards and best practices. Component 2 (linked to EQ2) assumes WFP norms shape country plans, programme design, risk management and resource allocation. Component 3 (linked to EQ3) emphasizes coordination with partners for PSEA initiatives. Component 4 (EQ4) relies on the synergy between the second and third components to demonstrate 'zero tolerance' to sexual exploitation and abuse. Component 5 (EQ5) operates alongside Component 4, acknowledging the evolving notion of "good practice" in PSEA.

Figure 2: Simplified logic model and the evaluation questions



1.4.2. Methodology

100. The evaluation used a systems-based framing to understand the interconnectedness and complexity of the system in which PSEA operates. It utilized a mixed methods approach combining quantitative and qualitative analysis. The evaluation questions were originally proposed by the Office of Evaluation in the terms of reference, and then modified during the inception phase.

101. Annex 5 presents the evaluation matrix. It notes indicators, linkages to findings and data sources that were utilized during the evaluation.

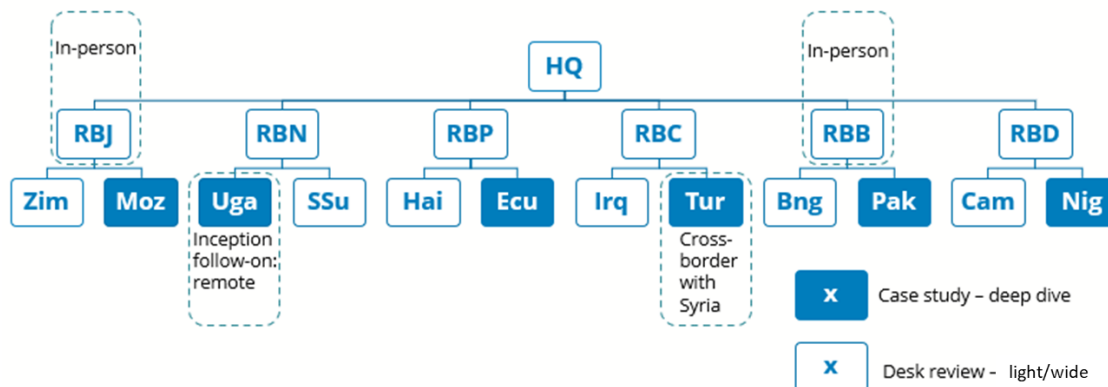
102. The evaluation was informed by six evidence sources: (1) a desk review; (2) country visits, with key informant interviews and focus group discussions with beneficiaries across seven WFP country offices;³⁶ (3) a comparative exercise comparing best practice on PSEA in UNICEF and UNHCR; (4) a thematic review of cash and cash-based transfers (CBTs), the localization agenda, access issues and school feeding; (5) global and regional key informant interviews; and (6) a global survey of WFP PSEA focal points. For a detailed summary see Annex 10.

103. Over 1500 documents were considered as part of the **desk review**, comprising country level, regional and corporate documentation. This included WFP commitments, sector-wide normative statements and best and promising practices.

³⁶ Pakistan, Türkiye, Nigeria, Mozambique, Ecuador, northwest Syria and Uganda.

104. The **in-country case studies** included a purposive sample of contexts identified during inception to assess PSEA within the diverse programming and operational contexts of WFP. Figure 3 below shows the in-country case studies, and the wider sample for desk reviews.

Figure 3: Selection of country offices and regional bureaux for case studies and desk reviews³⁷



105. **Comparative exercises** were undertaken with UNHCR and UNICEF as organizations comparable to WFP with respect to their humanitarian mandate.³⁸ In 2021, almost half of international humanitarian assistance funds allocated to organizations went to WFP, UNHCR and UNICEF.³⁹

106. **Assessments of how PSEA commitments were expressed and operationalized across four key themes** of WFP work (cash-based transfers, localization, hard-to-access locations and school feeding) were conducted.

Box 1: Overview of themes

The evaluation team focused on four thematic areas concerning WFP operations to assess PSEA adaptation to identified risks (for details, see Annex 3). Firstly, it analysed the substantial rise in **cash transfers**, reaching a record USD 2.3 billion expenditure in 2021, aiding 41 million individuals across 69 countries. This shift in modality may entail varying risk levels, necessitating tailored measures for modality-specific sexual exploitation and abuse risks. Secondly, it looked at '**localization**' in the humanitarian sector, evaluating WFP efforts to support local actors in meeting PSEA commitments, and in addressing underlying causes of misconduct. Thirdly, it examined **humanitarian access**, particularly WFP PSEA oversight in contexts with limited access. Lastly, it explored **school feeding** programmes to ascertain how WFP upholds PSEA commitments within the three primary school feeding models currently employed. These themes are interwoven throughout the report rather than confined to a specific chapter.

107. **Key informant interviews at global and regional levels** and the **global survey of PSEA focal points** came towards the end of data collection to validate operational findings. The survey aimed to triangulate evidence regarding overall confidence of WFP focal points in PSEA systems as well as the role of PSEA focal points within the broader risk context for sexual exploitation and abuse.

108. The five data collection tools mentioned primarily gather qualitative evidence. However, WFP also collects quantitative indicators through the community feedback mechanism (CFM) and community engagement (CE)

³⁷ Regional Bureaux: RBB: RB for Asia and the Pacific; RBC: RB For The Middle East, Northern Africa And Eastern Europe; RBD: RB for Western Africa; RBN: RB for Eastern Africa; RBJ: RB for Southern Africa; RBP: RB for Latin America and the Caribbean;

³⁸ The evaluation team took into account that UNHCR and UNICEF have a protection mandate. Obligations remain the same regardless of a protection mandate or protection capacity.

³⁹ ALNAP. 2022. The State of the Humanitarian System report.

surveys, staff surveys, management key performance indicators (KPIs), and emerging quantitative data from the PSEA focal point survey. Additional quantitative data stems from the human resources (HR) training module uptake, investigations and budget assessments. Due to the nascent state of quantitative PSEA measurement within WFP and the sector, the evaluation team prioritized qualitative evidence, drawing from documentation and first hand experiences of WFP staff and stakeholders.

109. The evaluation team applied a **gender- and equity-responsive lens**, including following guidance on “Integrating Human Rights and Gender Equality in Evaluations” and WFP commitments on gender equity and women’s empowerment (GEWE) as per the WFP Gender Policy and the Office of Evaluation guidance on integrating GEWE into evaluations.⁴⁰ The team ensured that relevant evaluation sub-questions were analysed based on the Gender Results Effectiveness Scale (GRES).⁴¹ The data gathering approaches included a disaggregation of data by sex and gender so that the evaluation team could monitor for any potential bias linked to associated difference during the analysis stage of the evaluation. Where data were available, analysis was conducted with consideration of the intersection of sex, gender, age, vulnerability and disability. The equity lens of the evaluation was applied in inquiries related to the degree to which risk management, community engagement processes and monitoring systems catered for the differing ability of vulnerable groups and at-risk populations to engage in discussions on PSEA, and how these persons are responded to via the PSEA framework.

1.4.3. Validation, triangulation and synthesis

110. Following each desk review and country visit, a **feedback session** was undertaken with the country offices to which country directors, deputy country directors, alternate PSEA focal points, and Office of Evaluation staff were invited, and fact checking was conducted.

111. The team triangulated across all evidence sources and weighed the strength of evidence for each indicator against the evaluation matrix (see Annex 5). Dedicated templates for each country review as well as each evaluation question included preliminary findings, location of findings (headquarters, regional bureau, country office), an associated confidence rating, and the connection to the appropriate evaluation sub-question.

112. The preliminary findings were presented to the Office of Evaluation in a one-day workshop, which was followed by presentations of these preliminary findings to members of the internal reference group (IRG). The draft evaluation report was quality assured by the Office of Evaluation and was shared with the internal reference group and the external advisory group (EAG) for comment. Following this, a final hybrid stakeholder workshop was conducted with members of the internal reference group in February 2024 to finalize the recommendations.

1.4.4. Key limitations

113. **WFP does not have a theory of change for PSEA.** As a proxy for this, the evaluation team developed the preliminary logic model (Figure 1), against which assumptions of what WFP has in place to deliver on PSEA commitments were tested. Although it was included in the inception report, this logic model has not been through a process of in-depth consultation with WFP stakeholders.

114. **Data collection from communities was more limited than initially planned**, with one visit⁴² not having any community engagement. Mitigation efforts included increasing the size of the evaluation team in Mozambique and undertaking more focus groups in that context.

115. **WFP has limited institutional memory of how PSEA was addressed, institutionalized and supported prior to 2018**, except for within the Office of Inspections and Investigations (OIGI). Internal or external interviewees were not able to clarify how policy and guidance put in place before 2018 was developed or supported, other than anecdotal recollections and descriptions of “tone at the top”. As the scope of the evaluation is from 2017 onwards, this has not been a significant limitation, although it limits analysis of the 2014 Executive Director circular, which was the critical WFP policy instrument between 2018 and 2022.

116. **The evaluation team did not knowingly have any contact with sexual exploitation and abuse victims.** This was a decision taken by WFP in inception as the WFP Office of Evaluation and the Ethics Office felt that it

⁴⁰ Including the United Nations Women ‘Evaluation Handbook: How to manage gender-responsive evaluation’ and the WHO guidance ‘Putting Women First: Ethical and safety recommendations for researching, documenting, and monitoring sexual violence in emergencies.

⁴¹ UNDP. 2015. IEO’s Contribution to Gender Equality and Women’s Empowerment Evaluation.

⁴² Türkiye and northwest Syria.

would not be possible for country offices to ensure safety and confidentiality.⁴³ This significant limitation is acknowledged, as is the absence of a “victim voice” in this report.

117. **The inception period was extended to revise the evaluation scope**, removing investigation and case management to prevent overlap with other ongoing corporate exercises and overburdening country offices.⁴⁴ Data collection tools were adjusted accordingly, and stakeholders were informed about the scope change. However, unsolicited feedback on investigation and case management was received. Thus, 'perceptions' of progress in these areas are included. The evaluation team upholds the United Nations Evaluation Group (UNEG) Pledge of Ethical Conduct in Evaluations and remains independent in evaluating the weight of such evidence alongside the Office of Evaluation.

118. **There was a consolidation of data collection and analysis phases.** Due to the extension of the inception phase, a compressed data collection and analysis process was required. This was mitigated by: the evaluation team’s intensified commitment; the Office of Evaluation turnaround of comments being shorter than planned, and an additional workshop with the Office of Evaluation prior to the internal reference group analytical findings workshop.

119. **There was limited engagement with external stakeholders due to the reduced data collection period.** Any potential bias occasioned by the focus on internal stakeholders was mitigated by consultation with the Executive Board and donors and also through systematic headquarters-level to country-level consultation with the compared peer agencies (UNICEF and UNHCR), with the inter-agency networks in each country visited, and with peer technical actors in cash-based transfers and school feeding. Selected partners and communities were also consulted in each country visited through interviews and focus groups, although it is recognized that they may have felt constrained in discussing PSEA in such groups.

120. **There was an obligation to report ‘concerns or suspicions’ of sexual exploitation and abuse incidents.**⁴⁵ As per the UNEG ethical guidelines, the evaluation team reminded all interviewees of the obligation upon the evaluation team for them to report, and to refer to appropriate channels, in the event of the interviewee sharing information about any sexual exploitation and abuse events. Issuing such a caution at the start of each interview could have limited the information received regarding WFP delivery of its victim-centred approach commitments, as well as more broadly across the areas of inquiry.

1.4.5. Ethical considerations

121. PSEA evaluations are sensitive and require the application of robust ethical principles to ensure the protection of participants and the integrity of the evaluation process.⁴⁶ The evaluation team has drawn upon multiple internal and external ethical guidelines complementary to PSEA, given that best practice on evaluative conduct relating specifically to PSEA is still emerging.

122. The evaluation conformed to 2020 UNEG ethical guidelines including safeguarding and ensuring ethical conduct at all stages of the evaluation cycle. This includes, but is not limited to, ensuring informed consent, protecting the privacy, confidentiality and anonymity,⁴⁷ where possible, of participants, ensuring cultural sensitivity, respecting the autonomy of participants, ensuring fair recruitment of participants (including women and socially excluded groups) and ensuring that the evaluation results in no harm to participants or their communities. Itad has developed a comprehensive document, “Itad’s Ethical Principles for Evaluations”, which sets a standard to which all Itad staff, consultants and partners adhere when working on monitoring, evaluation and learning projects. Itad’s internal Safeguarding, Ethics and Data Committee (SEDC) was also involved at critical stages of the evaluation to enable, support and verify the application of Itad’s ethical principles and safeguarding policy at every step.⁴⁸

⁴³ As per the UN Glossary on Sexual Exploitation and Abuse (2017), confidentiality is defined as “The disclosure of certain information is restricted.”

⁴⁴ A parallel audit of PSEA was planned via the Office of Internal Audit (OIGA).

⁴⁵ WFP. 2023. Protection from Sexual Exploitation and Sexual Abuse (PSEA) (supersedes OED2014/020).

⁴⁶ 2019. United Nations. Conducting ethical research on sexual exploitation and abuse.

⁴⁷ As per the UNTERM glossary, anonymity is defined as: “The situation in which someone’s name is not given or known”.

⁴⁸ Submission of Itad’s ethical principles and safeguarding policy was included in the bid for this evaluation.

123. In the case of sexual exploitation and abuse incidents and associated disclosures made, or indicated, during the evaluation process, the evaluation team was committed to referring to Itad's reporting and referral process as well as the reporting guidelines in the WFP Executive Director circular (and associated annexes).

2. Evaluation findings

2.1. EQ1. How relevant are WFP policies and strategies for guiding PSEA?

124. The 2023 Executive Director circular⁴⁹ on PSEA represents a significant update from the commitments in the 2014 circular. To meet these commitments without an accompanying strategy or a detailed and resourced implementation plan poses a challenge for the organization. The purpose of the Executive Director circular is to provide an administrative update. As such, it does not lend itself to policy discussion. This means that it cannot provide substantive analysis of these updates, of the underlying power imbalances that enable PSEA, and of the need for organizational culture change. The circular does not articulate that a risk of sexual exploitation and abuse is present in all contexts, including those where WFP provides direct or technical assistance. There is an absence of an implementation plan to deliver upon the new articulation of the commitments.

2.1.1. EQ1A. How well aligned are WFP policies and strategies to international good practice and normative standards on PSEA?

125. **Finding 1: The 2023 Executive Director circular represents a necessary 'refresh' of an ongoing process for WFP to provide a clear statement of intent to deliver on United Nations system-wide and IASC commitments from the last decade. However, several updated United Nations and IASC commitments, including to a victim-centred approach, are not fully defined nor are the operational implications examined.**

126. Since 2004, WFP Executive Director circulars, rather than Executive Board approved policy, have provided clearly outlined administrative and management expectations. These have been in line with the Secretary-General's bulletin and IASC commitments at the time of drafting the circulars (see Figure 4 for a map of WFP policy landscape and its hierarchy). As an agency of the United Nations, WFP is subject to United Nations-wide commitments and, as an IASC Principal, the WFP Executive Director endorsed all IASC commitments, strategies and action plans.

127. The successive Executive Director circulars have become more detailed and clearer in tone and language (as per paragraph 13, the first circular was issued in 2004, with subsequent Executive Director circulars in 2005, 2013, 2014, and 2023). Between 2014 and May 2023, WFP relied on the 2014 Executive Director circular,⁵⁰ which formed the basis for WFP policy and practice during the period covered by this evaluation until May 2023 when the revised Executive Director circular was issued. In this period, the humanitarian and development sector significantly increased its commitment to PSEA, resulting in an evolved policy environment, enhanced standards and an improved quality of practice of PSEA.

128. The 2023 Executive Director circular on PSEA is an overall appropriate measure that has significantly updated the WFP normative policy framework on PSEA. It is an instrument aimed at regulating the organization and setting the legal framework within which WFP should operate. It communicates a range of important 'new' commitments to WFP staff that will advance WFP PSEA practice if appropriate effort is made to fully embed the commitments into practice. For example, it states that WFP has adopted the commitment to "zero tolerance for inaction" on sexual exploitation and abuse, which is now the international norm as opposed to "zero tolerance" of sexual exploitation and abuse.⁵¹ However, it also contains several gaps. For example, it defines zero tolerance for inaction solely as follows: "if an allegation of sexual exploitation and abuse comes to the attention of WFP, it will be addressed promptly, justly",⁵² while not linking prevention or risk mitigation activities to this commitment. While the Executive Director circular outlines the expected behaviour of WFP staff regarding PSEA commitments, it does not articulate more broadly that zero tolerance for inaction should influence how every member of staff conducts

⁴⁹OED2023/011712, OED2013/025 (supersedes OED2014/020), OED2005/004, OED2004/001.

⁵⁰ OED2013/014.

⁵¹ Zero tolerance to inaction on SEA is the language adopted by the IASC vision and strategy on PSEAH 2022-2026 and has been adopted by several member states including the United States (2022) and the United Kingdom (2022).

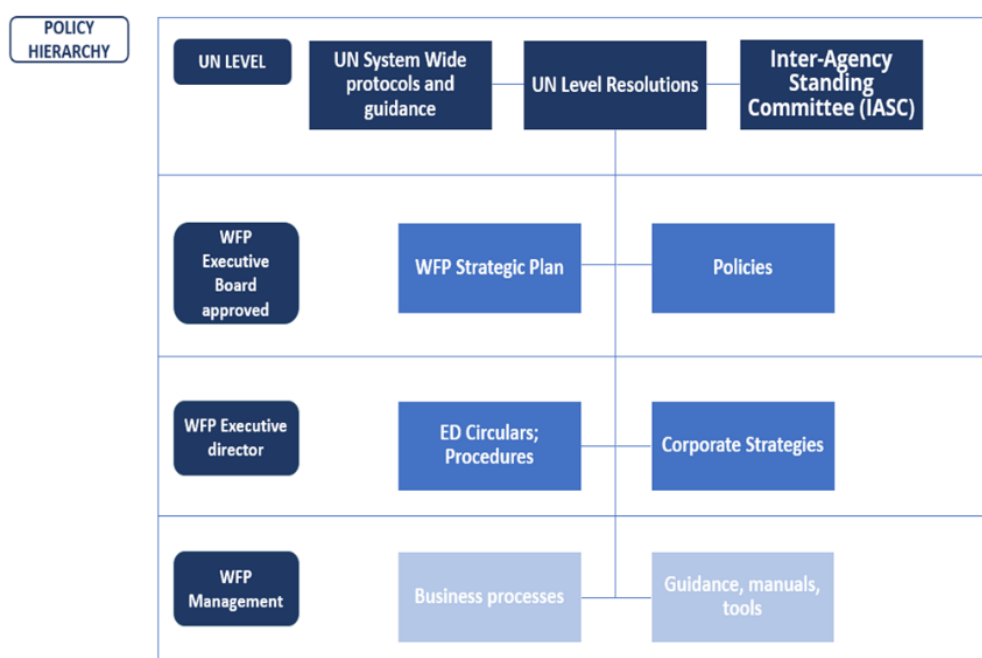
⁵² WFP. 2023.OED2023/0112.

themselves and how they carry out their role and responsibilities.⁵³ It also does not relay that zero tolerance for inaction should be demonstrated in programming design and delivery.⁵⁴

129. The victim-centred approach was mentioned for the first time in the Ethics Office PSEA strategy,⁵⁵ and in the 2023 Executive Director circular. It is described as “one for which the victim’s dignity, experiences, considerations, needs, and resiliencies are placed at the centre of the process to respond to an allegation of SEA” in line with the 2019 protocol from which the circular’s definition of “victim” is also taken. During country visits, it was consistently the case that non-PSEA, or non-gender and protection specialists understood a victim-centred approach to relate to the provision of assistance, or services, alone. It was not held to refer to victim rights or how the organization would be obligated to engage with the victim. The IASC “Definition & Principles of a Victim/Survivor Centred Approach”⁵⁶ was endorsed by the IASC members in June 2023 immediately after the WFP Executive Director circular was issued. Therefore, the useful explanatory notes and guidance on actions to be taken and how principles should be applied did not inform the circular.

“We are still debating with Legal on how we can frame this . . . whether a ‘victim’ is only our victim if [they] are a beneficiary [which would not necessarily address matters of exploitation related to transactional sex for example].”⁵⁷

Figure 4: WFP policy hierarchy⁵⁸



130. The 2023 Executive Director circular re-emphasizes the importance of working with partners, including the obligations on WFP in relation to cooperating partners, vendors and other contracting entities, and the responsibility of WFP to support partners in delivering PSEA commitments. It also provides a clearer explanation,

⁵³ The UNHCR 2023-2025 strategy and action plans demonstrate how peer organizations are starting to clarify operational responsibilities. [tackling-sexual-exploitation-abuse-sexual-harassment-2023-2025-strategy-and-action-plan.pdf \(unhcr.org\)](https://www.unhcr.org/press/2023/06/2023-2025-strategy-and-action-plan.pdf).

⁵⁴ Zero tolerance is most commonly understood by internal interviewees as the organization responding decisively to any complaint of SEA and applying disciplinary sanctions should an investigation find that an act of SEA had in fact occurred. The vast majority of those interviewed offered no additional definition for zero tolerance for inaction.

⁵⁵ The 2021 Ethics Office Strategy on Prevention and Protection from Sexual Exploitation and Abuse (2021–2023), which was approved in June 2021 included in their vision that “if an act of SEA is committed or attempted WFP will respond swiftly with a VCA”. The strategy also commits to “apply a victim-centred lens to our activities...displaying care and empathy to those we serve”. However, “VCA” is not included in the “key definitions” section of the Ethics Office strategy.

⁵⁶ IASC. 2023 Definition & Principles of a Victim/Survivor Centred Approach.

⁵⁷ Key informant interview (KII)

⁵⁸ Figure 4 was developed by the evaluation team. Please note that according to the Update of the WFP Policy on Policy Formulation (2022), thematic and technical strategies are under the responsibility of management, while strategies are guided by staff in a specific unit or technical area. They are not systematically submitted to the Executive Director for approval.

using more direct language than previous Executive Director circulars, of the forms of behaviour that are prohibited, including: sexual activity with a child, regardless of whether the staff member was aware of the age of the child; exchange of money, goods, or services for sex; exchange of assistance for sex; and 'improper' relationships between WFP staff and beneficiaries. Some of this revised language reflects the language in updated IASC documents such as the IASC Six Core Principles, relating to sexual exploitation and abuse, which were themselves revised in 2019.

131. Ethics Office staff, who led the development of the 2023 Executive Director circular, describe the process of several years of intense consultation and socialization of commitment to PSEA required, to lay the groundwork and to prepare to update the 2014 Executive Director circular for the changes laid out in the 2023 Executive Director circular on PSEA.⁵⁹ The evaluation team were able to identify areas of compromise that remain. For example, although the prohibition of sexual activity with children is updated and there is now a clear statement that a child is a person under the age of 18,⁶⁰ the 2023 circular notes (in Footnote 9): "The exception to this principle continues to apply only to WFP employees who, at the time of entry into force of this Circular, are married to a child and are engaged by WFP under any type of contract, for the duration of that contract." This exception was included in the 2003 Secretary-General's bulletin. However, the exception had been made obsolete by the January 2023 issuance of Secretary-General's bulletin ST/SGB/2023/1⁶¹ revision of the staff rules, which was issued following the 2022 A/77/282: Issue of child, early and forced marriage.⁶² With the revision of the staff rules, paragraph 4.4 of the Secretary-General's bulletin becomes obsolete. While it is understood that the process of preparing an Executive Director circular is necessarily proscribed and lengthy, and that other United Nations agencies may not have amended their own PSEA policy frameworks, it is unfortunate that this could not have been updated in the 2023 Executive Director circular.

132. The 2023 circular provides additional detail on long-established roles, responsibilities and obligations of WFP employees,⁶³ including on prevention of sexual exploitation and abuse. These responsibilities are allocated to WFP staff, WFP office and divisional directors, focal points (effectively the deputy country directors, the Ethics Office, OIGI, staff relations and WFP regional and country advisers). The need for a budget and for appropriate skills of focal points is stressed, although it is also mentioned that this focal point role will not be a full-time role. It does not indicate how levels of sexual exploitation and abuse risk are to be measured and whether resources should be matched to assessed or pre-existing risk. This is not in line with United Nations-wide practice where PSEA capacity is enhanced in higher risk contexts. There is no reference to expectations that PSEA measures should be adapted when new emergencies or significant contextual change occurs. There is no recommendation about, or any reference to, any central resource to support adaptation as referred to as good practice in the annual United Nations Secretary-General reports on PSEA.⁶⁴ The 2023 Executive Director circular does not provide signposting to a WFP PSEA system or guidance on how to customize the PSEA approach. It should be noted that the 2014 Executive Director circular stated that a purpose of the update was indeed to strengthen the WFP PSEA framework without providing detail on what this entailed.

133. Since the 2005 Executive Director circular, it has been established that the Executive Director held country directors responsible for a range of PSEA measures, including: ensuring that all staff received the Secretary-General's bulletin and were aware of their responsibilities under it; appointing PSEA focal points; and ensuring that cooperating partners are informed of standards and responsibilities. The 2013 Executive Director circular⁶⁵ provided country directors (and deputy country directors as the PSEA focal points) with more detail on what is expected of them. The 2013 Executive Director circular contains an articulation of the responsibility to analyse

⁵⁹ KII.

⁶⁰ The prohibition of sex with children is not a new prohibition as it has existed since 2003 as part of the SGB section 4.4, which also states that this is regardless of the age of majority or age of consent locally.

⁶¹ SGGB 2003/13 Para: 4.4 The Head of Department, Office or Mission shall not apply the standard prescribed in section 3.2 (b), where a staff member is legally married to someone under the age of 18 but over the age of majority or consent in their country of citizenship.

⁶² [ST/SGB/2023/1 \(undocs.org\)](#).

⁶³ WFP employees are defined as per footnote 23 in OED2023/011 as: "any person employed by WFP regardless of contract type, including but not limited to: international professional staff members, general service staff members, locally recruited staff members, short-term personnel, consultants, persons recruited on Special Service Agreements and Service Contracts, casual labourers, volunteers, interns and United Nations volunteers."

⁶⁴ N2304815.Secretary General. 2023. Special measures for protection from sexual exploitation and abuse. Report of the Secretary-General; paragraph 9.

⁶⁵ WFP. 2013. OED2013/025.

sexual exploitation and abuse risk and mitigation measures, the responsibility to ensure that PSEA checks were conducted during monitoring, and – crucially – the responsibility to inform all affected communities about United Nations staff and partners’ obligations under the Secretary-General’s bulletin, including how to report.⁶⁶ This 2013 update followed upon the issuance of the original 2012 IASC MOS-PSEA⁶⁷ – which may have prompted the update.

134. In common with previous circulars, the 2023 Executive Director circular places a strong and detailed emphasis on the responsibility to report and on the obligations of WFP to investigate sexual exploitation and abuse complaints. This has been a consistent message since 2004 and remains clearly articulated.

135. **Finding 2: WFP differs from some other United Nations agencies in its separation of policy and articulation of responsibility regarding sexual exploitation and abuse and other types of sexual misconduct. Separation of dialogue on sexual exploitation and abuse and sexual harassment, and the omission of discussions on the inherent power imbalances that enable both, may contribute to WFP managers stating that they are not clear about how to fulfil their role, as described in the 2023 Executive Director circular, in “enabling the environment for delivery of effective PSEA.”**

136. The 2023 circular does not discuss the inherent power imbalances that enable sexual exploitation and abuse, and indeed broader sexual misconduct. (This is a key component of good practice according to the expectations outlined in the Secretary-General’s special measures reporting.)⁶⁸ There is no vehicle for substantive leadership-led discussion of the root contextual drivers and vulnerabilities that individuals experience, and that may increase their vulnerability to sexual exploitation and abuse.

137. There have been noteworthy efforts from the Ethics Office and the Human Resources Division to raise awareness of employees of these commonalities through the development of the “Speak Up” sexual misconduct training, however, this has not been reflected at a broader organizational or policy level.

138. Briefings provided to the evaluation team confirmed that sexual exploitation and abuse and sexual harassment would continue to be addressed separately and that there was no intention to combine the Executive Director circular on PSEA (OED2023/011) and that on abusive conduct (OED2022/004) into a comprehensive sexual misconduct policy that addresses prohibited activity based on the nature of underlying cultural norms. This is a different approach from peer organizations, which, at a policy level, address sexual misconduct more broadly (see Box 2). According to comparator organizations such as UNHCR, addressing the underlying causes and increasing understanding of the power that is conferred by being involved in the delivery of assistance is critical for improved understanding of the need for mainstreamed prevention and response to sexual misconduct.

Box 2. UNHCR efforts to address the underlying causes of sexual exploitation and abuse through organizational cultural change.

In 2019 the UNHCR High Commissioner became the IASC Protection from Sexual Exploitation and Abuse and Sexual Harassment (PSEAH) Champion and UNHCR announced that a focus on cultural change would be a priority for his Championship. Leveraging the leadership role, UNHCR sought to increase awareness and understanding that one of the underlying causes of sexual misconduct is a misuse of the power and privilege conferred upon humanitarian aid workers and partners. The UNHCR view, supported by the IASC Principles and endorsed in the conclusions and recommendations to the 2021 IASC review, is that change to individual behaviour is significantly influenced by organizational culture. UNHCR sought to demonstrate that part of securing such cultural change must be visible and repeated engagement by leaders, over time, through authentic and informed engagement. The High Commissioner maintained that “IASC Principals have a responsibility to raise the issue of sexual misconduct at every opportune moment, especially when travelling on mission and engaging with colleagues.”⁶⁹ All IASC Principals participated in a series of learning events and committed to addressing this within their own agencies.

Internally UNHCR has embedded this approach within three consecutive strategies and action plans since 2019 and across operational guidance. The organization also indicates that they see addressing such underlying

⁶⁶ WFP. 2013. OED2013/025.

⁶⁷ WFP. 2013. OED2013/025.

⁶⁸ Secretary-General. 2023. Special measures for protection from sexual exploitation and abuse. Report of the Secretary-General A/77/748

⁶⁹ IASC. 2019. UN High Commissioner for Refugees, 2019-2020 Priorities and Initiatives as IASC Champion on Protection from SEA and SH.

causes as necessary for delivering on victim-centred approach commitments. “We realized that changing our working culture is critical to build victims’ trust and help overcome the enormous barriers faced in speaking up and receiving the support and assistance they need.”⁷⁰

139. Staff, with institutional memory of the 2014 circular, reported that they saw the 2023 circular as a significant modernizing step forward. Alongside this, they believe that hesitation from leadership on how to engage and lead dialogue on organizational cultural norms may hold WFP back in delivering on its PSEA commitments and believe that this requires additional policy engagement before mainstreaming will be effective. This is not only an issue of concern for WFP but an issue that is a priority across the sector.⁷¹ Cultural change requires time. For WFP, it is unfortunate that the initial foundation has not yet been laid in the form of a clear and coherent policy statement.

140. Country directors have been expected to establish the proper “environment” for delivery of PSEA since the 2005 Executive Director circular on PSEA. Most country directors interviewed and all regional interviewees report that they would like more discussion on what this means in practice. They would also like reassurance that, as managers, they will not be penalized for making the changes required, especially if raising awareness and trust results in additional sexual exploitation and abuse complaints. As one country director stated, a focus on addressing cultural norms and PSEA alongside an increase in staff confidence in reporting or expressing concerns may not be valued by the organization.

“Are UN values only from nine to five, five days a week? We are instilling a very sort of different cultural value [if we deliver on PSEA]. This is why we struggle. I don’t see it as a mark against us when we have a lot of reports but [in WFP culture] if we [managers/country directors] receive [SEA] reports, we feel penalized.”⁷²

141. **Finding 3. In contrast to other agencies’ policies on PSEA, the Executive Director circular is not accompanied by an organizational strategy or implementation plan. It is unclear how management derive confidence that PSEA commitments are being met.**

142. There are no plans to accompany the 2023 circular with a stand-alone policy, a strategy, or an implementation plan. In comparison, UNICEF demonstrates a comprehensive PSEA-focused theory of change – focused on organizational change – as well as an action plan with a log frame updated for 2023 (see Box 3). The UNICEF plan is comprehensive with clear indicators of progress. The sequence of activities UNICEF country offices are expected to comply with, and what capacity was available to support this work, is evident in UNICEF documentation and is clear to staff interviewed at UNICEF headquarters and at the country level. Without a similar implementation plan, WFP senior leadership do not have a framework to build confidence that the commitments made in the 2023 Executive Director circular were being delivered, and if not, which elements of the PSEA ‘system’ required reinforcement. Although country directors are required to include within the annual Executive Director assurance statement that the “PSEA self-assessment checklist” has been completed, very few country directors were able to speak about this process and it is unclear how the self-assessments are analysed or used at country, regional, or headquarters levels.

143. The Ethics Office has developed a 2021–2023 WFP Protection Against Sexual Exploitation and Abuse Strategy, which was endorsed by the Executive Board. This is not an organization-wide strategy but is for the Ethics Office to articulate and to support the delivery of their vision and strategic priorities. This strategy is in line with international standards and commitments although it does not encompass all international standards and commitments. The next Ethics Office strategy for 2024–2026 will encompass PSEA and will be accompanied by a stand-alone PSEA strategy to guide the activities of the Ethics Office.

⁷⁰ Key informant interview

⁷¹ SCHR (2023) Evolution of collective IASC member culture on PSEAH.

⁷² KII.

Box 3. UNICEF PSEAH strategy, theory of change and action plan development

In 2018, an independent review of the UNICEF response to PSEA and an independent review of how the organization has dealt with claims of sexual harassment in the workplace were completed. Both reviews delivered a comprehensive set of recommendations – including the need to develop a PSEAH strategy.

Under the banner of Child Protection in Humanitarian Action, and in line with the Core Commitments for Children, UNICEF proceeded to develop the policy across 2019–2021. These consultative efforts culminated in a comprehensive theory of change that was finalized in April 2022. The underpinning rationale (quote below) behind the UNICEF theory of change was aligned with this evaluation’s WFP PSEA logic model:

“If all women, children, communities, and humanitarian personnel have access to high-quality reporting mechanisms, and they receive high-quality prevention and response services, and they are engaged in the development of strategies and decision-making processes, and if cases of SEA are investigated and processed in accordance to international standards and through the delivery of quality support, then it will be possible to increasingly guarantee that they are safe from SEA, and that they are respected and empowered.”

The theory of change narrative proceeds to explain all components of UNICEF organizational apparatus for PSEA, including in-depth risks and assumptions about the delivery chain. This theory of change focused primarily on organizational change. Subsequently, an action plan was developed in late 2022 focused on the programme results level. Following this, an Entity Level Action Plan to Prevent and Respond to Sexual Exploitation and Abuse was developed in 2023. This plan included five outcomes with associated indicators, targets and actions. The five outcomes related to: policy and entity oversight; victim’s right to assistance; investigations; accountability and training; and risk management and partner assessment.

2.1.2. EQ1B. To what extent do WFP strategic and policy frameworks provide internal coherence with WFP PSEA commitments?

144. **Finding 4: The WFP Strategic Plan (2022-2025) references PSEA integration into programming for the first time but provides no direction on how to deliver against the 2014 Executive Director’s PSEA circular. During the period considered by the evaluation, policies increasingly reference sexual exploitation and abuse, but little significance is placed on delivery of PSEA commitments.**

145. The evaluation spans two WFP strategic plans (2017–2021 and 2022–2025). The Strategic Plan (2017–2021)⁷³ did not refer to PSEA directly, although annex II did contain an articulation of the WFP Code of Conduct, which included a commitment to “acting impartially and fairly without any acts of sexual exploitation and abuse” as well as reference to a workplace “free from harassment, sexual harassment, sexual violence and/or abuse of authority”.

146. The WFP Strategic Plan (2022–2025)⁷⁴ makes one reference to PSEA under cross-cutting issues, explaining that it is expected that “measures for protection from sexual exploitation and abuse will also be integrated into operations and programming”. There is also a reference to ensuring safety and dignity within the guiding principles section, although there is no direct connection made between PSEA and the humanitarian principles or do no harm.

147. Global and country-level strategic planning documents do not articulate what the WFP approach to meeting PSEA commitments should be, although it is routinely suggested that PSEA is a “cross-cutting issue”. WFP has not clearly explained if this is a stand-alone cross-cutting issue or subsumed under protection or accountability to affected populations (AAP) as a cross-cutting issue. While there is no standalone-specific PSEA guidance note available, the PRO-P Guidance Note for CSP Development on Integrating People-Centred Approaches in the CSP does include reference to PSEA.⁷⁵

⁷³ WFP. 2017. Strategic Plan (2017–2021).

⁷⁴ WFP. 2022. Strategic Plan (2022–2025).

⁷⁵ WFP. 2022. Integrating People-Centred Approaches in the CSP: PRO-P Guidance Note for CSP Development.

148. The evaluation team has considered the 34 delivery-orientated suite of policies relating to the strategic plan to understand how operational commitments and delivery of PSEA are expressed. Of these, 30 were put in place after the Secretary-General's bulletin, and 11 were added since 2018. The table of analysis by policy can be found in annex 12. The evaluation team found that 25 of these policies do not reference sexual exploitation and abuse risk or PSEA in any way, and that 7 out of 11 policies put in place during the period under evaluation make mention of PSEA. The more recent policies that do not reference sexual exploitation and abuse risk or PSEA are the Local and Regional Food Procurement Policy (2019), the Revised Fraud and Corruption Policy (2021), and the Evaluation Policy (2022). Many of the policies that do reference PSEA either simply cite the commitment to the Secretary-General's bulletin in the Humanitarian Principles Policy (2004) or cite the Executive Director circulars on PSEA and on abuse of authority in the Environment Policy (2017). Notably, PSEA is mentioned as a commitment in the Gender Policy (2022), but no detail is provided to give background on how different demographic axes might affect PSEA outcomes for women and girls in different circumstances – such as nuanced risk and vulnerability across ages, ethnicities, race, or socioeconomic status (including households headed by women and girls). The 2020 Protection and Accountability Policy refers to sexual exploitation and abuse within the cross-departmental policy coherence section but provides no additional analysis or direction, and the Workforce Management: People Policy makes several references to the clear commitment by WFP to zero tolerance. Most recently the Aviation Policy (2023) refers to upholding a zero tolerance policy in relation to sexual exploitation and abuse, while the Cash Policy (2023) references the Secretary-General's bulletin and states that WFP “takes measures to protect people from sexual exploitation and abuse across cash operations and WFP's cash assurance framework”. While not all operational and delivery orientated policies would be expected to provide significant analysis or detail about the implications of PSEA obligations, it would be reasonable to expect more alignment from recent policies related to key delivery modalities, or accountability. The evaluation team noted that sexual exploitation and abuse and PSEA are starting to feature or be referenced in strategies from 2022 onwards with the 2023 Urban Strategy making the critical point that there is a need to align PSEA to context analysis.

149. **Finding 5: WFP is increasingly mentioning PSEA commitments in country strategic plans, but there are few examples where CSPs articulate expectations on PSEA actions or the change in practice that is expected.**

150. The 2016 Policy on Country Strategic Plans ⁷⁶ provides guidance on country strategic plans but does not reference responsibilities on PSEA or how to integrate PSEA measures into programming. It does however require gender equity and women's empowerment to be incorporated, alongside other cross-cutting issues, into CSPs. The evaluation team conducted a review of the 75 current CSPs. Of these, currently 41 country strategic plans reference PSEA by mentioning the obligation (the majority), citing the commitment to participation in the inter-agency network, listing it together with other protection commitments, or in a cross-reference to do no harm (in Jordan). Most –though potentially due to being constrained by word limits –add no more information, risk analysis, or details on commitments. Of the CSPs, 20 include corporate results framework (CRF) indicator 2.5: “the number of children and adults who have access to a safe and accessible channel to report SEA”, while 12 CSPs state that they will report against corporate results framework indicator 2.1: “Percentage of beneficiaries reporting they were provided with accessible information about WFP programmes including PSEA”. The CSPs do not detail how the country offices will use this data or the extent to which they will be able to use it to target PSEA awareness activity or to monitor community feedback mechanisms. As indicators 2.5 and 2.1 only came into effect in 2023, the integration in the 20 and the 12 CSPs respectively mentioned above is not reflective of the overall current CSPs currently operational.

151. A few CSPs provide more detail about PSEA commitments. For example, the Kenya CSP (2023-2027) provides a paragraph explaining their PSEA architecture, the Nepal CSP (2019-2023) refers to the ability of the community feedback mechanism to receive PSEA complaints “if” they occur (emphasis within the CSP), the CSPs for Haiti (2024-2028) and Malawi (2024-2028) reinforce the need for training and for community sensitization, and the Cameroon CSP (2022-2026) talks about drawing on past experience to learn lessons aligning the risks of food diversion and manipulation of beneficiary lists with that of sexual exploitation and abuse. The Cameroon country

⁷⁶ WFP. 2016. Executive Board Policy on Country Strategic Plans.

office also demonstrates a proactive approach for awareness-raising among United Nations staff more widely by conducting PSEA sessions on UNHAS flights.⁷⁷ As a senior staff member in a regional bureau remarked:

“It may be fair to say that positive examples of operational PSEA are the exception rather than the rule still in WFP. It has only been in the last two years, after the protection and accountability policy, that protection investments at regional bureaux and country offices have happened. PSEA should not be a stand-alone workstream for us. It is about making sure that all aspects of all workstreams have the prevention of SEA front and centre.”⁷⁸

2.2. EQ2. How do WFP systems and structures facilitate action and learning on PSEA?

152. **Monitoring structures primarily focus on quantitative data analysis at headquarters, while the collection of data for PSEA action plans at regional bureau and country office levels is limited. Despite headquarters’ development of PSEA guidance, manuals and tools, a formal PSEA system is lacking. Regional bureaux and country offices lack capacity for contextualization and seek support. While structures for functional community feedback mechanisms are clear, it’s uncertain how country offices determine appropriate mechanisms for sexual exploitation and abuse complaints. PSEA-related risk assessments receive limited support and process. Although there’s been growth in headquarters’ PSEA resource base and focal point network, human resource constraints persist. Budget allocations lack clarity and protection, hindering effective PSEA action and learning. Clarification and communication regarding the commitment to a victim-centred approach are needed.**

Box 4. Definitions of terms for EQ2

Structure involves organizing parts or actions systematically to facilitate PSEA action and learning, serving as the foundation to fulfill commitments. It encompasses organizational architecture, including key offices, personnel and focal point networks.

Processes entail a series of steps and workflows designed to achieve specific tasks or objectives within WFP and its partners, such as updating PSEA action plans or sharing lessons.

Guidance and manuals offer advice on building structures or conducting activities, while tools facilitate practical actions, ranging from software applications to templates.

A system encompasses a broader array of structures, processes, guidance, manuals and tools interacting to facilitate PSEA action and learning.

2.2.1. EQ2A. How effective are structures and processes for enabling the implementation of WFP PSEA commitments?

153. **Finding 6: The extent of the changes required to implement the PSEA commitments, as outlined in the 2023 Executive Director circular, have not yet been uniformly communicated across the organization.**

154. The 2023 Executive Director circular on PSEA was shared with all staff by email. Staff in several contexts reported that this was supported by country directors, including in emails to country office staff indicating that PSEA is a priority. Awareness-raising efforts also included an organization-wide campaign conducted by the Ethics Office, which included regional multilingual webinars organized for PSEA focal points. In addition, the recent (October 2023) ‘Executive Director Circular Explainer’ note – which was accompanied by a webinar – was a good initiative by the Ethics Office and sought to explain new commitments and obligations, although its emphasis was on personal responsibilities rather than how staff performed their roles. Notwithstanding these diverse

⁷⁷ WFP. 2020. Protection from Sexual Exploitation and Abuse – Year in Review.

⁷⁸ KII.

communications efforts, the evaluation team found many examples where staff members mentioned that they were unaware of the 2023 Executive Director circular.

155. **Finding 7: WFP staff are aware of PSEA obligations in relation to their conduct but less clear regarding how PSEA obligations should influence how they do their jobs. There is no shared consensus on what is required for effective management and oversight of PSEA.**

156. The absence of a plan of action to support the realization of the commitments in the 2014 Executive Director circular means that there has not been sufficient articulation of the structures and processes that are expected to be in place at headquarters, regional bureaux, or country office levels. As of 2023, those PSEA commitments have substantially increased; however, staff interviewed were almost entirely unable to explain what constitutes an effective PSEA structure or an accompanying set of processes that have clear lines of accountability. The degree to which staff interviewed understood their responsibilities for PSEA was found to be highly reliant upon the proactive and confident engagement of country office management and staff – as has been found by evaluations on cross-cutting themes elsewhere.⁷⁹

“What is missing is an accountability framework at all steps and all levels. You can see, even when we trained the CDs, there are so many questions. We are supposed to have focal points at senior management level – these sadly get delegated. There needs to be management-level accountability.”⁸⁰

157. The evaluation team was told repeatedly by managers at the country office level that they believe they were already meeting PSEA obligations. Prompted for more detail these were consistently defined as: clauses in staff contracts; staff completing the mandatory e-learning on PSEA; inclusion of clauses in cooperating partner contracts and field-level agreements;⁸¹ and awareness-raising. When pressed they also noted inclusion of PSEA in cross-cutting training for partners, and the inclusion of PSEA within risk registers. Despite this, many country directors, deputy country directors, heads of programmes, PSEA alternates and accountability to affected populations staff acknowledged that they themselves did not have the knowledge to determine if the right actions for PSEA were being prioritized.⁸² This lack of shared understanding and ability to align and sequence PSEA actions reduces the potential for WFP to deliver effective structures and processes that enable the implementation of its PSEA commitments.

158. **Finding 8: WFP has established structures and processes to collect PSEA-related monitoring data that support broad quantitative analysis of PSEA results. However, the monitoring structures and processes are oriented towards headquarters for corporate monitoring and overlook the wider PSEA system at regional bureau and country office levels.**

Table 1. Summary of WFP PSEA reporting architecture

	Contents	Reporting tool	Data storage/data analysis
1. The WFP corporate reporting system	Cross-cutting PSEA indicators KPI PSEA indicators	APR (global and country)	COMET
2. WFP PSEA CFM	Data on CE and CFMs	CE and CFM survey APR (global and country)	CE and CFM survey
3. SEA allegations reporting system	Data on SEA allegations	Report of the Inspector General/UN i-Tracker	Internal reporting channels

⁷⁹ WFP Evaluation of the Gender Policy (2015-2020), May 2020, Evaluation of WFP Policies on Humanitarian Principles and Access in Humanitarian Contexts, May 2018, Evaluation of WFP’s 2009 Gender Policy Evaluation, January 2014.

⁸⁰ KII.

⁸¹ WFP. 2022. Field-level agreement template.

⁸² 5 KIIs.

159. The current PSEA-related reporting architecture includes three reporting systems,⁸³ (see Table 1).⁸⁴ These are: (i) the annual performance report (APR), used to present results from cross-cutting indicators and key performance indicators; (ii) the WFP PSEA activities, focused on community feedback mechanisms, accountability to affected people (including community engagement and information provision); and (iii) sexual exploitation and abuse allegations reporting system. These three components provide WFP with PSEA data sets that are then aggregated and reported utilizing different online databases by different divisions.

160. PSEA-related limitations of the annual performance report include the fact that not all PSEA-related indicators are reported through it.⁸⁵ Further, annual performance reports do not specify the number of countries that have systematically reported on PSEA; only those with valid data are included. It therefore becomes challenging to track progress and, for example, draw trends by region or type of WFP intervention, including emergency response. Annual performance reports do not present results against the actual PSEA indicators available within the corporate system but utilize a performance rating generated from outcome performance based on programmatic baselines and targets established by countries.⁸⁶

161. The corporate results framework includes cross-cutting indicators as organization-wide core indicators. It states that “in classifying cross-cutting indicators as corporate core indicators, the corporate results framework for 2022–2025 is designed to support the mainstreaming of approaches that maximize programme quality, effectiveness and sustainability while providing a much stronger basis for annual performance reporting against programmes and against specific policy objectives presented in corporate policy documents”.⁸⁷ The corporate results framework includes PSEA-related indicators under the first category of cross-cutting indicators, protection and accountability to affected populations. It also includes seven PSEA-oriented management results, with related key performance indicators, to support performance management and accountability (see Box 5).

Box 5. Corporate results framework indicators, management results and key performance indicators related to PSEA.

There are three corporate results framework indicators specifically referring to PSEA:

1. Percentage of beneficiaries reporting they were provided with accessible information about WFP programmes, including PSEA
2. Number of children and adults who have access to a safe and accessible channel to report sexual exploitation and abuse by humanitarian, development, protection and/or other personnel who provide assistance to affected populations (IOM, OHCHR, UNDP, UNDPO, UNFPA, UNHCR, UNICEF, UN-Women, UNOCHA)^{**88}
3. Percentage of WFP cooperating partners registered in the UN Partner Portal that have been assessed using the UN Implementing Partner PSEA Capacity Assessment.^{**}

Additionally, the corporate results framework includes seven management results and related key performance indicators to support performance management and accountability. There are four key performance indicators related to PSEA that WFP includes under Management Result No.2: People Management:

⁸³ These components have been observed and categorized by the evaluation team; there are no references to this categorization in any internal WFP document. Classification of the three components has been done to facilitate the presentation of SE findings.

⁸⁴ Analysis of how well these reporting systems provide WFP with management information for determining the effectiveness of PSEA measures can be found at EQ4.

⁸⁵ There are two cross-cutting indicators included in the CRF but never reported against in any of the APRs consulted: “C.1.3 – Proportion of assisted people who do not experience safety problems traveling to, from and/or at WFP programme site” and “C.2.1 – Proportion of targeted people accessing assistance without protection challenges”.

⁸⁶ The ‘performance rating’ is set based on the performance assessment, which calculates achievement of countries, comparing the actual change observed to the expected change observed (Annual Performance Report for 2021 Annex II-C).

⁸⁷ 44. WFP/EB.1/2022/4-A/Rev.1.

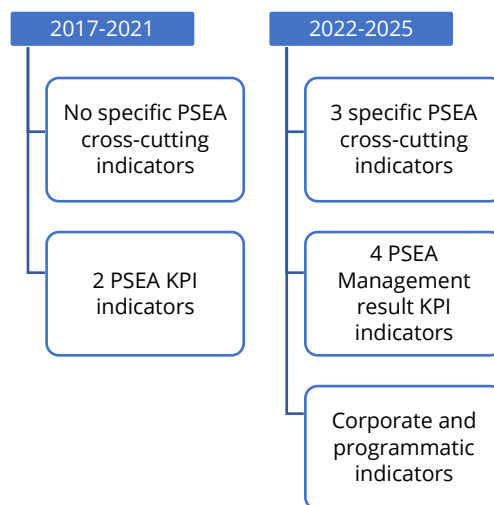
⁸⁸ For bullet-points marked with ‘**’ in box 5 please see paragraph 95 for reference. Please also note: IOM – International Organization for Migration, OHCHR – Office of the United Nations High Commission for Human Rights, UNDP – United Nations Development Programme, UNDPO – United Nations Department of Peacekeeping Operations, UNFPA – United Nations Population Fund, UNOCH – United Nations Office for the Coordination of Humanitarian Affairs.

- percentage of employees completing mandatory training on both protection from sexual exploitation and abuse (PSEA) and preventing and responding to abusive conduct at WFP (harassment, sexual harassment, abuse of authority and discrimination);**
- percentage of country offices with designated PSEA focal points who have successfully completed the ETO PSEA WeLearn Course for focal points on prevention and response to SEA;**
- percentage of offices that have implemented corporate prevention of abusive conduct (harassment, sexual harassment, abuse of authority and discrimination) and outreach tools aimed at employees; and
- percentage of country offices that have implemented corporate sexual exploitation and abuse prevention and outreach tools aimed at employees, cooperating partners and frontline workers.

On top of these indicators specifically referring to PSEA, there are other indicators under the protection and accountability to affected people area that relate to PSEA priorities such as “percentage of country offices with a functioning community feedback mechanism”. (for the full list, see Annex 14).

162. In comparison with the former 2017–2021 corporate results framework, the 2022–2025 framework includes new PSEA-specific programme indicators and management key performance indicators that should increase visibility to key areas of WFP commitments on PSEA. These relate to the strengthening of corporate capacities and structures and to programming and building partnership accountability (see Figure 5 for summary and annex 14 for detail). As these were only launched in 2023 there is no performance data yet available.

Figure 5. Summary of key changes in corporate results frameworks related to PSEA compared to 2017–2021 indicators.



163. Annex 14 provides a list of a comprehensive range of indicators from the WFP corporate results framework that could be relevant to PSEA outputs and outcomes, but most of them are broader than PSEA alone. For example, CC 2.4 “Percentage of country offices that have a community engagement action plan” provides an indication that community interests have been appropriately considered in programming, but the indicator does not look specifically at the degree to which PSEA is adequately addressed within community engagement plans. The annual Executive Director assurance exercise includes a checklist on PSEA⁸⁹ but there has not yet been a compilation and analysis of the responses from the field.⁹⁰

164. Also, not all of WFP programmatic and operational commitments have been reflected by this new set of indicators. In the 2021–2023 strategy intended to guide its work, the Ethics Office set out important strategic

⁸⁹ WFP.2023. Guidance Note on the 2023 Executive Director Assurance Exercise, pg. 2.

⁹⁰ KII.

objectives⁹¹ that are distinct from corporate indicators. These were: (3) expand PSEA mainstreaming across WFP; (4) use data to identify opportunities for mitigation measures and preventive actions across WFP; and (5) maintain and enhance the role of WFP as key stakeholder at the United Nations. Compared to IASC PSEA core indicators,⁹² and in comparison to sister agencies, WFP PSEA cross-cutting indicators miss key elements. For example, UNICEF and UNHCR have indicators for internal reporting and referral systems, access to quality victim-centred assistance, integration of the victim-centred approach through protocols and internal reporting guidelines, identification of risks and development of mitigation plans and partners' enhanced capacities.⁹³

165. The three newly introduced corporate results framework indicators for 2022–2025 (marked with ** in Box 5 above) align with the set of 18 PSEA core indicators.⁹⁴ These are for the country-level inter-agency PSEA networks to report against and are intended to become an important tool in monitoring overall humanitarian system progress in PSEA.⁹⁵ Non-humanitarian response plan countries also complete reports. WFP country offices where inter-agency structures report against the IASC core indicators will find that their own set of indicators are only partially aligned, potentially reducing their utility and leading to confusion that could impede prioritization of PSEA activity.

166. Beyond these structures, WFP headquarters has not provided country offices with a PSEA output, process, or outcome monitoring structure. As noted above, few informants were able to discuss their understanding of an overall PSEA system. These informants expressed their frustration regarding implementing PSEA activities without the ability to link activities and outputs to change that can then be documented to contribute to overarching WFP PSEA system development.

"Is it important to identify and be clear about what we are looking for. Strengthen prevention? The action after the investigation? We should be clearer about the objectives and indicators of PSEA. Consider what we are looking for and how we are going to work on it."⁹⁶

Box 6. UNHCR monitoring practice.

UNHCR has put in place mechanisms to track at both field and headquarters levels the implementation status of PSEA policies. "Core" and "good practice" indicators, organizational markers, and guidance have been developed to measure progress on addressing sexual exploitation and abuse and sexual harassment against the UNHCR global indicator framework. This allows implementation to be tracked through results-based monitoring.

2.2.2. EQ2B. How do WFP guidance, manuals and tools, including for risk, support WFP and partners in undertaking PSEA?

167. **Finding 9: PSEA-specific guidance, manuals and tools have been developed in headquarters to complement inter-agency guidance, manuals and tools. Usage is not routine and managers and staff in regional bureaux and country offices consistently request greater clarity on what constitutes the PSEA 'system' and how tools should be contextualized.**

168. PSEA-related resources, such as action plan templates, standard operating procedures (SOPs), and guidance manuals, have been created by the Ethics Office and the Emergencies and Transitions Service. These materials are distributed to PSEA focal points and others, including protection and accountability focal points. They cover areas like e-learning, community feedback mechanism referrals, community engagement, capacity assessment, and gender and gender-based violence toolkits.⁹⁷ There are also a range of awareness-raising materials – such as posters – to publicize the hotline and other community feedback mechanisms. Focal points

⁹¹ The Ethics Office Strategy on Prevention and Protection from Sexual exploitation and Abuse (PSEA) 2021–2023 includes five strategic objectives: (i) capacitate WFP employees and partners with knowledge and skills; (ii) enhance policies/procedures to ensure accountability and a VCA; (iii) expand PSEA mainstreaming across WFP; (iv) use data to identify opportunities for mitigation measures and preventative actions across WFP; and (v) maintain and enhance the role of WFP as key stakeholder at the United Nations.

⁹² IASC. PSEA CORE Indicators. [Guidance Note](#).

⁹³ UNICEF. 2022. [CPHA – PSEA ToC Monitoring Framework](#); UNHCR. 2023. [Coordination on Protection from Sexual Exploitation and Abuse \(PSEA\)](#).

⁹⁴ IASC. PSEA CORE Indicators [Guidance Note](#).

⁹⁵ IASC. 2022. [Global report](#).

⁹⁶ KII.

⁹⁷ Via email correspondence with Ethics Office (December 2023): 'PSEA at the Frontline', 'Speak Up! Be the difference', 'Addressing Sexual Misconduct at WFP: Say no to sexual misconduct' training package, 'Ethics Risk Mapping – guidance with indicators.'

also have access to inter-agency support, which includes the IASC Learning Package on Protection from Sexual Misconduct for UN Partner Organizations, the IASC deployment package for PSEA coordinators and generic terms of reference templates for PSEA coordinators, networks and focal points.⁹⁸ Results from the evaluation's survey of focal points (see Annex 9) still point to some dissatisfaction with inter-agency tools and guidance. Only 25 percent of respondents considered guidance from outside of WFP (for example, inter-agency PSEA networks) as adequate, with a strong preference for WFP internal tools and guidance (these were considered 'adequate' by 62 percent of respondents).

169. The WFP PSEA country level action plan may prove a useful initiative and increasing numbers of country offices are adopting it. If used correctly (see Box 7 for a good example) it should support awareness-raising and action on PSEA by prompting consideration of how tools are to be used and connected. For example, of the country offices reviewed, seven have produced dedicated PSEA action plans.⁹⁹ Of these, five referred to inter-agency activities and two referred to WFP-specific PSEA action planning. At the regional bureau level, promising practice was noted in the regional bureau for Southern Africa, which demonstrated a unique cross-cutting regional PSEA action plan. However, many of the action plans have not been adapted to the contextualized needs and risks but simply include all the actions proposed by the template. Sex and age disaggregation is not evident in the action plans, nor is any comprehensive commitment to mainstream or target gender equality and diversity – as outlined in the WFP Gender Policy (2022-2026).

170. In a review of action plans on protection, accountability to affected populations and disability from country offices, there was rarely detailed reference to PSEA. For example, although the Bangladesh country office does not have an internal action plan specific to PSEA, it has produced a disability inclusion plan, a gender and protection workplan, an annual plan of action for protection and accountability to affected populations and several more relevant documents spanning 2018–2023. These documents refer to PSEA activity areas among many other operational commitments, but these references are not integrated with other components.

171. In short, WFP guidance, manuals and tools for PSEA, while available, are not widely known or utilized systematically in all contexts, which makes ensuring effective PSEA more challenging, as well as understanding how effective these instruments are in practice, across delivery modalities, and in different contexts, more difficult.

Box 7. Good practice: WFP South Sudan action plan

The South Sudan country office developed a comprehensive action plan that “emphasizes, coordinates and operationalizes WFP’s zero tolerance commitment and responsibility to facilitate protection from sexual exploitation and abuse (PSEA)” (p.3). This follows the priorities outlined by the Ethics Office strategy and defines five priority areas and the outputs, activities and human resource standards to pursue them. These include policy and procedure, prevention approaches (community awareness and capacity building components), management and coordination (United Nations taskforce, human resource standards, PSEA compliance with partners, and maintenance of the focal point network) and protection and response (complaints systems, investigations, victim assistance and disciplinary actions). However, the fifth element, focusing on the monitoring, learning and reporting area, is not detailed and it is unclear how information and analysis are used to inform management decisions.

172. Stakeholders across country offices, regional bureaux and headquarters emphasize the importance of increased guidance uptake and enhanced knowledge management regarding the five priority areas. They acknowledge the significance of guidance and knowledge-sharing to adapt approaches and communication to match partner portfolios, given WFP reliance on partners for PSEA operationalization. This ensures clarity and support for governments, vendors, academics and cooperating partners, while WFP plays a technical and capacity building role. Despite the launch of WFP standard operating procedures on United Nations implementing partner capacity assessment, concerns persist among country office staff about their technical knowledge to support external partners to deliver on WFP PSEA expectations. Many, including senior management, lack clarity on responsibility within the country office for this role.¹⁰⁰

⁹⁸ United Nations. Preventing sexual exploitation and abuse [tools](#).

⁹⁹ Cameroon, Iraq, Mozambique, Pakistan, South Sudan, Uganda, Zimbabwe.

¹⁰⁰ 2 KIIs.

173. To put guidance and tools into practice, country offices consistently expressed the need for more practical guidance on how to use the tools, more examples of adaptation and further contextualization of materials.¹⁰¹ Moreover, some staff stated that they were not aware as to whether there is flexibility to adapt manuals and tools. For instance, a country office procurement team sought to expand a compliance assessment tool to include categories for reviewing retailers, but felt they were unable to do so.¹⁰² Similar comments came from managers, policy and programme officers, research, assessment and monitoring (RAM), procurement, and supply chain staff:

“We don’t have a policy problem but a problem of implementation - the operationalization of policy commitments. We also don’t have unified technical guidance on PSEA e.g. how to better engage communities at the front-line. We need a handbook, a guide to translating the guidelines into practice. There are technical aspects to PSEA work, and this should be recognized.”¹⁰³

174. Staff occasionally took the opportunity to comment on the “unrealistic” nature of some of the guidance, such as (in the interviewees’ perception) the expectation of no relationships between staff and beneficiaries at the community level¹⁰⁴ with little further clarification on why such principles are unrealistic.¹⁰⁵ There is also a sense that, without an overarching framework or a manual, some staff may not clearly understand why some guidance and tools should be prioritized and how they should be sequenced. There is also a sense that some guidance, manuals and tools feel “alien”.¹⁰⁶ This presents challenges for focal points in advising and supporting managers and programme staff to apply the guidance.

175. **Finding 10: Country offices consider community feedback mechanisms to be the backbone of a PSEA reporting system. They have guidance for establishing “functional” community feedback mechanisms, which is not fully compliant with PSEA expectations on safe, confidential and accessible community feedback mechanisms. Country offices are exposed to risks of not fulfilling PSEA commitments by a reliance on a single mechanism that is often under resourced, and not contextually customized.**

176. WFP has a definition for the functionality¹⁰⁷ of community feedback mechanisms, which is aligned with the definition of “safe and accessible reporting channels for SEA” from both the IASC¹⁰⁸ and UNICEF,¹⁰⁹ although it was missing critical detail until late 2023 when community feedback mechanism guidance was updated. Annex 17 illustrates the additional requirements UNICEF expects for safety and diversity and inclusion accessibility. WFP previously did not stress the same need to have multiple, consecutive reporting channels operational, or provide detail on the design implications of considering diversity, inclusion and access prior to 2023. WFP does not specify that community feedback mechanisms, which exist for receiving all complaints, need to be assessed and adapted for sexual exploitation and abuse suitability. WFP guidance pays less attention to the issue of safety than to the need for community feedback mechanism staff to be trained to receive sexual exploitation and abuse reports (see Annex 17). Elements related to gender awareness and diversity were amplified in updated 2023 community feedback mechanism guidance, however detail regarding concrete steps to address the gender inequalities and intersectional issues that are barriers to accessing community feedback mechanisms is still absent in the guidance.¹¹⁰

177. WFP country offices present community feedback mechanisms as the primary tool to obtain PSEA reports. In fact, staff routinely cite these mechanisms in interviews, together with awareness-raising, as the core of a community-facing PSEA system. However, interviewees were not able to discuss how they knew that community feedback mechanisms or hotlines would be contextually appropriate for receiving sexual exploitation and abuse

¹⁰¹ 14 KIIs.

¹⁰² KII.

¹⁰³ KII.

¹⁰⁴ KII.

¹⁰⁵ It was not part of the purpose of the evaluation to consider whether WFP should maintain PSEA commitments rather how WFP was making progress against PSEA commitments. Therefore, there was no question posed about the realistic nature of the commitments and guidance. It is not possible therefore for the evaluation team to respond to questions about how prevalent such concerns about the guidance may be.

¹⁰⁶ KII.

¹⁰⁷ WFP. Community Feedback Mechanism Standards, Guidance & Tools. Interactive document.

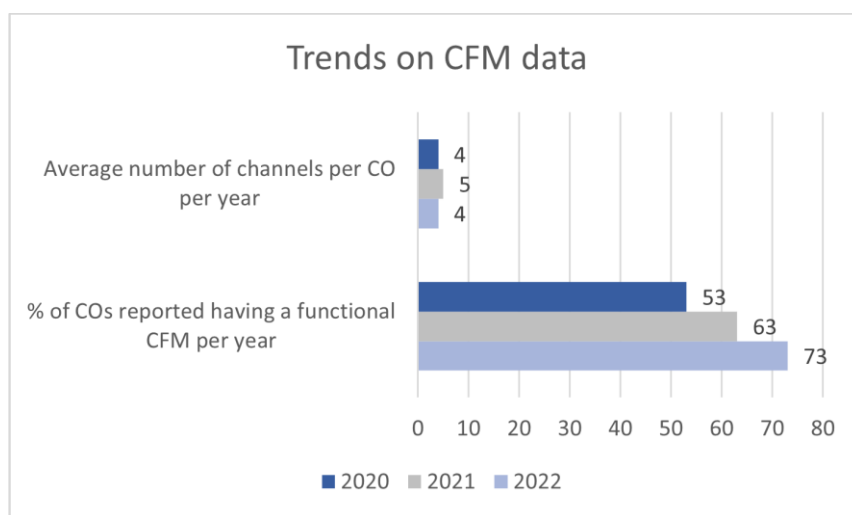
¹⁰⁸ See IASC. PSEA CORE Indicators [Guidance Note](#).

¹⁰⁹ Annex 16.

¹¹⁰ WFP (2024) Community Feedback Mechanism: Guidance, Manuals and Tools.

complaints. The most common type of community feedback mechanism is the hotline, the majority of which, according to the 2020–2022 community engagement and community feedback mechanism survey, WFP directly operates and utilizes in its programmatic work globally (70 percent). The community feedback mechanism survey also shows positive trends in the design and development of functional community feedback mechanisms – which include systems for reporting intake and escalation.¹¹¹ The number of community feedback mechanism structures is steadily growing across country offices since 2018 (see Figure 6 below). WFP monitoring data also show that, as of 2021, 24 percent and 41 percent of country offices had either partial or fully centralized¹¹² community feedback mechanism systems respectively.¹¹³ These numbers increased to 32 percent and 49 percent in 2022. Community engagement action plans, promoted as of 2021, are now also a corporate requirement as of 2023. These have grown to 36 in total (46 percent of 76 assessed country offices).¹¹⁴

Figure 6. Trends on community feedback mechanism data



Source: WFP 2020–2022 community engagement and community feedback mechanism survey.

178. Only 54 percent of country offices in the community engagement and community feedback mechanism survey reported having a fully equipped community feedback mechanism to receive and refer cases of a highly sensitive nature, such as allegations of misconduct, sexual exploitation and abuse or sexual harassment.¹¹⁵ Of this sub-set, 78 percent of country offices (58) reported having standard operating procedures for the handling and referral of sensitive cases. Also, 62 percent of country offices (46) stated that community feedback mechanism staff had been trained to process these types of issues.¹¹⁶ In terms of community engagement, 48 out of 81 country offices reported having a budget for community engagement, while a further 33 country offices stated that they had a budget that was inadequate for this purpose.¹¹⁷

179. WFP analysis reports that some important gaps related to the effectiveness of channels to receive and refer sexual exploitation and abuse cases have been identified.¹¹⁸ These challenges include: the assumption that all community members will be able to access a hotline and the increasing reliance on hotlines limiting the opportunity to complain for those who cannot access them; a significant proportion of countries running the community feedback mechanisms without budgetary allocations, impeding the development of a centralized

¹¹¹ According to the community engagement (CE) and community feedback mechanisms (CFM) 2022 annual survey results: “A country office is considered to have a functional CFM if it meets three out of five criteria: (i) design, (ii) data protection, (iii) resources, (iv) case closure, and (v) validation of programmatic adaptations.”

¹¹² Partial: Feedback is collected and/or managed individually for each communication avenue but reporting is centralized; Centralized: All communication avenues are channelled through the same system.

¹¹³ WFP. 2021–2022. CFM Monitoring data. N=76.

¹¹⁴ Ibid.

¹¹⁵ WFP. 2021–2022. CFM Dataset. (OEV Analysis).

¹¹⁶ CE and CFM 2022 survey results report.

¹¹⁷ Ibid.

¹¹⁸ Ibid.

information management system that effectively captures, records and reports the feedback; community feedback mechanisms' capacity to handle sensitive cases (including sexual exploitation and abuse) being under question; and community-based data and feedback not systematically recorded or used for decision making.

180. **Finding 11: There is some written guidance for staff on the provision of victim assistance and services – including what support should be available –however staff feel more guidance is required to clarify the implications of the commitment to provide victim assistance and the authority to do so. Additionally, now, work is required to consider the new commitments to a broader, victim-centred approach based on principles that position victims at the centre and the forefront of prevention, detection and response.**

181. In June 2023 the IASC formally concluded the two-year process to agree the following definition of a victim-centred approach:

"A victim/survivor-centred approach places the rights, wishes, needs, safety, dignity and well-being of the victim/survivor at the centre of all prevention and response measures concerning sexual exploitation and abuse (SEA) and sexual harassment (SH)."¹¹⁹

182. The IASC definition broadly concurs with the WFP victim-centred approach definition as expressed in a footnote, for the first time, in the May 2023 Executive Director circular:

"A victim-centred approach is one for which the Victim's dignity, experiences, considerations, needs and resilience are placed at the centre of the process to respond to an allegation of SEA."¹²⁰

183. However, the IASC definition is accompanied by a three-page document intended to explain the purpose and principles behind the definition and provide guidance on how accountability to victims should be ensured and communicated through prevention and response. Currently WFP commitment –like the IASC commitment –is to a victim-centred approach although it should be noted that also in 2023 the United Nations issued a Victim Rights Statement, which seeks to ensure that the victim is understood to have rights (as articulated in the statement) that must be prioritized.¹²¹

184. While the internal commitment of WFP to a victim-centred approach was only communicated via the Executive Director circular in May 2023, WFP agreed in 2021 to the first recommendation of the IASC external review, which was to "commit to the application of a victim-centred approach in all aspects of PSEAH activity". By contrast, UNCHR now has a standalone "Policy on a Victim-Centred Approach in UNHCR's Response to Sexual Misconduct", which includes multiple provisions for well-being, assistance and support, monitoring and other dimensions of a comprehensive victim-centred approach.¹²²

185. WFP staff at all levels were unaware of the WFP commitment to a victim-centred approach and what this might mean in addition to longstanding commitments to the provision of assistance,¹²³ or the referral to gender-based violence services or how WFP engages with victims.¹²⁴ Awareness and understanding of a victim's rights was very rarely apparent among all informants other than a handful of experienced focal points.¹²⁵ Across the focal point network at regional bureau and country office levels, only very few focal points have been involved in any

¹¹⁹ IASC. 2023. IASC Definition & Principles of a Victim/Survivor Centred Approach.

¹²⁰ [WFP-0000149712](#).

¹²¹ See [victims_rights_statement_on_sea_may_2023_web_0.pdf](#). The Office of the Victims' Rights Advocate has placed a number of victim rights advocates in high-risk countries to advocate for victim rights and dignity to be maintained and increasing numbers of multilateral organizations are in the process of appointing victim rights specialists to support SEA as well as SH cases. As both case management and investigation are out of scope for the evaluation, the evaluation team is unable to determine or recommend to what extent, or whether, such capacity would be appropriate for WFP or the extent to which a commitment to victim rights would alter WFP policy and practice.

¹²² This policy: (i) clarifies what is meant in UNHCR when referring to a victim-centred approach; (ii) confirms the organization's commitment to apply a victim-centred approach in all (suspected) instances of sexual misconduct (sexual exploitation and abuse and sexual harassment); and (iii) spells out which entities are involved in and responsible for operationalizing a victim-centred approach in their work on sexual misconduct.

¹²³ VCA is a comprehensive approach that places victims at the centre of response efforts, focusing on their empowerment, rights, and long-term well-being, whereas victim assistance refers specifically to the immediate support and services provided to victims to address their immediate needs and mitigate the impact of victimization. See EU (2021) Guide: Victim-Centred Approach For Frontline Professionals Working with Trafficking in Human Beings.

¹²⁴ KII.

¹²⁵ A 'victim's rights approach' and acknowledgement of the role of the Office of the Victim's Rights Advocate and Senior Victims' Rights Officer was not acknowledged in any of the KIIs.

kind of assistance to victims (16 percent of focal point survey respondents; n=36), and no focal point specifically mentioned victim-centred approach commitments in relation to this.¹²⁶ Some informants feel that there is insufficient internal guidance, manuals and tools to direct the provision of victim assistance, let alone the more comprehensive victim-centred approach.¹²⁷

186. Interviewees at all levels expressed concerns about their lack of clarity on such obligations, and asked questions about the realism of WFP providing such support. It was frequently repeated that “WFP is not a protection agency” and several internal stakeholders felt that it would be more appropriate for other agencies, which had the relevant mandate and appropriate capacities, to ensure victim assistance.

187. Most country office-level stakeholders view both victim assistance and the broader victim-centred approach as being related to referrals, often through an inter-agency mechanism. They repeatedly stated that they felt they were “not well equipped” to provide “timely support”, with reference to broader obligations on victim assistance or a victim-centred approach.¹²⁸ External partners were similarly uncertain. For instance, cooperating partners in Mozambique noted a degree of confusion on victim assistance and the victim-centred approach, as they felt their primary function was to refer individuals to the appropriate authorities and were unsure “how far to go” or how to exercise their “own judgement” in providing support to victims throughout the process.¹²⁹ These informants also highlighted that there is “no official budget” for post-referral follow-up, although some informants stated that resources for referral and follow-up are provided on an ad hoc basis – although evidence for these expenditures were not forthcoming. The evaluation team also found that there is no guidance on costing and limits of expenditure on the victim-centred approach that focal points or senior management at the country office level can use to budget for victim assistance and the victim-centred approach.¹³⁰ It should be noted that OIGI asserted that they provide consistent feedback, based on clear protocols, to country offices.

188. A senior WFP staff member summarized the need to prioritize clarity on victim assistance and victim-centred approach guidance at the headquarters level, suggesting that work is still required within WFP regarding the commitments to victim assistance and the victim-centred approach that are already in place, noting that it is understandable that staff feel unable to address this:

“The WFP angle is 'what is committed' not about the victim's needs. There are entitlements associated with being a victim of sexual harassment, and these entitlements are different for an SEA victim. e.g. medical or psychosocial support varies. Ultimately, the answer is no: the [WFP] definition of 'victim' is not clear. Similarly, a 'complainant' and how this term relates to victim [e.g. whether a victim is a victim at the point they make the complaint]. [...] but what are the lines on prevention? We still need to clarify boundaries. . .”^{131,132}

189. OIGI reported that it has developed an internal (OIGI) guideline (a standard operating procedure) for the application of victim-centred approach principles in investigations. This standard operating procedure provides guidance on the application of IASC victim-centred approach definitions and on principles that are considered relevant to the investigation process. The principles are reported to be: informed consent; facilitation of access to referral pathways; respect for dignity and safety; and keeping victims informed regarding the process of the investigation.¹³³ The Ethics Office has reported that work is underway to produce a joint ETO/OIGI standard operating procedure to be finalized during 2024.

190. Many focal points raised concerns about potential and perceived conflicts of interest if PSEA focal points were to offer victim assistance while also serving as a liaison for the OIGI. Conversely, OIGI maintains that it cannot provide victim assistance, as investigators must both remain impartial and be perceived to be impartial; but it says that their investigators are too often drawn into advocating for assistance to be provided to victims as no other WFP unit or division is providing this support. Focal points and OIGI agree that the Ethics Office plays a consistently

¹²⁶ See Annex 9 for further detail.

¹²⁷ 10 KIIs.

¹²⁸ 6 KIIs.

¹²⁹ 2 KIIs.

¹³⁰ 2 KIIs.

¹³¹ KII.

¹³² In the context of this KII quote, it is necessary to mention that the 2023 ED circular does provide corporate guidance on the definition of an SEA victim: “a person who is, or has been, subject to SEA by a WFP employee, or an employee or other related personnel of a cooperating partner”, a definition that has been adopted from the UN Protocol on the Provision of Assistance to Victims of Sexual Exploitation and Abuse 2019.

¹³³ KII in data collection and written comments received February 2024. The SOP has not been available to the evaluation team.

constructive supportive and liaison role. Interviewees at headquarters agreed that money is ‘found’ if it is required for individual support. It is unclear how sustainable this approach would be if there were to be an increase in the number of cases as there is evidently a systemic gap now.

191. Feedback received from the WFP Board and from senior management in headquarters confirmed that the lack of integration of the victim-centred approach to date is an area of concern, albeit one that was familiar to several United Nations agencies.

“MOPAN's review of six multilateral agencies revealed that there was poor common understanding of what is meant by a victim-centred approach – does WFP have a means of testing understanding/approaches?”¹³⁴

192. **Finding 12: More is required to ensure that country offices have the support they need to effectively understand their exposure to sexual exploitation and abuse risk and how to mitigate this. Current guidance, manuals and tools are not routinely utilized and when sexual exploitation and abuse assessments and plans exist, progress against them is not monitored. The evaluation team found that an absence of sexual exploitation and abuse reports is not perceived as problematic by WFP managers. An absence of reports tends to remain unnoticed and does not act as a trigger to understand either if reporting channels are fit for purpose or if barriers to reporting are being properly understood and addressed.**

193. A template for country office-level annual risk registers exists and is required to be completed by all WFP country offices (available to the evaluation team for 11 out of 13 countries reviewed). WFP provides extremely limited guidance on incorporating sexual exploitation and abuse risks into the risk register and upon what mitigations may need to be considered.¹³⁵ Inclusion of sexual exploitation and abuse in risk registers varies across different country offices. Of the country office case studies in this evaluation, only five included a mention of sexual exploitation and abuse within their risk registers in 2022, even though contextual conditions and the nature of programming in the context (mainly direct delivery) indicated that it should be considered a significant risk.¹³⁶ In these examples, sexual exploitation and abuse sat primarily under two risk types: 2.1.2 “Lack of protection”¹³⁷ and 3.2.1 “Policies and standards”.¹³⁸

194. The inclusion of sexual exploitation and abuse as a risk in these five countries varies as WFP provides no clear guidance on best practice regarding sexual exploitation and abuse risk mitigation. Three countries (Nigeria, South Sudan, Uganda) explicitly include sexual exploitation and abuse as an independent line in their risk register, while Mozambique and Pakistan include sexual exploitation and abuse under a broader protection line.¹³⁹ However, across all five countries, and despite contextual diversity, there is a general consensus about likelihood and impact of these risks occurring – on average across these five countries, impact and likelihood both sit at 4 (on a scale of 1 to 5), which translates into likely occurrence and potentially severe impact of the risk.¹⁴⁰

¹³⁴ Executive Board survey. MOPAN: Multilateral Organization Performance Assessment Network.

¹³⁵ The Risk Management SOP does not include any reference to PSEA (see: WFP (2022). Risk Management Division. Risk Monitoring Standard Operating Procedures.) and the risk register template and catalogue that is used by country offices to produce risk registers only includes SEA as an example risk under the ‘Lack of protection’ risk type, without any further guidance on how to adapt this to SEA risks of all kinds. Similarly, the Protection and Accountability to Affected Populations (AAP) Analysis Guidance Note (2023) only provides a note suggesting that PSEA focal points be engaged in dialogue on risk analysis, but no further advice is provided.

¹³⁶ Mozambique, Nigeria, Pakistan, South Sudan, Uganda.

¹³⁷ Risk category: Operational > Risk area: Beneficiary health, safety and security > Risk type: Lack of protection.

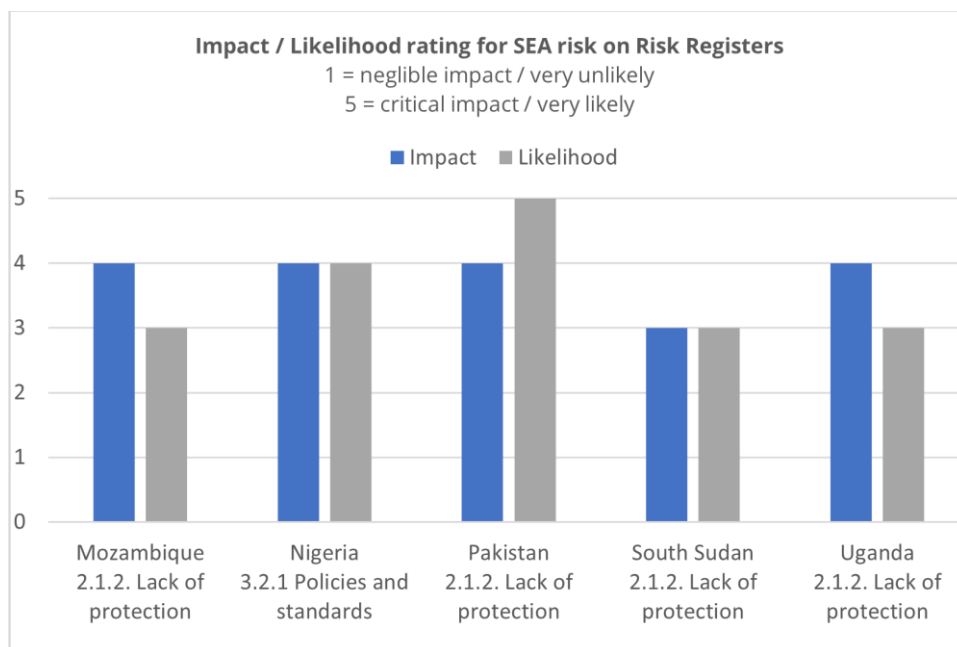
¹³⁸ Risk category: Fiduciary > Risk area: Breach of obligations > Risk type: Policies and standards.

¹³⁹ Pakistan: “The difficulty to ensure maximum protection of beneficiaries (including increased exposure to domestic violence) and related personnel during interventions.” Mozambique: “Beneficiaries are exposed to protection risks as a result of assistance (extortion, violence, safety, accidents).”

¹⁴⁰ Impact scale – 4 (Severe) = “Severely injurious or severely psychologically traumatic effect, there may be a limited number of fatalities”.

Likelihood scale – 4 (Likely) = “Historic occurrence: One or more times in the last 12 months. Forward looking: Likely to happen in the next 12-24 months”.

Figure 7. Impact or likelihood rating for sexual exploitation and abuse risk on risk registers



Source: Itad team informed by WFP risk register dashboard. 2023.

195. Mitigation measures and actions across all five countries are predominantly focused on increased staff training, as well as training for cooperating partners and vendors, beneficiary sensitization, the development of PSEA and protection action plans and strengthening community feedback mechanisms and reporting tools (including better usage of data). The evaluation did not find examples of redesign of programmes to mitigate risk. However, these five country offices have also identified support and resources required to successfully undertake these mitigations measures, including increased support to the country director and to monitoring and evaluation.

EQ2C. How does WFP human and financial resourcing enable PSEA?

196. **Finding 13: Human resource capacity building for PSEA is primarily undertaken via mandatory onboarding online courses with consistently high compliance. However, training lacks systematic follow-up for quality checks and routine refresher training, even during emergency response staff surges.**

197. As of January 2024, the percentage of employees who have a valid completion for all mandatory courses, including the mandatory course on PSEA was 79 percent.¹⁴¹ WFP staff interviewed for this evaluation all reported taking mandatory online training – which was updated and re-launched in 2023 (and which also covers anti-fraud and anti-corruption).¹⁴² The training is part of the induction process for all new staff and should be repeated every three years. When asked about their capacity and knowledge on PSEA, this online training was the reference point made by most staff. The training is also one of the four key performance indicators related to the corporate results framework management result No 2: People management (see EQ2B-3 for a fuller explanation of the relevance of the corporate results framework). The WFP Code of Conduct for staff is signed simultaneously with the employment contract and hence is only signed once, with no follow-up requirement to refresh such commitments. Many managers interviewed, including at the most senior level in headquarters, said that the online training did not help them to address PSEA in their particular roles,¹⁴³ while about half of the country directors and deputy country directors requested annual learning.

¹⁴¹ Internal WFP data (PACE website).

¹⁴² As of January 2024, the percentage of employees who have a valid completion for all mandatory courses, as reported on the PACE website, including the mandatory course on PSEA was 79 percent.

¹⁴³ KII.

198. All human resources staff interviewed reported that it is part of their role to monitor staff compliance for the online training, but gave various responses when asked whose role it is to reinforce the importance of PSEA to new staff. In three countries visited there have been workshops or “road tours” on ethics, which include PSEA and sexual harassment and which were described by human resources as very successful. In at least two countries these road tours were followed by an increase in complaints,¹⁴⁴ although these complaints were reportedly mainly for sexual harassment.¹⁴⁵ Several interviewees suggested that the training was a “box-ticking” exercise, by which they meant an exercise to explain the rules. Ideally, they feel that once the rules are explained what was needed was discussion about why it matters and how the rules should be applied.¹⁴⁶

“Our compliance rate for the [mandatory online] training is 93 percent. As HR we cannot control this but must closely follow and remind on the online training. But of course, we don’t know what they understand in the online training. People complete but they might not understand as it is not in their mother tongue. It is everyone’s responsibility to explain PSEA as sometimes training is not sufficient. We didn’t receive direct guidance from regional bureaux or headquarters on PSEA or SH so we [HR] don’t talk to people about this.”¹⁴⁷

199. In the focal point survey, 75 percent (n=140) of survey respondents described the training they received from WFP as adequate; on the other hand, when interviewed, many of these questioned the extent to which they themselves understood the principles and obligations outlined in the training.

200. The PSEA focal point was not part of the induction schedule in the seven country offices visited by the evaluation team.¹⁴⁸ At least half of the focal points did not feel that they are sufficiently trained to deliver training or inductions and one reported requesting that the inter-agency coordinator undertake such sessions on their behalf, however this issue was not fully discussed in each visit, so the number may be higher.¹⁴⁹

201. If a country office is receiving surge or other internal temporary staff as part of an emergency response, no additional screening is required by the country office to ensure all mandatory training was already done, and they would not know how long ago the mandatory training may have been completed by the surge or temporary staff members.¹⁵⁰ No WFP staff member interviewed was able to remember any briefing or information about context-specific sexual exploitation and abuse risk or PSEA during a surge deployment.

202. WFP uses the “ClearCheck” screening platform, which serves as a crucial organizational and United Nations-wide tool designed to prevent the employment or re-employment of individuals whose association with the system was terminated due to findings of sexual harassment or sexual exploitation or abuse.¹⁵¹ As this only confirms whether new employees have been previously terminated from a United Nations position, it may not address all candidates. Whether ClearCheck is used for standby partner representatives, and other such arrangements was unclear to global cluster leads. However, additional due diligence is now conducted via comprehensive pre-recruitment forms. These now feature focused inquiries on conduct, prior investigations, disciplinary actions and involvement in sexual exploitation and abuse. Recent technical webinars provided global human resource officers with advanced training on PSEA. Future automation via the Workday Platform may reduce errors and ensure uniformity. Additionally, “One HR” services are utilized for academic, professional and criminal background checks during recruitment.¹⁵²

203. Finding 14: The establishment of the PSEA function within the Ethics Office has been central to WFP progress on PSEA since 2018 but has had limited resources to support its function until 2023.

204. In terms of headquarters capacity, prior to 2018 there was reportedly no PSEA function (in headquarters) per se, although there was a task force with a workplan involving gender, protection and accountability to affected populations.¹⁵³ Concurrent with the establishment of the Ethics Office as the corporate and organizational focal point for PSEA, PSEA became part of the routine reporting to the Executive Board (previously, progress was

¹⁴⁴ As these cases have not yet been resolved the countries asked not to be identified.

¹⁴⁵ KII.

¹⁴⁶ KII.

¹⁴⁷ KII.

¹⁴⁸ KII.

¹⁴⁹ KII.

¹⁵⁰ Ibid.

¹⁵¹ WFP. 2020. Update on WFP’s role in the collective humanitarian response; 2 KIIs.

¹⁵² Report feedback.

¹⁵³ KII.

presented as an annex in the annual performance report).¹⁵⁴ The stimulus for these shifts is reported to be donor requests and was associated with the renewed donor focus on PSEA in 2018 following the scandal related to non-governmental organization (NGO) sexual exploitation in Haiti,¹⁵⁵ as well as the “#metoo” and “#aidtoo” movements.¹⁵⁶ A senior manager in headquarters confirmed that WFP had to “learn very fast in 2018” and noted that it “could all have been done sooner”.¹⁵⁷

205. The WFP Ethics Office capacity in 2018 consisted of one full-time P4 position plus 50 percent of a junior consultant. This has evolved to an informal unit within the Ethics Office in 2023 of one full-time P4 position, 50 percent of a P3 position and four consultants, two of whom are dedicated to support “PSEA and partnerships”.¹⁵⁸ Interviewees reported that the volume of work on PSEA “was much greater than anticipated, and there are clear indications that the Ethics Office provides support that was not previously available”. For example, the Ethics Office responded to 66 “technical advisory” requests in 2018, which escalated to 300 in 2022.¹⁵⁹ The evaluation team was not able to obtain data on the quality of delivery in relation to these requests (as no formal feedback mechanisms exists for this), but was informed that the advisories included: the facilitation of victim support; inputs into standard operating procedures and PSEA workplans for country offices; advice to country offices on how to process in the event of incidents of sexual exploitation and abuse; capacity strengthening assistance; provision of training materials and advice on adaptation of these materials; and resource provisions.¹⁶⁰ There are no PSEA focal points in other headquarters departments. In terms of accountability, the Ethics Office’s reporting line is indirectly connected to the Workplace Culture Department, and reports directly to the Office of the Executive Director.¹⁶¹

Box 8. Peer organizations: Global PSEA capacity

The comparative exercise conducted for the evaluation (Annex 17) found that UNHCR had created a D1 senior coordinator position to lead UNHCR work on sexual exploitation and abuse and sexual harassment in 2018. This post reports directly to the UNHCR Deputy High Commissioner, who also chairs an emergency task force to coordinate efforts and provide oversight, including monitoring the PSEA action plan. In 2023, UNHCR had a headquarters team of seven, which focused on developing PSEA strategy policies, training and other centralized support. This includes support to more than 400 PSEA focal points designated across operations. In addition, the senior coordinator coordinates a multi-functional team consisting of senior representatives from Ethics, Human Resources, Legal Affairs, Ombudsman, Protection, External Communications, Risk Management, Strategic Planning and Results, and the Inspector General’s Office, all of whom are engaged in activities to support the prevention of sexual exploitation and abuse and sexual harassment. The headquarters team has surged to the field when required, for example in response to the Ukraine crisis in 2022.

UNICEF has had a PSEA and sexual harassment coordinator in the Office of the Executive Director and an established unit in headquarters, led by a P5 position to operationalize PSEA as well as child safeguarding, since at least 2019. The unit reports to the Deputy Executive Director for Management. It provides advice and coordination functions across the organization. P4 positions are in place in all regional offices. UNICEF has a network of national and international PSEA specialists, and emergency response procedures at L1, L2 and L3 include specific scale-up procedures for PSEA. Furthermore, see Figure 11 for a comparison of reporting numbers by expenditure.

206. **Finding 15: WFP has established a focal point network across country offices and regional bureaux providing an excellent foundation for delivering on PSEA commitments, although it requires significant additional capacity building to optimize its efficacy.**

¹⁵⁴ WFP. 2109. WFP/EB.A/2019/4-B.

¹⁵⁵ The New Humanitarian. 2018. [Where do we go from here?](#)

¹⁵⁶ KII.

¹⁵⁷ KII.

¹⁵⁸ Staff resourcing mapping conducted by Ethics Office in 2023 (Annex 15).

¹⁵⁹ WFP. 2018; 2022. Ethics Office Annual Report.

¹⁶⁰ Ibid.

¹⁶¹ In 2018-2019, the Ethics Office reported directly to the Executive Director with support provided by the Deputy Executive Director. From 2020-2023 inclusive, the Ethics Office’s reporting line was moved to the Workplace Culture Department. As of January 2024, the Ethics Office returned to reporting directly to the Executive Director.

207. Although WFP country directors have been expected to appoint a senior manager as PSEA focal point since 2005,¹⁶² there is no historical memory of how these focal points were guided and supported and how the impact of their activity was monitored.

208. The Ethics Office assumed administration of the PSEA focal point network in 2018 and has formalized and expanded it from 278 staff, to “around 400” in 2021 and to 523 in late 2023.^{163, 164} This provides a strong foundation to enable WFP PSEA commitments to be operationalized at regional bureaux and country office levels. However, staff at regional bureaux – whether deputy regional directors, heads of programmes or gender and protection advisers – report uncertainty about the regional responsibility in the PSEA architecture.¹⁶⁵

“PSEA is very centralized. Ethics Office sends out the communication directly to country offices, Ethics Office manages the [FP] mailing list, so what is our role at regional level, what are our functions? We [gender and protection advisers] are not PSEA focal points on paper, but we end up doing most of the work on PSEA. There is no ToR or structure for us to abide by [at regional level].”¹⁶⁶

209. Stakeholders consistently acknowledged that there was a need for further clarity on individual roles and responsibilities, especially for those at the regional level and the focal points.¹⁶⁷ The approach formalized by WFP a decade ago – that the deputy country directors and regional deputy directors should be the focal point in each office, with an alternate focal point at the technical level and additional PSEA focal points as required by the programme structure – should be effective. However, it depends on knowledge, technical capacity and time available for the deputy country directors and the alternate to understand the responsibilities. Focal points consistently reported these three factors to be a significant limitation.

210. Most country directors and deputy country directors interviewed feel that they have limited knowledge to fulfil their focal point role or that they have “twenty thousand other things to do”.¹⁶⁸ The latter is also a limiting factor when emergencies or other scale-ups occur, this being also a point when PSEA efforts are most critical.¹⁶⁹ Focal point alternates also have parallel commitments – primarily under the banner of protection, the gender unit, accountability to affected populations or as regional humanitarian advisors (16 percent of PSEA alternates are also protection, gender or accountability to affected populations advisors).¹⁷⁰

211. Most focal points are relatively new to the role: 29 percent of survey respondents have been in it for less than one year, 32 percent for between one and two years, and 25 percent for between three and four years. Despite now receiving standalone training in addition to mandatory e-learning commitments,¹⁷¹ the focal point survey (see Annex 9) showed that approximately 35 percent of focal point respondents who had been in their role for less than two years called for more or additional training. Further, only 41 percent of overall respondents felt that the support they received as a focal point was ‘adequate’, with many focal points advocating for their additional support and resourcing needs¹⁷² (see Box 9).

Box 9. What could WFP do better to support you as PSEA focal point?

The main suggestions on how WFP could better support PSEA focal points include, but are not limited to:

- increase the regularity of training and capacity building activities;
- increase the in-person training alongside clearer guidance and terms of references;

¹⁶² WFP. 2005. OED2005/004.

¹⁶³ WFP. 2018; 2021. Annual Ethics Report; List of PSEA focal points as of 12 September 2023.

¹⁶⁴ WFP. 2019. Annual Ethics Office report.

¹⁶⁵ 3 KIIs.

¹⁶⁶ KII.

¹⁶⁷ 8 KIIs.

¹⁶⁸ KII.

¹⁶⁹ KII.

¹⁷⁰ PSEA focal point survey.

¹⁷¹ WFP. 2019. Ethics Office report. ETO launched e-learning for PSEA focal points.

¹⁷² For further information on this, see Annex 9

- ensure formal training for both main and alternate focal points to ensure plans of action and knowledge consistency;
- mentor support alongside sharing general information on PSEA across the different level of WFP action;
- further financing and resource allocation for PSEA across WFP;
- psychosocial support for PSEA focal points;
- promote and create forums for experience exchange and learning sharing between PSEA focal points and country offices;
- establish the PSEA focal point as a position in each field office so there is always a specific person for PSEA;
- bring local and international context to the understanding of PSEA;
- increase availability of tools to promote collaboration among partners;
- nominate higher-level PSEA focal points at the field offices mixed with national staff for accountability; and
- raise beneficiaries' awareness around PSEA.

212. A barrier to more formally recognizing focal points' work is that currently job categories relating to gender, accountability to affected populations, protection and PSEA are classified as cross-cutting. This classification prevents country office-level human resource teams from formally developing standalone PSEA roles, though best practice in South Sudan indicates that this can be possible (see Box 10). This also creates challenges for regional advisers who are uncertain what their place is in the "PSEA architecture", with one regional gender adviser reporting that they were being asked by headquarters why they were so engaged on PSEA and provision of support to focal points at the country office level.¹⁷³

Box 10: Dedicated human resources for PSEA in South Sudan country office.

South Sudan's WFP office is unique in having a full-time PSEA adviser and regarding this as crucial in addressing sexual exploitation and abuse risks effectively within a high-risk context. The adviser plays a vital role in implementing corporate commitments, emphasizing survivor-centric approaches, and enhancing community-based complaint mechanisms. Their activities include annual planning, staff training, capacity assessments and supporting victim-centred investigations. The leadership notes positive changes like increased staff engagement, proactive risk mitigation and improved responses to sexual exploitation and abuse allegations. The adviser also engages in donor relations, accountability and inter-agency forums, positioning WFP as a PSEA leader and managing media responses to sexual exploitation and abuse incidents. Given South Sudan's context, the leadership deems the role essential for WFP PSEA mainstreaming and ensures dedicated budgetary support.

213. Focal points do not have formal responsibility reflected in annual performance appraisals. For example, having responsibility for PSEA is not matched with a corresponding mandatory field about PSEA activities undertaken in annual performance appraisals (Performance and Capability Enhancement – PACE) for relevant staff. There is some appetite from a range of staff for this to be included both for the senior management level and in other key roles (for example, heads of programmes).¹⁷⁴

"Most country offices don't have a PSEA officer, just an FP. It should be a full-time job. This person's duty should be to strengthen the capacity of others."¹⁷⁵

214. **Finding 16: Internal systems and budget allocations for PSEA at the headquarters level are not protected and are vague and poorly documented. This is echoed at the country office level, where budgeting on PSEA is limited, inconsistent and applied in an opportunistic and sporadic way.**

¹⁷³ KII.

¹⁷⁴ 4 KIIs.

¹⁷⁵ KII.

215. The Ethics Office does not capture country office-level PSEA budgeting and expenditure data, nor does it have a track record of having designated budgets for developing and maintaining PSEA systems since 2018.¹⁷⁶ Key informants in the seven country offices visited routinely referred to budgeting shortfalls and a lack of ring-fenced budget for PSEA. For example, feedback from key informants confirmed that “WFP is not thinking about allocating appropriate budget to manage PSEA”, that “headquarters expects high-quality programmes with zero resources” and that the “budget is really small”.¹⁷⁷

216. For 11 of the 12 country offices reviewed, although budgeting data were provided, the evaluation team was unable to develop a comprehensive longitudinal analysis on PSEA budget allocation and expenditure between 2018 and 2023, as only three provided budgets that included a direct reference to PSEA.¹⁷⁸ Through comparing the PSEA budget allocations of these three country offices to their annual expenditure and to their protection budget allocations, the evaluation team was able to discern that the highest proportional allocation of PSEA is demonstrated in Cameroon (0.16 percent of annual expenditure) and the lowest is in Bangladesh in 2018 (0.02 percent).

217. In a very small handful of cases, PSEA budgets could be loosely contrasted to comparator organizations. These examples showed that these known WFP allocations for PSEA at the country office level – housed under the protection budget – are, notwithstanding contextual diversity, and recognizing UNICEF’s protection mandate, likely to be far lower than those allocated by UNICEF. Taking the example of Cameroon, the UNICEF country office requested 1.59 percent of their overall budget for PSEA in 2023. In comparison, the WFP country office has an annual budget allocation of 1.57 percent for all their protection and gender activities, of which PSEA activities only make up a very limited amount. This means that UNICEF requests a proportion of budget allocation for PSEA that is almost the same as the entire proportion of the protection budget for WFP Cameroon.

218. Country office managers state that budgets are available for PSEA activities on an “as needed” or ad hoc manner, making activities challenging to track. For example, triangulated feedback from four focal points at the country office level confirmed that “unlike gender, which is thought-through in the CSP and is supported by a gender policy”, PSEA is allocated depending on un-systematic funding requests because it is not mainstreamed into the country portfolio budget.¹⁷⁹ Similarly, a head of finance at the country office level declared that until very recently, the protection officer responsible for PSEA was a “lone soldier for many years and never had funding” and that they had to “scramble for everything” from a locally generated fund.¹⁸⁰

219. Focal points agree that if they request budget to support activities, managers respond positively. Focal points do not provide a clear view on how resources for PSEA should be scaled up and whether there should be a mainstreaming approach into programme budgets, a core management cost, or whether PSEA budgets should remain under protection and gender to avoid dilution.¹⁸¹ Instead, focal points working under protection usually stated that “we get what we ask for” – although these requests are usually tempered by precedents or a lack of understanding of the full costs associated with a comprehensive PSEA system at the country office level.¹⁸²

220. An understanding of expectations framed specifically around resource mobilization for PSEA is limited across headquarters, regional bureaux, and country office levels, although some key informants can liaise directly or indirectly with donors to promote resource allocations on PSEA. For example, staff in a partnerships unit at a country office confirmed that donor reporting on PSEA is increasingly commonplace and that donors are “increasingly interested in learning and practice” and that PSEA reporting can be “heavy” and “up to 10 percent of a reporting template”.¹⁸³

¹⁷⁶ Email communication with Ethics Office, Nov 2023.

¹⁷⁷ 3 KIIs.

¹⁷⁸ Bangladesh, Cameroon, Mozambique.

¹⁷⁹ KII.

¹⁸⁰ KII.

¹⁸¹ KII.

¹⁸² 2 KIIs

¹⁸³ KII.

2.3. EQ3. How does WFP strengthen external coherence on PSEA for improved implementation?

221. Since 2018, WFP has played an increasingly visible and substantive role in the IASC and in United Nations system-wide PSEA activity at the global technical level. WFP can also demonstrate increasing levels of contribution to inter-agency PSEA networks at the country level, although this is not yet applied across all countries. Importantly, WFP is systematically adopting inter-agency processes for assessing capacity of cooperating partners (the United Nations Implementing Partner PSEA Capacity Assessment Tool) which is a valuable step forward but is placing a – short to medium term – significant burden on country offices, which would value additional support. This will provide WFP with certainty about overall risk across the country portfolio, however, the burden of assessing the portfolio upon country offices has been significant and it remains unclear how capacity building can be supported. Aside from the assessment it is unclear that sexual exploitation and abuse risk identification and mitigation for NGO partners is considered beyond standardized cooperating partner frameworks compliance. Additionally, there is no customized capacity building approach regarding PSEA for private sector partners, financial service providers, standby partnerships and others that may engage with communities and beneficiaries differently from NGOs. There is a lack of clarity among staff on how to address PSEA as WFP moves upstream to adopt a more “enabling” role with governments.

2.3.1. EQ 3A. How well is WFP leading and engaging appropriately with inter-agency platforms and initiatives to address PSEA?

222. **Finding 17: Since 2018, WFP has substantially increased its technical contributions to addressing PSEA at the global level in inter-agency platforms and engaging in inter-agency and bilateral PSEA- related projects.**

223. As a member of the IASC, WFP participates in the IASC Principals’ meetings, where PSEAH is a standing agenda item. WFP is also a member of the United Nations High-Level Steering Group on Sexual Exploitation and Abuse, enabling the WFP Executive Director, Deputy Executive Director and other senior managers to engage in the strengthening and alignment of the United Nations system-wide response to sexual exploitation and abuse. As an IASC Principal, the Executive Director endorsed a recommendation suggesting that mainstreaming PSEA through the cluster system, and across the diverse range of actors that participate in a coordinated international humanitarian response, would be important for embedding PSEA within rapid onset responses.¹⁸⁴

224. Before 2018, WFP did not play a consistent technical role in PSEA-related IASC coordination, but since the establishment of the PSEA function in the Ethics Office, WFP has been active in the technical advisory group at the global level, participating in all IASC PSEA-related technical-level workstreams, although it is currently not leading workstreams. The substantially increased and visible role that WFP has played on PSEA within the IASC was a strategic choice on the part of the Ethics Office, which saw opportunities for WFP to add value at the inter-agency level while “foundations” were being laid internally.¹⁸⁵

225. The notable contributions of WFP to inter-agency PSEA activity have also increased every year since 2018, including strategic partnerships on the issue with the International Organization for Migration (IOM)¹⁸⁶ and UNHCR.¹⁸⁷ Among other contributions, WFP has supported the development of a multi-agency learning package, which was launched during the COVID-19 pandemic, contributing to the delivery of adapted remote webinars.¹⁸⁸ WFP played a key role in the development of the IASC strategy and action plan for PSEA, the IASC PSEA principles-revised language: Principle 4, and the United Nations system-wide incident reporting form.¹⁸⁹ WFP has also played an increasingly active role in the updating of the United Nations Implementing Partner PSEA Capacity Assessment

¹⁸⁴ 2021. IASC. External Review of PSEA/SH [IASC / PSEA](#).

¹⁸⁵ KII.

¹⁸⁶ WFP. 2022. WFP, IOM and Translators Without Borders partner to raise awareness on protection from sexual exploitation and abuse.

¹⁸⁷ WFP. 2020. Mitigating Risks of Abuse of Power in Cash Assistance (MRAP): A joint UNHCR-WFP project.

¹⁸⁸ IASC. 2020. Learning Package on Protection from Sexual Misconduct for United Nations partner organizations.

¹⁸⁹ WFP. 2019. PSEA Update – 2nd edition.

Tool, prior to starting to roll this out across WFP country offices from late 2022 onwards.^{190,191,192} These achievements are particularly notable given the limited headquarters capacity for PSEA compared to peer organizations. WFP also raised the visibility of PSEA via a standalone agenda item in the 2023 Annual Partnership Conference.

226. It is unclear whether WFP leadership has fully engaged with agencies whose leaders have previously held the IASC PSEAH Championship to understand the level of support that is required. Previous Champions have had senior level posts (P5 and above) positioned to directly support the Champion.

227. **Finding 18: WFP has not yet fully realized its capacity to lead the embedding of PSEA across the cluster system including in new emergency responses. However, work is planned to rectify this starting with the food security cluster (FSC).**

228. Although there is reference to PSEA in the Food Security Cluster Manual, many interviews suggested that at the country level, the WFP-designated food security cluster co-leads were unclear of their responsibilities related to PSEA.¹⁹³ WFP has not previously considered how its leadership of the logistics and emergency telecommunications clusters and co-leadership of the food security cluster could be used to broaden awareness of sexual exploitation and abuse risk and PSEA compliance among standby partners and clusters members including NGOs, the private sector, donor representatives etc. There are also opportunities, such as the logistics cluster field-based preparedness project, through projects led by global cluster leadership.^{194 195}

229. There are many other operational opportunities to leverage WFP influence for positive change on PSEA. For example, in northwest Syria the inter-agency PSEA network stated that (in common with many other contexts), drivers from private sector companies were one of the top two job categories that were the subject of sexual exploitation and abuse complaints.¹⁹⁶ WFP is the logistics cluster coordinator and maintains the logistics hub. WFP logistics staff were unaware of complaints received, and uncertain what sexual exploitation and abuse awareness-raising may have been done among private sector contractors and individual drivers.¹⁹⁷ Staff had never seen PSEA awareness materials at the logistics hub.¹⁹⁸ Staff were keen to address the matter but had not previously considered this to be part of their responsibility.

230. Diversity in cash policy and women's economic empowerment is a key strategic aim of the WFP Cash Policy alongside other WFP delivery modalities.¹⁹⁹ Recent years have seen humanitarian actors that utilize cash-based assistance modalities becoming increasingly focused upon gender equity and women's economic empowerment. Internal and external interviewees concurred that this growing sectoral recognition of the gender dimensions of cash assistance among agencies has led to stronger policy and technical guidance on protection, gender and gender-based violence – but not specifically on sexual exploitation and abuse risk and mitigation.²⁰⁰ Given that 35 percent of the food assistance WFP delivered in 2022 was in the form of cash,²⁰¹ WFP plays an influential role in terms of humanitarian sector cash policy and practice. An opportunity exists to consider if, and how, actors providing cash assistance can better understand the sexual exploitation and abuse risk across cash-based transfer modalities.^{202,203}

¹⁹⁰ IASC. 2020. United Nations Implementing Partner PSEA Capacity Assessment.

¹⁹¹ United Nations. 2023. Fact sheet on the Secretary-General's initiatives to prevent and respond to sexual exploitation and abuse.

¹⁹² KII.

¹⁹³ KII.

¹⁹⁴ KII.

¹⁹⁵ June. 2021. Logistics Cluster: Field-based preparedness project: The capacity transformation process.

¹⁹⁶ KII.

¹⁹⁷ 2 KIIs.

¹⁹⁸ KII.

¹⁹⁹ WFP. 2019. The potential of cash-based interventions to promote gender equality and women's empowerment.

²⁰⁰ CALP Network. 2023. [The State of the World's Cash 2023](#).

²⁰¹ WFP. 2022. Cash Policy.

²⁰² CARE USA.2019. [A companion guide to the IASC GBV Guidelines](#).

²⁰³ 2 KIIs.

Box 11. Cash-based transfer policy

In the 2023 Cash Policy, WFP asserts an ongoing commitment to safeguarding individuals from sexual exploitation and abuse throughout its cash-based transfer (CBT) operations.²⁰⁴ The evaluation found little evidence that this had been a deliberate consideration in the design or monitoring of cash-based transfer programmes and that staff responsible for cash-based transfer programmes were not consistently engaged on the issue. Advisers working on cash-based transfers regionally noted progress stating that, often, protection assessments were now conducted before programme initiation but were uncertain whether sexual exploitation and abuse risk was included, considering it the responsibility of protection-focused colleagues.²⁰⁵ They highlighted that financial service providers (vendors) may not be PSEA-capacity assessed if not requested by managers. A senior manager with responsibility for cash-based transfers noted “we haven’t yet seen the kind of monitoring that would lead to us having confidence in CBT operations [from a PSEA perspective]”.²⁰⁶

Senior management expressed concerns about insufficient monitoring to ensure PSEA compliance in cash-based transfer operations. Although a 2020 joint analysis with UNHCR identified sexual exploitation and abuse as a critical risk, follow-up actions remain unclear. This analysis also highlighted issues with financial service providers potentially lacking understanding of humanitarian principles.²⁰⁷ While contracts include PSEA clauses, tailored orientation and training for non-humanitarian actors are lacking.

The evaluation team attempted to identify where sexual exploitation and abuse risk was mapped and mitigated for in cash-based transfer programmes. However, sexual exploitation and abuse risks within cash assistance were not identified in analysis or monitoring materials, posing ongoing challenges to PSEA integration within cash-based transfer operations.

231. Finding 19: Increasingly, WFP has contributed to Inter-agency PSEA networks at the country level, co-chairing directly and providing resources for coordinators elsewhere in different contexts. However, diverse degrees of engagement at the country level in PSEA present a picture of unsystematic engagement.

232. WFP has contributed to inter-agency PSEA networks at the country level by acting as co-chair at national and provincial levels in some contexts (for example in Mozambique, South Sudan and Pakistan), and taking the lead on workstreams in others (for example, in Türkiye, WFP is leading on the inter-agency network workstream for closer cooperation with the Government on PSEA).²⁰⁸ WFP is providing all or part of the resourcing for the PSEA inter-agency coordinator elsewhere (for example, in 2020 in Sudan, Colombia, Cameroon, Nigeria, Afghanistan and Mozambique), although often the WFP-supported PSEA coordinator is also “double-hatting” as the WFP PSEA alternate.²⁰⁹ The funding for these inter-agency coordinator posts has come through two main routes – some from the country office and some from the Ethics Office (where posts were usually 50/50 inter-agency and internal WFP focal point roles).²¹⁰ WFP is also, in many countries such as Mozambique, making a financial contribution to the activities of the inter-agency network.²¹¹ In many other cases however, the role of WFP in the inter-agency network was described as “participation”.²¹²

233. Several inter-agency PSEA coordinators interviewed for this evaluation struggled to identify any specific contribution made by WFP focal points or by country directors and deputy country directors at the humanitarian country team level on the theme of PSEA. They were also keen to stress that for WFP focal points this was not due

²⁰⁴ WFP. 2022. Cash Policy.

²⁰⁵ 2 KIIs.

²⁰⁶ KII.

²⁰⁷ WFP (2020) Mitigating Risks of Abuse of Power in Cash Assistance (MRAP): A joint UNHCR-WFP project.

²⁰⁸ KII.

²⁰⁹ WFP (2020) PSEA mid-year review.

²¹⁰ KII.

²¹¹ The total contributed is not aggregated.

²¹² 3 KIIs.

to a lack of commitment but due to the fact that they were double or triple-hatting and simply did not have the time.

234. By contrast, UNICEF contribution to inter-agency networks has been measurably more significant and consistent in terms of support to position inter-agency coordinators, in terms of resourcing inter-agency activity, and in terms of UNICEF focal points' active role in the networks during the time considered by this evaluation. In a refugee context, inter-agency coordination for PSEA falls under the auspices of the UNHCR refugee coordinator and the inter-agency PSEA coordinator should report to them instead of directly to the United Nations Resident Coordinator or humanitarian coordinator's offices as in other non-refugee contexts.²¹³

235. All country case studies indicate that WFP country offices have a high dependency on the inter-agency PSEA networks for learning, training and other activities.

2.3.2. EQ3B: How well is WFP engaging appropriately in partnerships with governments and donors to strengthen PSEA?

236. Finding 20: In common with other United Nations agencies, WFP currently has not provided regional bureaux and country offices with specific guidance on PSEA commitments relating to government partnerships.

237. United Nations agencies and IASC members recognize that engagement and partnership with governments (and community and local leaders) on PSEA is an area of risk that has not been effectively mapped and addressed by agencies across the humanitarian and development sectors. Hence in 2022 this was not included as a priority in the 2022-2026 IASC vision and strategy.²¹⁴ Since then, considerable work has been undertaken at the global level, including within a specific IASC workstream, and it is proposed that a 2024 provision on PSEA is to be included in every United Nations country cooperation framework referencing the main provisions as contained in the Secretary-General's bulletin.²¹⁵ It would not be appropriate for this evaluation to attempt to define the extent or limits of the WFP accountability chain on sexual exploitation and abuse in relation to partnership with governments in parallel to this inter-agency work.

238. Nevertheless, as WFP shifts towards an enabling model as per the current strategic plan, working more directly with multiple layers of government and in some cases with community structures particularly in middle income and urban contexts, WFP will need to be confident in its approach – even if WFP may not lead PSEA engagement with the government in a country. For example, the WFP School Feeding Strategy (2020–2030)²¹⁶ approach reflects a strategic shift to three models depending on context – whether direct implementation, a “transitioning” context, or fully government-led national programmes. Both Nigeria and Pakistan would be an example of these transition contexts. In these cases, WFP plays a technical advisory role in school feeding programmes and the memorandums of understanding with the governments of the countries in contexts such as these may be based on resource or upon technical or knowledge transfer. WFP staff interviewed were uncertain whether normal PSEA commitments apply and noted the limited capacity of WFP to engage the governments in PSEA in school-feeding programmes.^{217, 218} In Pakistan, consideration is being given to testing opportunities presented by a strong legislative framework supportive of having PSEA mechanisms in all government institutions.

²¹³ 2023. UNHCR. [Coordination on Protection from Sexual Exploitation and Abuse](#).

²¹⁴ 2022-2026. IASC. Strategy: PSEA.

²¹⁵ Email exchange December 2023 with the Office of the Special Coordinator on improving United Nations response to SEA (OSCSEA).

²¹⁶ WFP. 2020-2030. School feeding strategy.

²¹⁷ KII.

²¹⁸ 2 KIIs

Box 12: Good practice: Inclusion of PSEA in government legislative frameworks

In Mozambique, with the PSEA network, WFP helped to ensure inclusion of PSEA in the Government Code of Conduct for humanitarian actors and ensured a clause on safe and transparent targeting. In three provinces WFP has initiated a series of workshops on prevention of abuses of power, including SEA, with local government staff and local leaders in 15+ districts providing space for the government (disaster management and justice sector) to present local laws and policies related to abuses of power including SEA, and opportunities for key actors engaged in emergencies to seek clarification, raise concerns and understand their role for PSEA going forward.

239. Consultation with school feeding advisers in three separate regional bureaux concluded that “PSEA was not part of capacity assessment”.²¹⁹ WFP staff engaged in livelihoods or resilience programming in multiple countries also express similar uncertainties about if, and how, they have the responsibility, experience and knowledge to communicate PSEA obligations and support capacity in PSEA where WFP is playing a technical support role to governments at all levels, and where accountability chains involve different actors, such as the private sector. In Türkiye, where a livelihoods programme places refugees for traineeships in private sector companies through government agencies, this long accountability chain posed challenges as well as sparking debate within WFP about whether any incidents would constitute gender-based violence, sexual harassment, or sexual exploitation and abuse.²²⁰ In Pakistan, managers stressed that engaging more with the Government, implementing partners, community leaders and the private sector (in particular financial service providers) on PSEA was an essential part of the provincial office strategy as programming evolved from a direct delivery approach to technical support. A limitation is that they did not have the resources to do this given the demands placed upon the gender and PSEA adviser at the country office level.²²¹

240. WFP interviewees at country and regional levels in all regions consistently spoke about the sensitivity and challenges of raising the issue of sexual exploitation and abuse with government officials and about their uncertainty whether to raise the necessity for preventive activity with the authorities. The obligation for WFP country directors to communicate to all staff and partners about the responsibility to report all complaints and concerns is long standing and WFP has issued direct communications on the issue.²²² For instance, the Together We Say No (2022) campaign materials in 30 languages raise awareness on PSEA to multiple key stakeholders including cleaners, drivers, mobile money agents.

241. However, staff being interviewed occasionally questioned whether abuses of power by community leaders or officials involved in the delivery of WFP assistance are acts of sexual exploitation and abuse for which WFP is accountable or broader acts of gender-based violence for which WFP does not have the same level of responsibility. In one interpretation, reported to the evaluation team, the country team felt that the best-case scenario would be for the country office to address the matter directly with national partners and optimally, to see the person against which allegations were being made removed from the project.²²³ Reports of WFP management considering such rumours related to gender-based violence rather than sexual exploitation and abuse were presented to the evaluation team²²⁴ while country offices confirmed that obligations on PSEA were not part of formal bilateral dialogue with the governments even when a government was the biggest partner in the country, though they may be raised by other agencies or through the UNCT/UNHT.²²⁵

242. Country and regional WFP personnel were also uncertain how victim assistance would be supplied or a victim-centred approach would be applied in this situation, and what their obligation would be to monitor and follow up (see Box 13 for a victim-centred approach good practice).²²⁶

²¹⁹ KII.

²²⁰ KII.

²²¹ KII.

²²² KII.

²²³ KII.

²²⁴ KII.

²²⁵ KII.

²²⁶ UNHCR. Policy on a Victim-Centred Approach in UNHCR's response to Sexual Misconduct.

Box 13. Good practice in a victim-centred approach: Prioritizing victims

UNHCR emphasizes implementing a victim-centred approach in addressing sexual exploitation and abuse, as outlined in its SEA Risk Management Tool and a report on its 2022 Entity Action Plan (1, 2). This includes ensuring that victims receive assistance and support irrespective of whether they cooperate with investigations, providing immediate referral to relevant services, ensuring victims' physical protection through relocation if needed, and reporting allegations to appropriate government authorities when the perpetrator is a government official.

243. For WFP staff, uncertainty about PSEA in such contexts, and about the WFP accountability chain becomes even more complex when it comes to community representatives or authorities involved in making decisions about targeting or prioritization of WFP resources, especially when these community leaders report to government officials. In one country visited by the evaluation team, it was reported that there had been approximately ten "incident" complaints over a two-month period related to community leaders or "influential" people. Country office staff asked the regional office and headquarters for advice on how to appropriately handle this influx of cases without putting vulnerable people at risk but claim that they did not receive the guidance they needed.²²⁷

244. **Finding 21: There is a lack of proactive risk-related dialogue with donors about sexual exploitation and abuse and about sexual exploitation and abuse events occurring at national and regional levels.**

245. Country offices were rarely able to provide examples of where they have engaged proactively with donors on PSEA – although the extent to which donors had themselves raised the topic, varied across countries. As one head of programme explained, "PSEA has never been a conversation of substance with any donor".²²⁸ Among some focal points there is a sense of frustration that evidence of escalating risk is not consistently being used in advocacy with donors, especially where funding is being reduced. For example, WFP staff in Mozambique explained that the protection cluster has produced a report, which concluded that survival sex is on the increase related to increased vulnerability, reduced volumes of assistance and increased differentials of power between aid providers and potential recipients; however, the engagement with donors is still described as largely "reactive" on PSEA, with holding lines being prepared should they be required in the event of a case.²²⁹ Staff explained that support was available from the WFP regional bureau and headquarters when there was reputational risk but felt that this support for PSEA was limited due to capacity constraints for staffing reasons at the regional bureau level. Several country offices requested guidance in how to discuss prevention and risk management with donors, being aware of the high levels of sensitivity around such issues.²³⁰ As attention is paid to the implications of budget reductions in 2024 and the risks to vulnerable people, it may become more obvious that the organization is not suitably prepared to bring PSEA issues to the table in funding and other discussions.²³¹

246. Donors interviewed for this evaluation demonstrated a wide diversity of experience and views on WFP PSEA capacity. Most donors – interviewed at the country, regional or global level, and members of the Executive Board who responded to a survey – do express the view that vulnerability targeting and independently verified distribution lists should provide WFP with a renewed opportunity to take responsibility for monitoring sexual exploitation and abuse risk. A significant majority of donors consulted believe that WFP should be systematically resourcing effective PSEA measures that allow WFP to navigate protection challenges – including when beneficiary lists are provided by governments or community leaders with considerable power in vulnerable communities. Donors acknowledge that this comes with additional oversight costs, and they provide variable feedback on whether they are prepared to support these costs.²³² For example, one donor interviewed at the regional level expressed frustration about WFP not being forthcoming about PSEA activity or sexual exploitation and abuse risk assessments.²³³ The same donor expressed the view that other agencies – with a longer protection history and an official protection mandate – could become involved to "legitimize" WFP protection work and to support

²²⁷ KII.

²²⁸ KII.

²²⁹ 2 KIIs.

²³⁰ KII,

²³¹ GBV AoR. 2021 Gender-Based Violence in Emergencies. GBV AoR HD – Food Insecurity, Famine and GBV -19112021.pdf (pg. 6).

²³² 2 KIIs.

²³³ KII.

mainstreaming of a victim-centred approach across WFP targeting practices. It was noted that this support also needed to be tailored to the operational context. As a senior manager in one WFP country office said: “It is an issue that you must raise the money yourself [for PSEA capacity and activities]. WFP should ensure support for high-risk countries. We don’t have the conditions.... to reduce our PSEA activity.”²³⁴

247. At the global level, as discussed in EQ1, donors and Executive Board members have taken a strong stance on PSEA in recent years, and WFP has just secured the first major PSEA grant, which will support both internal PSEA systems development and capacity and enable WFP to put in place global public “goods”²³⁵ on cash-based transfers within food security and livelihoods work. WFP staff note that there is more to be done given the diversity of WFP operational partnerships, including with the private sector but, to date, this is not an area of discussion with donors. Some headquarters interviewees noted that Executive Board engagement on PSEA is sporadic mentioning that: “no Board question ever comes about private sector risks. The protection issue comes up, but the PSEA issue not so much.”²³⁶

2.3.3. EQ3C: How well is WFP supporting and engaging appropriately with cooperating partners to strengthen PSEA?

248. Finding 22: At the country level, WFP – supported by regional advisers, the Ethics Office and the NGO Unit – has taken positive steps to adopt inter-agency processes to assess the PSEA capacity of its NGO cooperating partner portfolio. However, in most cases country offices do not have additional support to conduct this activity. Expecting focal points to deliver capacity building of cooperating partners to reduce risk levels is not realistic given that focal points are often double or triple-hatting on responsibilities. In addition, WFP has not fully considered the risk posed by vendors, financial service providers and other non-NGO partners for whom the standard guidance, developed for NGOs, may not be accessible and for whom some tools are not applicable.

249. Cooperating partners are a key part of WFP programme architecture for PSEA. In 2022, for example, WFP channelled USD 3 billion or 65 percent of all funds through cooperating partners.²³⁷ PSEA is included in the cooperating partner field-level agreement used corporately.²³⁸ This lays out WFP guidance on PSEA and annexes the Secretary-General’s bulletin.

250. Collaborative efforts by WFP, UNICEF, UNFPA, and UNHCR have led to the development of the United Nations Implementing Partner PSEA Capacity Assessment Tool, as well as WFP-specific guidance (housed in the United Nations Partner Portal resource library and the WFP-Go portal). In coordination with IASC members and the United Nations Sexual Exploitation and Abuse Working Group, this tool aims to enhance accountability and build the capacity of implementing partners while preventing the duplication of processes and sharing of assessments. This tool is intended to give United Nations entities the necessary assurance of partners’ organizational capacities on PSEA, determine monitoring and support activities, and serve as a baseline for tracking progress in line with the minimum standards of the United Nations Implementing Partner Protocol.²³⁹ An assessment of medium or high risk does not necessarily disqualify a partner, since an improvement plan can be developed, agreed, and then supported by the United Nations agency (in this case WFP) and this is also seen as important to further the localization agenda. The intention is to understand risk so that the agency is aware and knows what additional mitigations may need to be undertaken while capacity is built.

251. In 2022, following the WFP contribution to piloting and developing the final tool, the Ethics Office and the NGO Unit provided an online orientation session for country offices²⁴⁰ before initiating a field pilot of the assessment tool in select country offices, thereby ensuring practical testing and refinement.²⁴¹ As of October 2023,

²³⁴ KII.

²³⁵ Public goods are defined as “those that are available to all (“nonexcludable”) and that can be enjoyed over and over again by anyone without diminishing the benefits they deliver to others (“nonrival”).”. Source: IMF. 2021. What are global public goods?. See: <https://www.imf.org/en/Publications/fandd/issues/2021/12/Global-Public-Goods-Chin-basics>.

²³⁶ KII.

²³⁷ WFP. 2022. Annual Performance Report 2022.

²³⁸ According to the WFP field-level agreement tracker (Sept 2023), the number of agreements signed with cooperating partners through a field-level agreement memorandum of understanding or letter of understanding reaches a total of 1,703. This number comprises 847 agreements with local NGOs, 538 with international NGOs, 283 with government entities, 16 with UN organizations, and 19 with Red Cross agencies.

²³⁹ 7 KIIs.

²⁴⁰ IASC. 2020. United Nations Implementing Partner PSEA Capacity Assessment – [Harmonized Implementation Tool](#).

²⁴¹ WFP.2020. Protection from Sexual Exploitation and Abuse – Year in Review.

more than 500 WFP focal points and focal points from 176 cooperating partners had received training on the self-assessment phase and on how to develop capacity strengthening. They also provided direct support to staff in country offices. The Ethics Office has also facilitated 17 webinars in multiple languages to over 3000 United Nations and NGO staff.²⁴² WFP expects cooperating partner management staff to support the cooperating partners capacity building efforts.

252. Despite support efforts, the recent rollout of the PSEA assessment posed a significant burden for WFP offices, requiring substantial capacity. Offices were at various stages during evaluation. In some cases – such as in Türkiye – partners in joint ventures detailed support from non-WFP entities under shared plans rather than referencing WFP plans. Respondents viewed the assessment as a mix of success, learning and challenge. Some felt the tool was too broad and received guidance and training late (2023). Nonetheless, many acknowledged the value of assessing all partner aspects, fostering trust in them.²⁴³ The main issue raised in every interview related to the common assessment tool was that WFP at the country level had limited capacity to undertake the assessments and now has limited capacity to support partners in their improvement plans.²⁴⁴ In Nigeria and Mozambique, for instance, PSEA focal points were struggling to undertake the reviews at the pace required. In Mozambique, senior management took the decision to draw in extra support from the country office's gender focal point to expedite reviews, and in some cases, re-do reviews that were not to standard.²⁴⁵

Box 14. Comparative exercise: UNICEF handbook on partner capacity support.

UNICEF updated practical guidance for staff on working with partners on sexual exploitation and abuse prevention and response approaches across UNICEF programming in the UNICEF Programme Implementation Handbook. Approximately 50 percent of the UNICEF global implementing partner portfolio has been assessed, with 5 percent categorized as high risk and about half deemed to be of moderate risk. However, there is an acknowledgment that the system is evolving and is not without its imperfections. A commitment to localization means that a significant portion of civil society organizations (CSOs) involved require support to reduce their risk, meaning UNICEF country offices must include such support in their planning. The 2023 handbook also includes guidance on conducting tailored monitoring visits.

253. In the case of hard-to-access locations where the choice of partner may be limited, the knowledge of partner PSEA capacity is critical. While WFP country offices generally have limited capacity to assess or to support the building of partner PSEA capacity, this is amplified in hard-to-access locations where there may not be opportunities to do in-depth work or verify progress. In northwest Syria, for example, WFP must employ third-party monitors, who are primarily at the activity sites, rather than visit households directly.

254. In some country offices there is evidence of collective learning taking place and examples of where WFP cooperating partners are part of, or leading, the inter-agency PSEA network and coordination meetings, such as in Mozambique or Türkiye. In Nigeria and Pakistan, the country office was able to point to PSEA learning taking place because of proactive “resolution” meetings with cooperating partners following sexual exploitation and abuse cases that had occurred. For Nigeria this allowed the Nigeria country office to improve onboarding of new cooperating partners and to understand better how partners were conducting risk assessments.²⁴⁶ The same cooperating partners in Nigeria said that they received materials from WFP that were “fairly good”, and that WFP shared more guidance than their other international partners.²⁴⁷ In Pakistan local cooperating partners, which were again partners of several United Nations agencies, gave most credit to WFP for PSEA support

255. As part of standard field-level agreements, cooperating partners are agreeing to take preventive measures against sexual exploitation and abuse, investigate allegations and take corrective action. They are also required to report to WFP on PSEA on a weekly or monthly basis depending on the arrangement. However, many cooperating partners explained that they are uncertain on the implications of ²⁴⁸ the contractual responsibilities – that is it

²⁴² Country office stakeholder feedback.

²⁴³ 2 KIIs.

²⁴⁴ KII.

²⁴⁵ 2 KIIs.

²⁴⁶ KII.

²⁴⁷ KII.

²⁴⁸ KII.

unclear to them what the implications are for their contract if they report a sexual exploitation or abuse incident. Another cooperating partner respondent stated that they were unaware that they were required to report case types to WFP, separately from the number of cases. Many cooperating partners also voiced concern about managing the relationship with governments on a topic as sensitive²⁴⁹ as PSEA and requested guidance.²⁵⁰

256. WFP continues to invest in cooperating partner capacities through capacity building initiatives such as the “PSEA at the front-line” project.²⁵¹ It is seeking to increasingly target categories of personnel that have the most direct contact with communities.

257. While WFP has made progress in assessing and understanding cooperating partner capacity on PSEA and putting risk mitigation measures in place, an area of risk that appears not yet fully addressed is that of vendors and financial service providers. In all countries visited, vendors and financial service providers are included in the short cross-cutting issues training and provided with documentation on PSEA obligations. Compliance and partnership teams in all country offices visited also worked closely with PSEA focal points in rolling out the United Nations Implementing Partner Assessment Tool. However, the evaluation team found that WFP procurement, logistics and specialist advisory staff engaging with vendors were not involved in these conversations and do not have the training themselves to work with vendors on identifying and addressing sexual exploitation and abuse risk. The evaluation team did not identify a single example of where PSEA capacity had been a criterion in recruitment for vendors or financial service providers. Although financial service providers have hotlines, which – theoretically – can also be used for sexual exploitation and abuse complaints, no country office raised this with the evaluation team and it is unclear if and how these are validated and monitored. The assumption that non-NGO partners would be as able to understand PSEA obligations as NGO partners appeared to be consistently held based on the absence of additional assessment and analysis. Procurement, supply chain and logistics staff at all levels consider that they have not had the training to be able to engage on this issue and have not had clarification on their specific responsibilities. The evaluation team found it to be a systemic issue across all country offices considered for this evaluation.

“[We in supply chain] have never systematically assessed the risk of SEA before. We assess AFAC [anti-fraud and anti-corruption], risk of conflict of interest, child labour, but never SEA. But it’s an area that needs looking at. Lately we have been involved in many anti-fraud and corruption audits and risk analysis on humanitarian clauses/the tax liabilities and these kinds of things, this has been one area that they haven’t focused on yet.”²⁵²

2.4. EQ4: Is WFP programming delivering on its PSEA commitments?

258. **WFP programming falls short of fulfilling PSEA commitments. Focal points lack resources and confidence, hindering PSEA agenda delivery. PSEA networks are just beginning to mobilize, and integration into organizational tools is incomplete. Under-reporting of sexual exploitation and abuse persists globally, with no cohesive monitoring system across WFP.²⁵³ Staff perceive inefficient handling of reported sexual exploitation and abuse cases despite some improvements. While innovative practices are emerging in certain countries, much remains to be accomplished for comprehensive PSEA implementation.**

2.4.1. EQ4A. Are WFP measures for PSEA effective in generating confidence among personnel?

259. **Finding 23: PSEA focal points express limited confidence, linked to capacity limitations, to implement PSEA-related activities and to achieve PSEA results.**

260. Less than half of PSEA focal points (45 percent) who responded to the survey conducted for this strategic evaluation report that they “feel confident” in what they are doing. Broken down by time spent in the role, those who have less than one year of experience in the focal point role have especially low levels of confidence in their roles. While these trends also appear similar for different levels of seniority, response levels for deputy country director and senior management roles – were low (making up only 5 percent of the overall survey respondents). In terms of the general support afforded to PSEA focal points, less than half of the respondents feel that this support

²⁵⁰ 8 KIIs.

²⁵¹ WFP. APR. 2021.

²⁵² KII.

²⁵³ IASC. 2024. Evolution of Collective IASC Member Culture on Protection Against Sexual Exploitation and Abuse and Sexual Harassment.

is adequate (41 percent).²⁵⁴ See Box 9 in EQ2C for examples of support requested by focal points that could improve their confidence in PSEA measures.

261. In terms of capacity to fulfil their PSEA focal point role, almost half of survey respondents (49 percent) reported spending from one to five hours weekly on their role, followed by those who reported spending less than one hour (38 percent). Almost 60 percent of country directors and deputy country directors expended less than an hour per week on PSEA activities as compared to 10 percent of accountability to affected populations, gender and protection staff. Given the complexity of the subject matter, and the importance of the role, these figures are alarmingly low. In the inter-agency terms of reference for the role,²⁵⁵ the time stipulated is a “minimum of 10 percent of their time to this role (as in internal and inter-agency oriented PSEA focal point”.²⁵⁶ However, it is difficult for many focal points to commit this time – although it should be recognized that some country offices have a number of focal points who defer the bulk of PSEA work to senior focal points or alternates. It should be remembered that the 2023 Executive Director circular represents a step change in commitments and activities. As one area office-level PSEA focal point states:

“The biggest challenge is that we don’t have resources and I don’t have the time to focus on PSEA. I have asked and asked for dedicated PSEA support. [...] There are so many compelling competing priorities.”

262. Many senior managers who are focal points expressed some uncertainty about what was expected of them in the role (see also EQ2C) and the challenge of balancing this with other responsibilities. Some country level senior management still see this as a new role for deputy country directors to have and feel that expectations should be standardized.²⁵⁷

263. Focal points’ knowledge of processes still largely depends on their experience in the role. For example, many focal points were uncertain what the process would be if a report was received but were clear about the imperative to report.

264. **Finding 24: WFP is making important efforts to develop effective indicators and a wider monitoring system for PSEA, although these initiatives have not yet yielded consolidated reporting. This is a broader challenge for WFP monitoring, which contributes to a sense that WFP cannot assess or monitor the extent of sexual exploitation and abuse risk in individual contexts and more generally in delivery models.**

265. The monitoring systems in place for reporting against indicators relating to PSEA is described in EQ2A. As part of that system, as shown in Figure 8 below, the number of countries reporting on protection and accountability to affected populations indicators has increased incrementally since 2019 for all indicators.

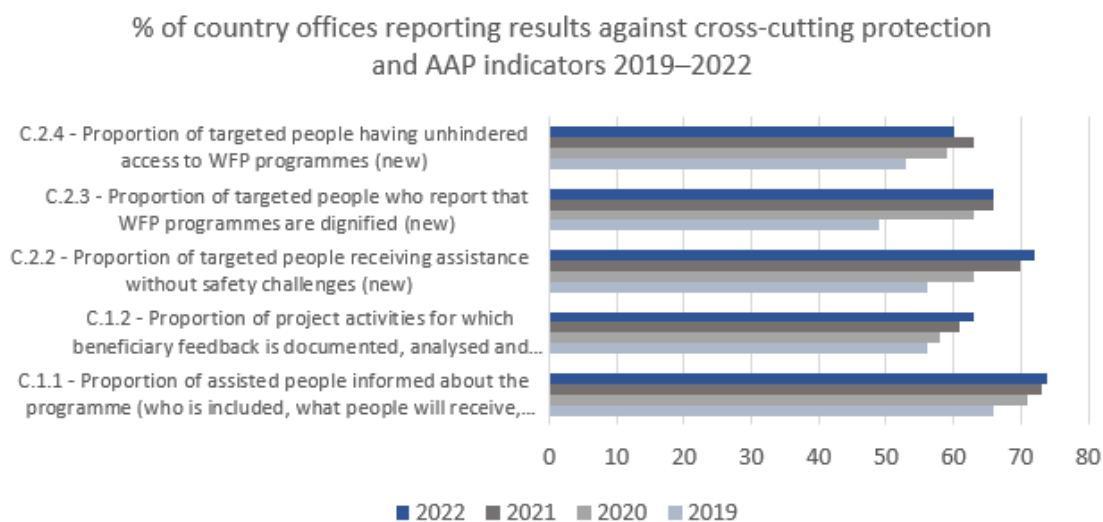
²⁵⁴ A further breakdown of this can be found in Annex 9: focal point PSEA Survey.

²⁵⁵ The WFP PSEA focal point terms of reference template as found in Annex 2 of OED2023/011 does not provide a required time commitment for the PSEA focal point role.

²⁵⁶ PSEA focal point terms of reference, AAP Task Force, September 2020, Inter-Agency Coordination Türkiye.

²⁵⁷ KII.

Figure 8. Distribution of the number of country offices presenting results against cross-cutting protection and accountability to affected populations indicators 2019-2022



Source: CRF annual reports – 2019-2022.

266. The reporting infrastructure makes it difficult to aggregate data. Consequently, currently WFP cannot compare datasets to determine PSEA outcomes in relation to inputs or outputs. For instance, it is not possible to determine how the development of certain types of community feedback mechanism modalities managed by cooperating partners have contributed to an increased number of reported allegations in a country.

267. Ultimately, the monitoring challenges for PSEA are consistent with wider monitoring challenges across WFP – especially regarding reporting on cross-cutting issues. This is evidenced in the WFP Synthesis of Evidence and Lessons on WFP’s Performance Measurement and Monitoring from Centralized and Decentralized Evaluations (2018–2021),²⁵⁸ which concluded that there is:

“desire and need at both the country and corporate levels to expand qualitative data collection, analysis and reporting, especially for cross-cutting issues, in order to support learning and adaptation, indicating that a focus on merely counting beneficiaries will result in ‘hitting the target’ but ‘missing the point’”.²⁵⁹

268. **Finding 25: There are significant opportunities to review underutilized data and integrate PSEA into needs assessments to inform PSEA-responsive programming at the country office level.**

269. Although WFP programmes measure context-related dimensions, these are often aggregated at a national level but not analysed by PSEA focal points and senior management.²⁶⁰ In Nigeria, food security outcome mapping and essential needs assessments, with comprehensive sample sizes, include a question on exposure to sexual exploitation and abuse. The analysis of these data for management decisions remains unclear, while other WFP units do not demand or receive this data analysis. Research, assessment and monitoring (RAM) staff in Mozambique and Johannesburg confirm PSEA modules in survey tools, querying respondents about exchanging sex or other goods for humanitarian aid.

270. Feedback from RAM units in other country offices such as Mozambique, as well as the regional bureau in Johannesburg, confirmed that a new module on PSEA-related experience was being trialled in survey forms.²⁶¹ The forms include a question that asks community members whether they “have seen exchange of goods or services

²⁵⁸ As the synthesis report only covers 2018-2021, it is important to note that PSEA cross-cutting indicators in the CRF were only introduced in 2022, and 2023 is the first year 2023 was reporting on these indicators.

²⁵⁹ WFP. 2023. Synthesis of Evidence and Lessons on WFP’s Performance Measurement and Monitoring from Centralized and Decentralized Evaluations (2018–2021). Original reference: WFP. 2017. Operation Evaluations Series: Regional Synthesis 2013–2017, Middle East, North Africa, Central Asia and Eastern Europe Region. Report number OEV/2017/008. J. Betts & B. Díaz. Washington DC and Rome, KonTerra and WFP.

²⁶⁰ 2 KIIs.

²⁶¹ 2 KIIs.

for sex". However, RAM staff in multiple countries confirmed that analysis of this dataset was not undertaken or requested for country offices, regional bureaux and headquarters decision making purposes.²⁶² The reporting infrastructure for PSEA is undermined by a lack of incentives to compile and digest pre-existing data pertinent to the measurement of PSEA risk (see Box 15).

Box 15: Opportunity for obtaining significantly useful PSEA prevalence and incidence data in Nigeria

The food security outcome mapping assessments for Nigeria across 2021 and 2022 capture evidence on whether a respondent "is aware of anyone in their community exchanging goods or services for sex with an aid worker" (in this instance, a respondent is a member of the general population and not necessarily a WFP beneficiary). The surveys are statistically representative, with a randomized sample size of n=2000. The results of the survey show a consistent 2 percent of respondents confirming this to be the case for Borno State. Given that the population of Borno State is 5.86 million persons (2023), the survey suggests that approximately 120,000 persons are aware of alleged sexual exploitation and abuse incidents. While this high number potential offers a data stream to work from, no analysis of associated locations or follow-up questions were undertaken with respondents, suggesting a missed opportunity for understanding sexual exploitation and abuse risk and incident contexts.

The survey question does not differentiate between incidence and prevalence logic, suggesting that survey respondents may be remembering incidents over the course of a year, or multiple years, or on a lifetime basis. Nevertheless, given that the WFP Nigeria country office is encountering sexual exploitation and abuse incidents of less than 5–10 per year (based on anecdotal key informant interview feedback), the figure from the mapping assessments is a red flag in terms of potential order of magnitude of the problem.

271. Sexual exploitation and abuse risk is not currently an objective of needs assessments. There are gender objectives, but sexual exploitation and abuse risk is not explicitly part of this. The Cluster Protection Analysis Framework and associated tools, developed by USAID and the International Rescue Committee (IRC), and sometimes used by WFP staff, also does not explicitly address PSEA expectations other than describing examples of sexual assault and gender-based violence. Overall, the needs assessments analyse vulnerability and need, informing programme design – but not from a detailed PSEA perspective:

"There is no policy framework to anchor protection/PSEA to assessment or consideration of needs or vulnerability."²⁶³

272. Several senior managers at country and regional levels stated that PSEA is also not seen as an operational responsibility in re-targeting exercises where "the pressure on assurance is literally on the commodity and the cash not upon the individual receiving (or not receiving) these items".²⁶⁴ The evaluation team was not able to identify examples where sexual exploitation and abuse risks had been used to improve prevention or to advocate for additional PSEA resources. Several country stakeholders indicated that the impending funding crisis within WFP is happening too quickly to allow safe, confidential consultations on this increasing risk.²⁶⁵

273. **Finding 26: Staff across WFP perceive that investigations on sexual exploitation and abuse remain protracted, despite statistics indicating faster turnaround times in sexual exploitation and abuse investigations. Managers and focal points in all countries reviewed professed a lack of awareness regarding WFP progress in response to sexual exploitation and abuse complaints and on how the commitments to a victim-centred approach is, and should be, applied. How historical cases were handled is still narrated by staff as the norm. This all contributes to a lack of trust in positive change. Managers say that the – unintended – consequence of the imperative to maintain confidentiality during investigations into individual cases means that they do not receive information related to potential PSEA system gaps and sexual exploitation and abuse risk in real time and are not able therefore to take relevant action to minimize risk and take preventative action to mitigate the risk of new cases occurring.**

²⁶² KII.

²⁶³ KII.

²⁶⁴ KII.

²⁶⁵ Ibid.

274. Senior management at country and regional offices were asked how sexual exploitation and abuse complaints, or rumours of sexual exploitation and abuse, prompted adaptations to programme design or mitigation to reduce such risk. While not directly tied to programme design adaptations, the Bangladesh country office reported seeing a decline in PSEA activity and awareness of PSEA during COVID-19. To address this, the country office collaborated with headquarters, leading to a significant uptake in PSEA awareness-raising materials. In collaboration with IOM and Translators without Borders, 34 different types of materials were developed, which have now also been translated into Bangla and Rohingya.²⁶⁶

275. However, beyond this, no examples of programme design adaptation or mitigation to reduce sexual exploitation and abuse risk were provided. When asked why not, the evaluation team was routinely informed by WFP staff that once a complaint is made, confidentiality of the process would prevent discussion of any such identified risk. A senior member of headquarters staff confirmed that this was the case saying that “internally we do have conversations but mostly about the consequence of cases [for the individuals concerned] not about the [implications for] operational response. [Once the investigation is over] it is an HR issue.”²⁶⁷ Regional bureau staff in one regional bureau stated that in terms of feedback about investigative processes or the scenarios in which sexual exploitation and abuse incidents occurred, they “see little coming to [them] – either from country offices or from OIGI or annual reports” with no corresponding analysis of reporting or risk levels.²⁶⁸ This was echoed by a stakeholder in a different regional bureau who said that “in terms of contextual feedback – post-investigation – we don’t get anything”²⁶⁹ and this was repeated in the majority of country offices visited.²⁷⁰ This is, of course, related to the strict confidentiality standards under which OIGI operates, meaning that feedback to offices continues to be provided by OIGI on a strict need-to-know basis. OIGI also has protocols for sharing systemic issues, which it identifies during investigations with management, and it does so when appropriate. This would appear to be excellent practice, however, no examples of this were provided to the evaluation team.

276. Within the context of the effectiveness of WFP PSEA, staff at all levels provided feedback about their perceptions of how WFP responds to sexual exploitation and abuse allegations and how this has implications for their confidence in the wider WFP PSEA system.²⁷¹ Across all regions and headquarters, staff provided feedback that they receive limited communication on progress being made to improve investigation systems and mechanisms, to increase capacity for investigations, and to prioritize sexual exploitation and abuse and sexual harassment (SEAH) investigations. They are not aware that there has been measured, positive, change in timeliness of sexual exploitation and abuse investigations.

277. Many staff report their experience that victims and country management also receive limited feedback as part of case management and perceive that victims are not supported appropriately.²⁷² In several country contexts, the cases described to the evaluation team as examples of why staff lacked confidence in the system were historical or related to sexual harassment, and were therefore outdated or unrelated. While the evaluation cannot make an evaluative judgement on the progress in investigations and case management, the perceptions described here are important to this evaluation as they speak to trust, culture, a victim-centred approach and risk management.²⁷³

278. Such concerns around confidence in the investigative system do not fully correlate with broader perceptions gathered by the WFP global staff surveys (2018 and 2021). These surveys indicate that most staff believe WFP will protect them if they “speak out”, and a larger proportion think that the accountability system is working. For example, 58 percent of staff think that “WFP [will] protect me if I speak out about something which is not being done right”; and 67 percent think that “WFP employees at all levels are held accountable for unethical behaviour and misconduct”.²⁷⁴ However, as the question does not solely relate to sexual exploitation and abuse or SEAH, it is not possible to understand to what extent staff were considering SEAH when answering this.

²⁶⁶ KII.

²⁶⁷ KII.

²⁶⁸ KII.

²⁶⁹ KII.

²⁷⁰ 2 KIIs.

²⁷¹ KII.

²⁷² KII.

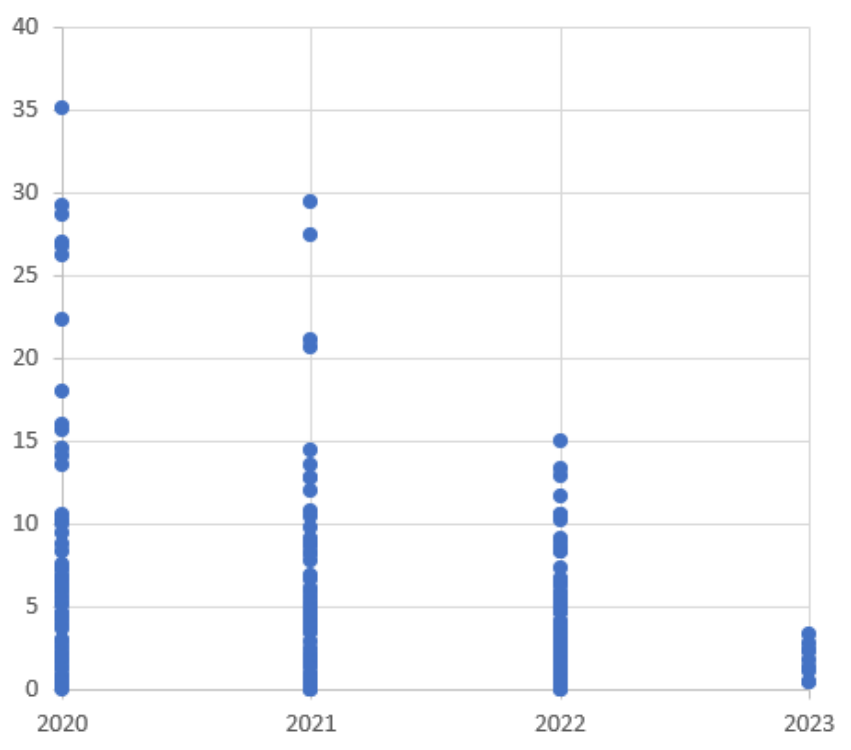
²⁷³ 2 KIIs.

²⁷⁴ WFP. 2021. Global staff survey results.

279. Public documents show that investments are being made by WFP to increase the efficiency of investigation timeframes. At the headquarters level, the annual report of the Inspector General provides detail on numbers of investigations resolved and it is possible to understand how the numbers of complaints are increasing over time while investigation timelines overall are reducing. A review of investigative timeframes (see Figure 9 below) since 2020 confirms that there has been a decline in turnaround times for sexual exploitation and abuse investigations.²⁷⁵ Staff may also access the data presented at the UN i-Tracker, which provides additional information.²⁷⁶

280. A limiting factor in building staff confidence relates to how communications of progress are made. For example, the reports on sexual exploitation and abuse investigation outcomes do not contain details on the number of substantiated sexual exploitation and abuse cases that have resulted in disciplinary actions. In 2022, the report on disciplinary matters presented two sexual exploitation and abuse cases (out of 89 allegations) and their outcomes, but it is not possible to understand the proportion of substantiated cases that resulted in disciplinary actions in the same year. Furthermore, annual reports of the Inspector General do not provide details on substantiated cases, as disciplinary actions are not decided or taken by OIGI but by the Human Resources Department.

Figure 9. Sexual exploitation and abuse investigations turn-around time (in months) for substantiated cases 2020–2023



Source: OIGI internal data.

281. **Finding 27: Efforts being made to increase the overall safety and protection of beneficiaries at the field level, in parallel to PSEA-specific efforts, may be having unintended effects; both positive and negative on PSEA outcomes. This may also be the case for efforts to address gender equality and women’s empowerment. However, as they are not monitored through a PSEA lens the impact and the learning is not captured.**

282. Several positive examples were identified where country offices are putting in place key protective measures to address gender-based violence that indirectly contribute to PSEA outcomes. For example, the Ecuador

²⁷⁵ Obtained directly from OIGI.

²⁷⁶ United Nations. Data on Allegations: [UN System-wide](#).

country office has included specific activities within their Binational Project, aimed at reducing the time women and girls walk to fetch water, so that they reduce their potential exposure to sexual violence.²⁷⁷ In Pakistan gender-related aspects including SEA prevention were ensured in the establishment of the WFP Benazir Nashonuma Programme facilitation centres and food distribution sites, and addressed through sensitization and training of the cooperating partners, community outreach workers and women health workers and through the engagement of the local administration. Also, in Pakistan, at the provincial level, the security officer is also the PSEA alternate and WFP employs women security staff to ensure that gender-aware and sensitive security aspects are adopted by cooperating partners at distribution sites to deter gender-based violence on both women staff and beneficiaries.²⁷⁸ Many of these efforts and similar measures are already recommended by a global research programme, Empowered Aid, which is supported by the Ethics Office. Among Empowered Aid's recommendations is the importance of women staff at distribution sites and visible in all community-facing programming.²⁷⁹ Country offices were largely not aware of the Empowered Aid work.

283. There are also examples where activity to mainstream gender equity and to promote women's economic empowerment may have unintended negative consequences, potentially exposing women to sexual exploitation and abuse. For example, desk reviews,²⁸⁰ country office and regional bureaux interviewees²⁸¹ described school feeding programmes where the modality is to provide cash to women who farm or cook food at their homes and bring it to the school.²⁸² The contracting of these women (not always directly by WFP, but often by intermediary organizations) is a strategy intended to contribute to women's economic empowerment and is described as such in the programme documents. WFP staff were not able to say whether safeguards had been put in place regarding selection processes of the women, the retention of these women, and sexual exploitation and abuse.²⁸³ In interviews it was clear that these women were sometimes perceived as secondary beneficiaries of the programme and sometimes as vendors. It had not been considered whether they were vulnerable to sexual exploitation and abuse. In other middle income country contexts, such as Türkiye (see Finding 20), there is a desire to ensure that women and girl refugees placed in private sector businesses through programmes with the Government are well represented among beneficiaries of this programme. Awareness-raising on the conduct expected of all engaged in the programme takes place as part of induction programmes with trainees, and a helpline is available, but the complexity of the accountability chain and the number and type of actors involved mean that WFP cannot be certain that they would know about complaints.²⁸⁴

284. Analysis of the inclusion of sexual exploitation and abuse-specific measures in protection plans and strategies at the country office level shows that, although PSEA is mentioned in most recent documents, the mention will not be a substantive one and specific activities or sexual exploitation and abuse action are not mainstreamed in these plans and strategies. For example, in Pakistan, the Gender, Protection and Disability Inclusion Strategy (2022 revised version) mentions that sexual exploitation and abuse needs to be systematically addressed (Objective 2) through WFP operational plans (country strategic plan); however, there are insufficient sexual exploitation and abuse-specific institutional or programme mainstreaming arrangements. This is, however, something that staff in Pakistan wish to prioritize once they have additional resources and capacity.

2.4.2. EQ4B. How do WFP personnel derive confidence that beneficiaries are aware of and are making use of WFP procedures on PSEA?

285. Finding 28: The increase in the number of sexual exploitation and abuse reports in the last five years has not grown either in step with expansion of WFP operations, or with reports received by benchmarked organizations.

286. An analysis of publicly available data on reported sexual exploitation and abuse complaints received about WFP staff and partners between 2017 and 2023 (to date) is provided in Figure 10 below.²⁸⁵ This shows that the number of cases of sexual exploitation and abuse reported to WFP has remained relatively constant, and low since

²⁷⁷ WFP. 2021. Ecuador Country Annual Report.

²⁷⁸ KII.

²⁷⁹ The Global Women's Institute. [Empowered Aid](#).

²⁸⁰ WFP. 2021. Evaluation of WFP's Policy on Building Resilience for Food Security and Nutrition.

²⁸¹ KII.

²⁸² KII.

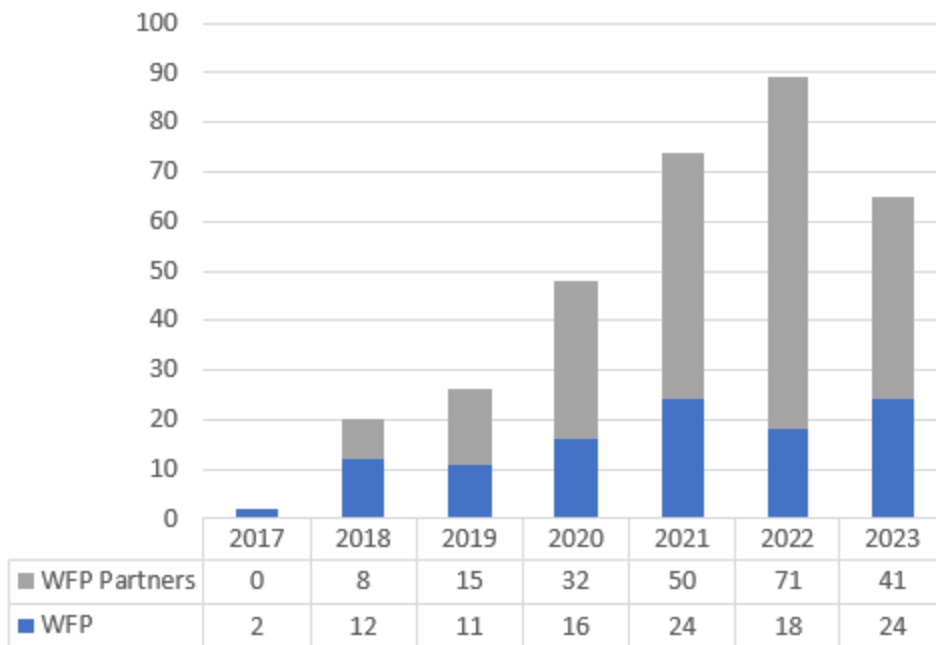
²⁸³ KII.

²⁸⁴ KII.

²⁸⁵ Allegations may involve more than one victim and/or more than one alleged perpetrator.

2018, whereas the number of cases reported by cooperating partners has steadily increased since the obligation to clarify such reporting requirements and distinguish those related to partners was clarified in March 2018.²⁸⁶ Despite the gradual increase however, partner reports are also low compared to the operational footprint that WFP operations occupy.

Figure 10. Sexual exploitation and abuse allegations against WFP staff and WFP partners (2017–2023)



Source: UN i-Tracker.

287. The broader picture of comparative data with other agencies also shows a low incidence of reporting, but the extent of the gap is surprising in terms of the relative organizational footprint of WFP, expenditure and the fact that food distributions are frequently reported in many contexts to be the “highest source of SEA”.²⁸⁷

288. For WFP it would be reasonable to expect to see much higher numbers of reports of sexual exploitation and abuse, particularly in recent years as WFP expenditure grew by 53 percent between 2019 and 2022.²⁸⁸ Figure 10 shows that in 2019 WFP had 3.4 reports per USD billion expended, compared with 11.6 and 56.3 for UNICEF and UNHCR respectively. In 2022, WFP had more than a doubling of reports to 7.67 per USD billion expended. The slight reporting increment within WFP may be associated with increased focus and momentum across WFP on PSEA from 2018 onwards as well as with increased awareness-raising by the humanitarian and development sector and increased donor requirements on reporting. Consequently, WFP is now comparable to the UNICEF figure of 8.02 reports per USD billion, but still receives significantly fewer reports than the UNHCR 18.23 reports per USD billion in 2022. Some WFP staff have suggested that could be attributed to stronger awareness and procedures in WFP since 2018, as well as differences in caseload, however under-reporting remains a concern across the sector with agencies not seeing low or zero reports as representing a problem.²⁸⁹

289. WFP headquarters staff have also suggested that the lower number of reports may be due to WFP not being a “protection agency” with a commensurate number of staff who have a protection background and can therefore oversee protection-driven programming, which will engender confidence in communities to report.²⁹⁰

²⁸⁶ UN. 2018. United Nations Protocol on Allegations of Sexual Exploitation and Abuse involving Implementing Partners. [UN Protocol on SEA Allegations involving Implementing Partners - English_Final.pdf](#).

²⁸⁷The Global Women’s Institute. [Uganda](#).

²⁸⁸ United Nations. 2019-2022. UN i-Tracker and WFP annual reports.

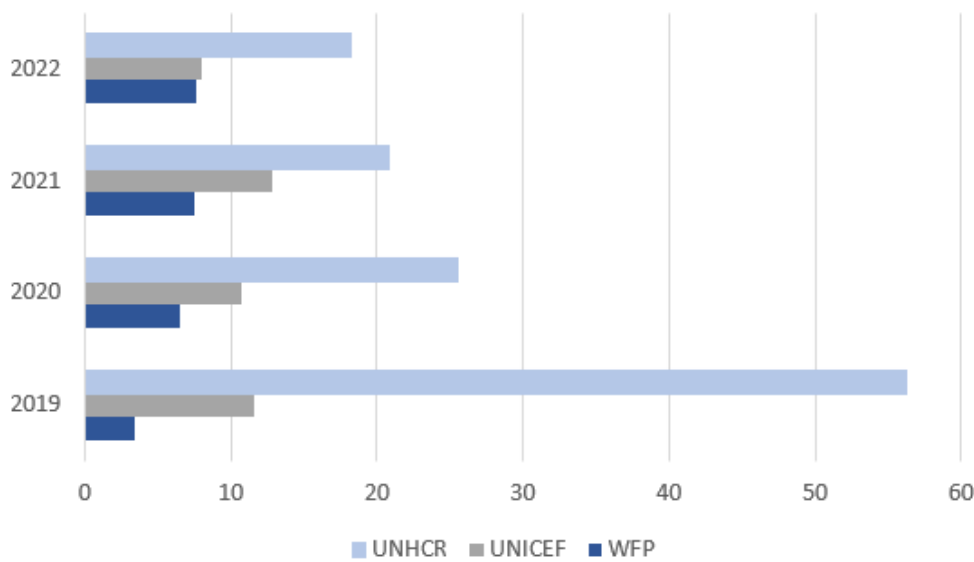
²⁸⁹ IASC.2022. Champion on PSEAH report (forthcoming).

²⁹⁰ KIIs and written comments received on draft evaluation report.

While this may or may not be a factor, it does not remove any responsibility on the part of WFP to observe warning signs, assess risk, mitigate risk, and monitor the effectiveness of risk mitigation strategies. If WFP routinely has an absence of such capacities among staff – and is aware of that – the responsibility to put such measures in place is increased and the absence of such responsibilities becomes a systemic risk factor unmitigated by protection staff. We have detailed the case of South Sudan where the country office has appointed the only full time PSEA focal point at the country office level for these, and many other reasons, and named this as a good practice (see Box 7).

“Do I feel confident? No, not at all. Not because we are better or worse than UNHCR or World Health Organization (WHO), but we are bigger, because our footprint is bigger. Our operational footprint is bigger and less government-orientated.”²⁹¹

Figure 11. Number of sexual exploitation and abuse incidents per USD billion expenditure of operations²⁹²



Source: UN i-Tracker.

290. WFP has increased capacity within investigations in 2022 (not specific to sexual exploitation and abuse) and any sexual exploitation and abuse or sexual harassment case is prioritized within OIGI.³³⁷ This means that investigation times for SEAH cases have reduced but potentially at the cost of non-SEAH cases being deprioritized. Interviews with WFP headquarters staff suggest that an acknowledged SEAH backlog is being addressed. However, as complaints of all types continue to rise in line with the increased WFP operational footprint in the last five years, the fact that the budget for investigations is to be budget neutral in 2024 means that progress may slow again.³³⁸ Were there to be a sharp increase in sexual exploitation and abuse risk and subsequent sexual exploitation and abuse reports, due to factors such as budget reductions and retargeting exercises, the capacity to ensure investigations are timely might not be in place.

291. **Finding 29: Staff express doubts that the information they receive from reporting systems is representative of sexual exploitation and abuse occurrence.**

292. Country directors, deputy country directors and focal points, or alternate focal points did not know the numbers or trends of PSEA incidents in their country office and no country management team routinely discussed these trends or patterns to understand why reports might be increasing or decreasing. This was also the case for technical staff working in cash-based transfers or school feeding. This is ascribed to multiple reporting channels, some of which bypass or are duplicated at the subnational office or the country office to create: a complex

²⁹¹ KII.

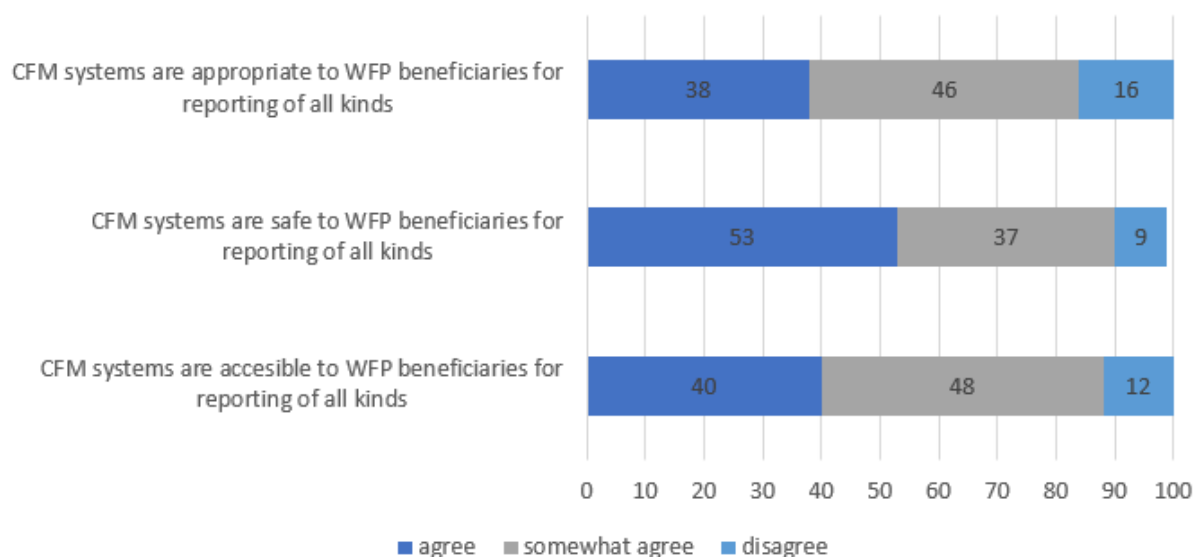
²⁹² Reporting numbers are for organization & partners.

reporting pattern; contextual barriers to reporting; and staff being unable to engage in analysis of reporting data due to competing priorities. Stated barriers to analysis include a “lack of experience and knowledge” and the “challenges of multiple reporting channels” that require “an archaeological review to pull out the undercounting or over-counting”,²⁹³ as well as the sense that “having a lot of reports can actually be seen as concerning”.²⁹⁴ A small number of staff at the country office level consider that it is “impossible that nothing is happening” that “it’s hard to tell” and they are “are very worried about this”.²⁹⁵

293. **Finding 30: Community feedback mechanisms and community engagement PSEA activities are in place across country offices, although these systems are not creating significant confidence among staff that they are effectively facilitating sexual exploitation and abuse reports.**

294. The status of the community feedback mechanism and community engagement systems in place are delineated in EQ2B. PSEA focal points responding to the survey provided mixed feedback (see Annex 9) in terms of the accessibility, safety and appropriateness of reporting channels (see Figure 12). Focal points identified several gaps in the reporting channels that may affect perceptions of the use and safety of reporting mechanisms, including a lack of anonymous channels (such as the suggestion boxes placed in public spaces), a lack of follow-up mechanisms, and a lack of final accountability or communication of investigation outcomes.²⁹⁶

Figure 12: Perceptions of PSEA focal points regarding appropriateness, safety and accessibility of community feedback mechanism systems in percentages (total number of respondents: n=182)



Source: PSEA focal points survey.

295. Regarding key reporting channels, the community engagement and community feedback mechanism survey 2022 data show that in 2022 the most common reporting channels among the country offices consulted in the survey were hotlines (90 percent) (often partially or wholly funded by WFP), followed by staff and monitors (73 percent). The evaluation team was informed of several hotlines that were limited to office hours during weekdays only, were not free to call, or were understaffed, with limited multilingual capacity.²⁹⁷ While ensuring accessibility and localized relevance, the hotline in Mozambique demonstrated a challenge in terms of gender equitable access – that is, most complaints about all issues came from adult men (reflecting societal norms about heads of household and phone ownership). The Mozambique country office recognizes these barriers and has taken steps and has sought to mitigate by increased helpdesk and suggestion box presence at the community

²⁹³ 2 KIIs.
²⁹⁴ KII.
²⁹⁵ 2 KIIs.
²⁹⁶ Ibid.
²⁹⁷ 4 KIIs.

level.²⁹⁸ Respondents noted that resolution of complaints can be challenging and complex given a lack of guidance and protocols for perpetrators who may hold local positions of authority. This experience was said to contribute to a risk of community disillusionment in the PSEA system and hotline.²⁹⁹ It was also confirmed that even in the more dominant traffic relating to fraud and corruption there is a general sense of despondency among callers about the complaint being resolved.³⁰⁰ The issue of hotlines not being appropriate as a single or highly promoted route for sexual exploitation and abuse reporting also arose in Nigeria³⁰¹ and Zimbabwe, with the former demonstrating technical faults, while the latter demonstrated that only 1-2 percent (average over multiple years) of calls were regarding gender and protection issues.³⁰² As one country director maintained, “we specifically trained the telephone hotline managers to be able to bring out the issue with callers. If you don’t do that reports won’t get captured.”³⁰³

296. On accessibility, focal points noted higher barriers for women and persons with disabilities in accessing the community feedback mechanism systems because of potential stigmatization and already limited empowerment, as well as challenges in the willingness of community members to report sexual exploitation and abuse issues due to fear of reprisals, not believing in the efficiency of the system, or not recognizing the importance of reporting sexual exploitation and abuse. There are also practical challenges for some groups accessing community feedback mechanisms. For example, in Pakistan the community feedback mechanism is a hotline that is not free to call and is staffed only during working hours. However, a 2022 WFP Pakistan protection and gender analysis noted that “households seem to have at least one phone which is kept with the male members”.³⁰⁴ The evaluation team spoke to two groups of women in Pakistan as well as clients of partner agencies (in total 21 women), conducted interviews with cooperating partners and WFP staff, and convened a focus group of WFP staff. All agreed that only a very few of the women and girls who might be vulnerable to sexual exploitation and abuse would have access to a mobile phone.

297. The appropriateness of community feedback mechanisms as a reporting mechanism received the lowest levels of positive ratings from focal points, particularly the hotlines or any other reporting mechanism that is not primarily based on in-person access. This is a particular challenge in hard-to-access contexts.

298. The community feedback mechanism model’s sensitivity and responsiveness to receive sexual exploitation and abuse allegations have also been questioned by other staff working closely on these systems at the headquarters level. A respondent at headquarters stated that complaints were very low given an “organizational structure that is not mature yet” and despite WFP working in “some of the most complicated and dangerous operations on the planet”.³⁰⁵ Another senior management respondent at headquarters level confirmed that the sexual exploitation and abuse reporting is “overcomplicated, generally” and that there are many “opportunities for confidentiality to be breached” – all of which serves to undermine staff confidence that beneficiaries are safely accessing sexual exploitation and abuse reporting channels.”³⁰⁶ This was further supported by a senior WFP manager, who stated that a community feedback mechanism is expensive and there would not be fully established community feedback mechanisms tailored for sexual exploitation and abuse complaints. Therefore, it would be important for managers at regional and country levels to assess whether current community feedback mechanisms were being set up properly to receive “sensitive” complaints on the basis that they would then be able to respond effectively to any form of complaint coming in.

299. These findings echo those in the 2021 IASC External Review on PSEA. The review found that a key element in overcoming the barriers victims have in reporting is for agencies to build trust in the reporting systems by demonstrating to women and girls particularly, over time, that reporting systems work. The IASC review also found that if agency staff, particularly women, lack confidence in their own organization’s PSEA mechanisms, they may be reluctant to advocate for victims to report.³⁰⁷

²⁹⁸ Country office stakeholder feedback.

²⁹⁹ KII.

³⁰⁰ KII.

³⁰¹ KII.

³⁰² WFP. 2020; 2021; 2022. M&E updates – Hotline Reports.

³⁰³ KII.

³⁰⁴ Sukkur Field Visit. 2022. Brief Report on Protection, AAP and Inclusion.

³⁰⁵ KII.

³⁰⁶ KII.

³⁰⁷ IASC. 2021. External review global report. [PSEAH](#).

300. All contexts visited had examples of awareness-raising materials, some WFP-specific and some inter-agency. These materials were inconsistently displayed across offices and operational locations. Materials include those educating beneficiaries about their right to receive a free-of-charge type of assistance and their right to report any misconduct experienced by a member of WFP personnel or cooperating partner. Posters, leaflets, flyers, radio ads and informative sessions include contact details of the reporting channel and encourage beneficiaries to use it. WFP has invested primarily in actions addressing sexual misconduct such as the 'Speak up' awareness-raising initiative³⁰⁸ and the 'Together we say NO' project.³⁰⁹

301. Several country offices went beyond the more common PSEA poster campaign³¹⁰ and have conducted information sessions, sensitization activities and awareness-raising campaigns based on the stock of materials provided by the Ethics Office, but had not undertaken more substantive participatory community education.³¹¹ Research shows how pivotal the engagement of communities is to designing programmes with a victim-centred approach in order to ensure that survivors feel confident and willing when reporting misconduct.³¹² Despite a small number of country offices having undertaken assessments to understand the preferences of beneficiaries on the type of communication channels,³¹³ there is limited evidence that community members participate in the design of the community feedback mechanisms. For example, in Haiti, the WFP CSPE Haiti Evaluation Report from 2023³¹⁴ states that, although WFP had undertaken community engagement on PSEA, the evaluation found significant gaps in awareness, utilization and integration of beneficiary feedback generally. The report highlighted the need to strengthening community engagement further.

302. Other examples include a programme officer working in a regional bureau who explained that "we don't do the awareness-raising in most contexts" and that under-reporting is "a result of communities generally being unaware of their rights and of relevant reporting systems".³¹⁵ Another key informant from a field office stated that there is a challenge regarding the topic of PSEA being "too confrontational", and that the subject matter was treated "informally" as a result.³¹⁶ Key informants from both UNICEF and UNHCR confirmed that this was a sector-wide issue, given that communities and staff who are often closely connected to communities consider matters concerning PSEA to be highly sensitive and sometimes culturally taboo. Staff in country offices visited confirmed that, as a result, community-level engagement on PSEA is often watered-down. Conversely staff in a sub-office visited, as well as focus groups of women consulted in the same location, concurred that WFP may be being "too sensitive" given the level of risk that existed. Both groups in this specific location recommended that WFP needed to invest in more conversations about sexual exploitation and abuse.

303. More broadly, a review of community engagement plans and associated approaches, as well as feedback from key informants at the country office level, showed that training and community awareness-raising were primarily predicated around one-way provision of knowledge rather than co-learning approaches framed around social and behaviour change communication (see Box 16 for promising practice in UNICEF). This issue is part of wider underappreciation of the PSEA risk at the country office level among WFP and partners. Recent research has demonstrated that identification of the contextual barriers for reporting sexual exploitation and abuse is critical.³¹⁷ An appreciation of social and gender norms, wider stigmatization norms, imbalances of power and preferences for community resolutions is key to ensuring context-specific approaches to awareness-raising and community engagement, and for the prevention of sexual exploitation and abuse.³¹⁸

³⁰⁸ WFP. 2021. Annual Performance Report.

³⁰⁹ WFP. 2022. Annual Performance Report.

³¹⁰ All studied countries had developed a PSEA poster containing information about the phone number/WhatsApp any other reporting channels, the type of conduct not accepted and the free nature of the assistance received.

³¹¹ Türkiye. Gender Action Plan; Mozambique. Community Awareness guidance; Zimbabwe. 2022 Annual Report; Bangladesh. Capacity development of PSEA training.

³¹² UKAid. 2021. Protection is possible. How an innovative operating model strengthened safeguarding for the Girls' Education Challenge. RSH.

https://girlseducationchallenge.org/media/ftvixa5u/protection_is_possible_report_final.pdf.

³¹³ Ecuador CSN; Zimbabwe ACR 2022; Bangladesh. IOM Survey.

³¹⁴ WFP. 2023. Country Strategic Plan: Haiti– Evaluation Report – final unedited as of 31 March 2023.

³¹⁵ KII.

³¹⁶ KII.

³¹⁷ Oxfam. 2020. Factors Influencing Misconduct Reporting: A meta-analysis. See: <https://policy-practice.oxfam.org/resources/factors-influencing-misconduct-reporting-a-meta-analysis-621022/>.

³¹⁸ Ibid.

Box 16. Example of drivers undertaking a role in community engagement

Key informants from UNICEF in Mozambique provided details of an innovative practice being tested in northwest Mozambique. This practice entails training of private sector vendors (drivers) on PSEA community engagement practices. This practice facilitates drivers double-hatting as community engagement staff. The advantage of this approach recognizes both a “masculinities” perspective (in that most drivers are men) and a community-level sensitivity in that a driver is “a local man speaking to local men” on matters relating to PSEA. This approach, which is soon to be scaled out across UNICEF Mozambique, recognizes that community-sensitive approaches on PSEA are ideally undertaken by personnel relatively familiar with the communities that are being engaged with.³¹⁹

304. **Finding 31: Understanding of the implications of the victim-centred approach commitment is not yet embedded uniformly within WFP, even within the focal point group.**

305. The UN i-Tracker³²⁰ shows that in the period 2017-2022 a total of 259 allegations were reported by WFP and its partners (see Figure 10). In the same period, only in 16 percent of WFP allegations and in 25 percent of WFP implementing partners' allegations was any form of assistance able to be rendered.³²¹ For the remainder of incidents, victims were either not reachable or declined support.³²² WFP has not reported any analysis on the data, and lessons related to access to support for the victims have not been reported back to the staff involved. Confirming this, two respondents of the focal point survey said that they needed “more training” and “continued mentoring” on assistance to victims.³²³

306. WFP has not yet provided readily available corporate guidance on the application of either victim assistance or broader victim-centred approach principles. Therefore, although all country offices have identified locally established victim referral pathways, victim assistance and a victim-centred approach have not been consistently integrated into case management tools such as standard operating procedures, intake interview guidelines and in-country case reporting systems. Several of the focal points interviewed understood sexual exploitation and abuse referral pathways as equivalent to “gender-based violence referral pathways”, not expressing an understanding that sexual exploitation and abuse brings with it potential additional commitments related to rights and to support needs (for example legal or relocation) than might be available even in an ideal gender-based violence referral pathway. They also were not aware that sexual exploitation and abuse cases might require additional handling regarding additional support and stakeholder engagement internally and externally to WFP.

307. Focal points (as well as senior management more generally) also raised concerns regarding the degree to which a victim-centred approach was currently feasible at the country office level. For example, focal points note that victims are simply “passed to the PSEA network to manage the rest”, or that “going any further than referral or providing food is ambitious”.³²⁴ Other staff were more vocal, stating, “we don't even know our responsibilities on a victim-centred approach for sexual harassment cases”, that WFP “can't pay for a victim-centred approach” or – factually – that “we orient staff that we are not a response agency and point towards services”.³²⁵ A small number of experienced focal points were, however, able to articulate challenging questions regarding how to proceed in relation to unwanted psychosocial support, how long support is provided for as well as the type of modality: “We

³¹⁹ KII.

³²⁰ This evaluation team has relied on data publicly available at the United Nations i-Tracker only. See the United Nations System-wide data on allegations: <https://www.un.org/preventing-sexual-exploitation-and-abuse/content/data-allegations-un-system-wide>.

³²¹ The term “assistance rendered” is used in the United Nations i-Tracker. The United Nations database refers to the United Nations Glossary on Sexual Exploitation and Abuse. Thematic Glossary of current terminology related to Sexual Exploitation and Abuse (SEA) in the context of the United Nations. Second Edition. Victim's assistance is defined as: “assistance and support for medical, psychosocial, legal and other services to be provided to a complainant, a victim or a child born as a result of sexual exploitation and abuse as defined under A/RES/62/214. For the humanitarian sector, including United Nations Agencies, Funds and Programmes, the provision of assistance to victims of SEA does not require individuals to go through an administrative process to be eligible for services.”

³²² Ibid.

³²³ See Annex 9.

³²⁴ 2 KIIs.

³²⁵ 3 KIIs.

provide food? Or it could be cash?"; "A taxi ride to the emergency room, a PEP kit, or a 'whole of life commitment'?"³²⁶

308. At the country office level, examples of concerns and challenges on sexual exploitation and abuse case management³²⁷ were presented, which interviewees in every country visited reported undermined staff confidence in the wider WFP PSEA approach. These include: (i) anecdotal evidence from various country reviews that showed a breach of confidentiality during the report or referral of sexual exploitation and abuse and sexual harassment victims; (ii) inconsistency on the application of the do no harm approach³²⁸ and limited training or capacities in the field to handle cases with children;³²⁹ (iii) restricted follow-up on victims' referrals and assistance shared with the staff; and (iv) limited guidance and training on case referral and assistance to the staff in the field. Interviews with headquarters also indicated that there was a need for more clarity on the role of the focal point and the country office and a common understanding on the separation of case management from the role of investigation.³³⁰ As case management is not part of the scope of the evaluation, the evaluation team can only clearly indicate this collective concern, along with the implication for the commitment of WFP to a victim-centred approach and for wider staff confidence in the WFP PSEA system.

2.4.3. EQ4C. To what extent is zero tolerance on inaction to sexual exploitation and abuse evident in design and operational delivery?

309. **Finding 32: Although zero tolerance to sexual exploitation and abuse is widely and regularly reiterated through training and compliance guidelines, few staff, other than focal points and those working on protection, gender, or accountability to affected populations, were able to explain how their responsibilities aligned with it beyond reporting, whose channels were widely known. Zero tolerance to inaction is a relatively new concept for WFP and the evaluation found that the implications this commitment has on protection, prevention and reporting are not yet clear to staff.**

310. All staff interviewed are aware of the existence of the zero tolerance principle and of the importance of this principle to WFP, and this was the most frequently quoted message of the "tone from the top".³³¹ All staff interviewed for the strategic evaluation were asked to define zero tolerance, and most responded that it meant that there would be consequences for any staff member who committed an act of sexual exploitation and abuse.³³² However, all staff, without exception, understood that zero tolerance meant an immediate obligation to report. The key reporting channels for country office staff, with very little variability, were primarily considered to be a combination of the community feedback mechanism hotline, PSEA focal points, the country director, deputy country director, or (for the most part) direct to OIGI. PSEA focal points were generally able to identify several additional reporting channels, including community help desks, partner focal points, suggestion boxes and monitoring surveys.³³³

311. WFP commitment to zero tolerance to inaction³³⁴ was endorsed in the Executive Director circular of May 2023, after the IASC Principals' ratification of the 2021 IASC PSEAH review. This emerging concept of "inaction" has not yet been clearly explained to WFP personnel, and very few of those interviewed are aware of this shift to inaction more generally. Key informants reported varying interpretations on what zero tolerance to inaction means

³²⁶ 2 KIIs.

³²⁷ The evaluation team refers to "case management" as the process of: (i) receiving the complaint at the local level; (ii) reporting through the internal channels to the identified PSEA focal points and to OIGI; and (iii) referring the victim to the appropriate assistance through the local referral system.

³²⁸ WFP defines the obligation to "do no harm" as: "anyone working in fragile settings or with people in vulnerable situations has a duty not to put them at risk of negative consequences or to increase their vulnerability to, among other things, retaliation from governments, clans, factions and families, loss of income or stigma. In addition, it must be ensured that activities support social cohesion and trust and do not exacerbate or promote conflict or cause harm to the environment." (WFP Protection and Accountability Policy, 2020).

³²⁹ According to the United Nations i-Tracker, WFP has reported 17 percent of the victims from 2017 to 2022 being children (under 18 years of age) and 26 percent in the case of WFP implementing partners.

³³⁰ KII.

³³¹ KII.

³³² KII.

³³³ See Annex 9: PSEA focal point survey.

³³⁴ The SE inception report acknowledges that: "zero tolerance is a concept that is well defined, however the evaluation team acknowledging recent framing from the special rapporteur on PSEA who recently referred to the concept of 'zero tolerance to inaction'." And "This EQ is subject to ambiguity given that 'zero tolerance to inaction' is a concept yet to obtain recognition and traction.." (p.65).

and generally conveyed no clarity as to how far the zero tolerance to inaction mandate goes and a lack of detail over what responsibilities are associated with inaction.³³⁵

312. At country office and regional office levels, staff almost never interpreted the zero tolerance principle as one that held country offices or individuals responsible for ensuring that effective prevention or mitigation efforts were put in place. Nor did staff perceive zero tolerance to mean that managers could be held accountable for programme design or ineffective PSEA implementation.³³⁶

2.4.4. EQ4D. How does WFP adapt its PSEA approach according to the context and programmatic specific environment in which it operates?

313. Finding 33: PSEA action plans and broader planning tools are not routinely adapted to context. Staff may adapt for broader protection or gender-based violence risks when these appear to be escalating but consideration of how to adapt for sexual exploitation and abuse risk specifically in parallel to this appears unsystematic. Unlike some peer organizations, and being non-mandated for protection, WFP has not consistently been able to provide surge support on PSEA when new emergencies have occurred and contexts have changed. Some capacity for this is expected to be available in 2024 as part of grant-funded activity.

314. The evaluation team visited two country offices that had recently (in 2022 and 2023) responded to major emergencies (Türkiye and Pakistan) as well as contexts where the protracted nature of the context requires constant monitoring and adaptation (Mozambique and Nigeria). In Türkiye and Pakistan, the country offices had identified an increased risk of gender-based violence due to heightened vulnerability and accordingly designed their responses to be aware of gender equity and disability inclusion. In neither case had the country office specifically assessed for increased vulnerability to sexual exploitation and abuse nor was it able to point to adapted PSEA measures³³⁷ despite other good PSEA practices being in place. In a crisis, the country offices was not prompted by corporate guidance or management to address PSEA adaptation. In Türkiye, it was assumed that this was being addressed by protection advisers deployed from headquarters, but a series of interviews determined that this had been a misunderstanding as this was not part of the role of the protection adviser.³³⁸ WFP will have a small team of deployable PSEA experts as part of the 2024-2026 United States Agency for International Development (USAID) Bureau of Humanitarian Assistance (BHA) project although their work will focus of a few identified countries for longer term deployments rather than an ad hoc surge. There were a small number of instances where regional humanitarian advisors undertook some missions to provided capacity support on PSEA, but this does not equate to dedicated surge support in itself.

315. In northwest Syria, a protracted crisis, where the challenges of delivering effective PSEA have been increased due to the remote access experienced by United Nations agencies, the staff are aware of the challenges presented. Staff were concerned that they would not hear about sexual exploitation and abuse issues until there is a “bigger problem”. Staff at the operational level could not remember being asked to input into sexual exploitation and abuse risk mitigation mechanisms.³³⁹ The northwest Syria team had many ideas about how WFP obligations on PSEA could be reinforced in response to programmatic and operational risk. For example, these suggestions included: training daily contractors who had routinely been involved in the delivery over many years and asking them to sign a commitment; establishing a confidential rumour-sharing hotline specifically for drivers and shopkeepers who are at the frontline of delivery as a strategy to build trust with that cohort; more customization of visual aids; and joining together with health organizations that have more access to women and children to do joint PSEA campaigns. When the evaluation team asked why these ideas had not been tried out operationally, staff members said they had not proposed them as they did not understand PSEA to be part of their job.³⁴⁰

316. In Mozambique, the Cabo Delgado province has dealt with ongoing conflicts for several years, which has led to the displacement of hundreds of thousands of people. Recognizing the disproportionate risk faced by women and girls, the Mozambique country office carried out a gender-sensitive conflict analysis, which includes an

³³⁵ 3 KIIs.

³³⁶ 7 KIIs.

³³⁷ 2 KIIs.

³³⁸ 2 KIIs.

³³⁹ KII.

³⁴⁰ 2 KIIs.

analysis of sexual exploitation and abuse incidents among internally displaced communities in Cabo Delgado.³⁴¹ This desk review provided recommendations for WFP regarding PSEA for internally displaced communities, which have been used as a basis for measures included in the PSEA network action plans. WFP has also participated in inter-agency networks in Mozambique.

317. **Finding 34: Initiatives to support learning on PSEA and share experience are now taking place and are valued by staff and, although the target audience for learning has been primarily PSEA focal points, the Ethics Office has started to conduct PSEA senior leader training. There is little evidence of feedback loops on adaptive PSEA programming and innovations.**

318. There have been few opportunities for country offices to learn from each other and to understand what is effective in contextualization and adaptation of PSEA. As noted, the Ethics Office did undertake an exercise of compiling best practice and put in place an advisory network to share learning when it was given responsibility for PSEA in 2018, but there is no record of this network being active in recent years. The Ethics Office produced a series of PSEA updates covering 2019 to 2023 with the last of these updates being the 2023 review published in January 2024.³⁴² These are newsletters (or information sheets) targeted at focal points, and others in WFP, highlighting current projects and initiatives and plans.

319. Requests by the evaluation team for documentation on learning led to accounts of trainings, or of focal point workshops supported by the Ethics Office. The WFP Global Update on COVID-19, which focused on growing needs and the response to COVID-19,³⁴³ did not include any mention of adaptation regarding sexual exploitation and abuse risks, instead focusing on logistics and programmes.³⁴⁴

320. Beyond headquarters, the evaluation team was unable to find any regional bureaux documents that sought to consolidate country office PSEA activities and provide an overall advisory steer and strategic lens, nor was the evaluation team able to obtain regional-level packages of lessons learned on PSEA. The Ethics Office held the first regional PSEA retreat in Rome in June 2023. It brought together regional humanitarian advisors, regional gender advisors, and dedicated PSEA advisors and coordinators from selected country offices where dedicated roles exist. The internal workshop report contains 17 direct and significant recommendations and actions for the Ethics Office and the overall summary strongly supports the findings in this evaluation report.

321. PSEA was one of five sessions prioritized at the WFP Annual Partnership Consultation 2023,³⁴⁵ which had localization as a common thread. In the consultation, WFP expressed to partners that it was a priority to invest in prevention, the criticality of involving local communities and women-led organizations in PSEA design, and that effective system-wide PSEA would be dependent upon culture change across the humanitarian and development system. The report does not detail any specific commitments that were made by WFP.

322. It is unclear how monitoring data are fed back to inform risk assessments, programme activities or communications, with some notable exceptions. Uganda and northwest Syria country offices offer promising examples of the adaptation of risk registers to reduce sexual exploitation and abuse risk (see Box 17). Further good practice has been identified in the Bangladesh country office (see Box 18).

³⁴¹ WFP. 2023. Cabo Delgado Gender Sensitive Conflict Analysis – Desk Review (unpublished).

³⁴² WFP. 2023. Protection from Sexual Exploitation and Abuse (PSEA_U) Updates Collection. <https://www.wfp.org/publications/protection-sexual-exploitation-and-abuse-psea-updates-collection>.

³⁴³ WFP. 2020. WFP Global Update on COVID-19: November 2020: Growing Needs, Response to Date and What's to Come in 2021.

³⁴⁴ KII. (An after-action review is a technique for improving process and execution by analysing the intended outcome and actual outcome of an action and identifying practices to sustain, and practices to improve).

³⁴⁵ WFP. 2023. Annual Partnership Consultation (APC) Report 2023 (not published)

Box 17. Promising practice in the development and follow-up of PSEA in risk registers and mitigation

Sexual exploitation and abuse inclusion in risk registers allows country offices to pinpoint mitigation measures with assigned accountabilities. Uganda exemplifies effective use of risk registers, notably addressing high-risk groups like security guards. Specific action plans, like one for security vendors in 2021, demonstrate proactive mitigation efforts. In northwest Syria, a customized PSEA risk register for general food assistance expands on standard templates. It categorizes sexual exploitation and abuse risks into four areas, enabling tailored mitigation strategies. These include:

- nature of general food assistance interventions/programming;
- implementation through the Syrian Arab Red Crescent (SARC) and other cooperating partners' management;
- under-reporting within the targeted communities; and
- coordination between PSEA focal points and programme teams.

The Uganda country office went beyond standard mitigation like staff training, breaking down sexual exploitation and abuse risks into categories for tailored measures: third-party monitoring to encourage reporting; budgeting for beneficiary transportation; and integrating PSEA into capacity building for cooperating partners.

323. Aside from the promising practice set out in Box 17, many informants expressed frustration at not being able to analyse trends due to lack of data on the prevalence of sexual exploitation and abuse or inconsistency over how (and where) it is reported.³⁴⁶ Where trends are analysed, there is a lack of guidance on how to adapt PSEA communications, education tools and activities based on the monitoring results.³⁴⁷

324. This lack of inclusion of PSEA learning at the programme level is exemplified through the Evaluation of Pakistan's Humanitarian Response Facilities Network, which covers WFP contributions through the humanitarian response facilities network.³⁴⁸ One of the key findings of this evaluation is that considerations regarding PSEA are completely missing from the design of the programme.³⁴⁹ Operational recommendations in the evaluation urge the WFP Pakistan country office to more systematically include "GEWE, protection, and accountability to affected populations (AAP) [...] in interventions related to emergency preparedness and response, in alignment with the organization's Gender Policy and with the commitments of the Government of Pakistan."³⁵⁰ Recommendation 3.2 specifically speaks to the better use of data usage for informing PSEA considerations in the programme.

325. Some staff interviewed also raised trust issues related to the use of the reporting channels themselves, but there is no indicator or tangible metric to measure this aspect.³⁵¹ It should be stated that this overall lack of data feedback mechanism relating to sexual exploitation and abuse reporting and PSEA implementation data is a symptom of a wider data processing capacity constraint:³⁵²

"But if you ask me who uses the information, I would say nobody. Just as with monitoring information in general!"³⁵³

³⁴⁸ WFP. 2022. Evaluation of Humanitarian Response Facilities Network in Pakistan from January 2014 to September 2020 (DE/PKCO/2020/016)

³⁴⁹ Ibid., pg. ii

³⁵⁰ Ibid., pg. iv.

³⁵¹ WFP. 2023. Annual Country Reports – Haiti. [Annual Country Reports – Haiti | World Food Programme \(wfp.org\)](#) 2 KILs.

³⁵² WFP. 2023. Evaluation Synthesis of WFP's Performance Measurement and Monitoring (2018-2021).

³⁵³ KII.

Box 18. Good practice: Continuing capacity building and community awareness of sexual exploitation and abuse risk

The Bangladesh country office continuously undertakes capacity building due to staff turnover and risk levels. Prior to monitoring, there are attempts to understand and identify the risks so that the appropriate mechanism for community awareness-raising can be undertaken. The country office has printed a significant number of posters and other printed materials, which are translated and posted in schools, shops etc. They are then field tested. The materials include local phone numbers for complaints. The lines to the complaint and help desks are free and each household has been provided with a card with the hotline number on it. The PSEA focal point leads also work with programme staff to try to ensure that all operators are women.

All monitoring staff are trained and sensitized. WFP uses a specialized research organization to do this. The monitoring has proxy indicators to establish whether the beneficiaries are aware of the hotline channel. If the hotline number is not known by 50 percent of the beneficiaries, this is considered a “red flag” and the protection team introduces more emphasis into the focus group discussions.

2.5. EQ5: How is WFP capability positioned to be responsive to a changing operational environment?

326. In assuming the IASC Champion role in 2024, WFP will be responsible for providing leadership and political advocacy for the fulfilment of the IASC strategy on PSEAH and for continuing to “set the tone” internally and externally. WFP has not yet positioned itself to fully implement these commitments over the medium term. Against a changing operational environment, including ongoing funding reductions, WFP does not have a plan in place to support a short- or medium-term scale up of PSEA activity as required by the 2023 Executive Director circular, or to ensure that PSEA is mainstreamed into programming. The WFP “reassurance” action plan developed in 2023 did not highlight the risk of sexual exploitation and abuse at the same level as the risks of fraud, corruption and aid diversion. WFP does not have contingency plans in place should there be any increase in cases, and there are no current protocols for PSEA scale-up in an emergency response. CSPs are not yet providing confidence that the foundations for change at the country level are being put in place.

2.5.1. EQ5A. How well is WFP focusing on medium-term planning for PSEA and preparing to meet the needs of a changing operational environment?

327. **Finding 35: WFP is now starting to make progress toward the medium-term commitments outlined in the IASC vision and strategy. Previous Champions have found that the assumption of the IASC Championship role is an opportunity to revitalize organizational efforts on PSEAH. However, WFP has embarked on this Championship at a time of significant operational and institutional challenge.**

328. By taking on the role of IASC PSEAH Champion in 2024, WFP will have a visible role in PSEA inter-agency engagement and will be responsible for setting the tone for all entities. The priority for the IASC Champion is to support implementation of the IASC vision and strategy up to 2026.³⁵⁴ The prioritized IASC strategic commitments up to 2026 are to: 1. operationalize the victim-centred approach; 2. promote lasting change in organizational culture, behaviour and attitudes; and 3. support country capacity prioritizing high-risk contexts. The individual progress of WFP toward the IASC commitments are set out in bold in the following paragraphs.

329. **Operationalization of a victim-centred approach:** Starting with articulation of a commitment to a victim-centred approach in the 2023 Executive Director circular, this is a work in progress. WFP does not yet have a collective understanding of what change may be required, and nor does it have standard operating procedures to enable WFP to ensure the adequacy of its reporting channels for sexual exploitation and abuse victims or clarity on how and through what resources, support to victims should be provided.

330. **Promoting lasting change in organizational culture, behaviour and attitudes towards all forms of sexual misconduct:** The importance of ensuring that WFP culture reflects zero tolerance to inaction on sexual exploitation and abuse is reflected in the 2023 Executive Director circular, but has not yet translated to an understanding, at all levels or across all management, of what this responsibility entails. The IASC leadership is a

³⁵⁴ IASC. 2022. IASC Vision and Strategy (2023-2026).

significant demonstration of WFP commitment to PSEA at the highest level. While the mandatory PSEA training module ensures basic understanding of conduct and principles across all staff, feedback from staff reflects that PSEA is not yet understood to be part of everyone's responsibility.

331. **Support country capacity prioritizing in identified high-risk contexts:** WFP must ensure that PSEA capacity is a systemic part of scale-up in response to crises. WFP is a first responder in some crises but does not yet have the mechanisms or capacity to deploy its own PSEA focal points to respond to priority contexts. PSEA budgets are not yet systematically prioritized.

332. Previous Champions have been able to use the Championship to drive cultural, administrative and operational progress on PSEAH within their own organizations. Interviewees from the comparator agencies have explained that this requires: senior leadership time, commitment and visibility; a cross organizational taskforce to collectively oversee the delivery of a strategy or action plan; and a small but reliable source of funding.

333. **Finding 36: The Ethics Office includes PSEA in its “ethical risk mapping”, but WFP does not yet have a systematic approach to identify and prioritize limited PSEA capacity support from headquarters or regional bureaux. The current drive for efficiencies may overlook increasing risk of sexual exploitation and abuse occurring because of escalating vulnerabilities and decreased budgets at the programme level.**

334. Since 2021, the Ethics Office has run an internal ethics risk map, which identifies country offices or regional bureaux with the highest risk of experiencing ethical challenges, including sexual exploitation and abuse and the potential impact of ethical challenges upon beneficiary caseloads. This is updated annually. The Ethics Office considers risk indicators to measure the likelihood of behaviour that does not conform with ethical conduct or ethical expectations. This includes considering data sources such as: results of global staff survey questions on standard of conduct; results of the ethics and PSEA questions in the Executive Director assurance exercise; information on allegations related to sexual exploitation and abuse or conflicts of interest; results of an annual United Nations-level PSEA survey; statistics on the completion of the mandatory e-learning on ethics and PSEA; and data from the Ethics Office's case management system. The Ethics Office also consider general internal and external indicators to measure risks to WFP operations from both internal and external factors, such as the internal Risk Management Division's country risk profile, which covers, among others, the corruption perception index, and the corporate alert system.

335. The intention of the Ethics Office is now to build a monitoring and analytical framework that will support the ability to more clearly identify contexts of high risk where more focus and resources need to be provided to PSEA activities.³⁵⁵ The further development of this framework will allow aggregated analysis of country action plans and other tools and could contribute to regular reporting to senior management. This framework could potentially also provide analysis and data to support the provision of guidance and to support the strategy review process for CSPs.

336. Currently the longer-term sexual exploitation and abuse risks associated with political, environmental, and resourcing trends are not being reviewed at any level within WFP.³⁵⁶ In October 2023, the Executive Director discussed the changing operational environment in a letter to all staff and launched a series of significant processes to stop “business as usual”³⁵⁷ while the organization took stock of the implications for its work. The evaluation team could not identify evidence to demonstrate that sexual exploitation and abuse risk was on the strategic change agenda of the organization at the same level as fraud, corruption, or aid diversion. A review of the “Background note for the Executive Board: WFP reassurance plan 25 September 2023” shows that sexual exploitation and abuse is mentioned once in reference to community feedback mechanisms' facilitation of reports, and PSEA is mentioned once in relation to WFP commitment to conducting fraud risk assessments. As research, including some supported by WFP, has demonstrated, the risk of sexual exploitation and abuse increases when community vulnerability increases because of aid cuts and retargeting.³⁵⁸ There is a risk that the drive to ensure and to demonstrate efficiencies will result in increased risk exposure to sexual exploitation and abuse for

³⁵⁵ KII.

³⁵⁶ KII.

³⁵⁷ The New Humanitarian. 2023. WFP warns staff on spending, orders 'comprehensive review': internal email. [The New Humanitarian | WFP warns staff on spending, orders 'comprehensive review': internal email.](#)

³⁵⁸ Empowered Aid | The Global Women's Institute | The George Washington University (gwu.edu), [2021 IASC External Review of PSEA/SH | IASC / PSEA \(interagencystandingcommittee.org\)](#), [The New Humanitarian | EXCLUSIVE: How a WFP food aid revamp has gone wrong for refugees in Uganda.](#)

vulnerable people. Inevitably any sharp unaddressed increase in sexual exploitation and abuse reports could result in additional challenges to funding.

337. WFP has increased capacity within investigations in 2022 (not specific to sexual exploitation and abuse) and any sexual exploitation and abuse or sexual harassment case is prioritized within OIGI.³⁵⁹ This means that investigation times for SEAH cases have reduced but potentially at the cost of non-SEAH cases being deprioritized. Interviews with WFP headquarters staff suggest that an acknowledged SEAH backlog is being addressed. However, as all complaints continue to rise in line with the increased WFP operational footprint in the last five years (complaints were 865 at August 2023 and were projected to be over 1,000 by the end of 2023 whereas in 2022 they were just over 900) the fact that the budget for investigations is to be reportedly budget neutral in 2024 means that progress may slow again.³⁶⁰ Were there to be a sharp increase in sexual exploitation and abuse reports, the capacity to ensure investigations are timely might not be in place. It is probable that complaints may increase as budget cuts bear down on country offices and retargeting increases. The evaluation could not identify any evidence that WFP had a contingency plan in place for such an eventuality.

2.5.2. EQ5B. How well is WFP accessing resources to cater for medium-term PSEA framework needs?

338. Finding 37: Apart from one recently secured grant, there is no evidence of WFP leadership proactively prioritizing PSEA needs in dialogue with donors. Donors at the global and regional levels perceive WFP to be reactive rather than proactive on PSEA. Moving forward on the commitments in the 2023 Executive Director circular and the commitment of the Executive Director to be the IASC PSEAH Champion offer the opportunity to change this perception.

339. In 2024, WFP will be engaging with a significant funding decline and deficit against assessed and projected increasing vulnerability and needs.³⁶¹ This has seen half of WFP country offices implementing or planning to implement significant reductions in the size and scope of programmes and some by up to 50 percent at the end of 2023.³⁶² WFP has significantly increased its operational footprint over the last five years but now this footprint will reduce again because of funding gaps. This is unlikely to be a short-term funding gap but a medium- to long-term change to funding patterns. This is happening in parallel with the strategic evolution of WFP on delivery modalities, which entails working more closely with national organizations, governments, private sector and financial service providers; all of which may require customized support to build capacity on PSEA. Despite the reassurance plan, reduced budgets in contexts visited by the evaluation team over the last two years are already driving concerns about increased vulnerability at the community level – leading to increased risk of sexual exploitation and abuse – and decreased capacity for oversight and monitoring.

340. The evaluation was not able to gather evidence that WFP has been initiating conversations at senior or leadership levels with donors about proactive strategic approaches to PSEA or that WFP has been undertaking advocacy for resourcing PSEA routinely within programmes. Donors therefore do not feel that a compelling case has yet been made for why PSEA should require additional funding rather than PSEA being an agreed management cost.³⁶³ There is no clarity yet on how WFP intends to advocate for burden sharing with donors on PSEA financing or to broker alliances around advocacy to host governments or other actors. Some donors appear interested in supporting WFP to undertake innovative work or work that will promote inter-agency good practice and see WFP as having the leverage and influence to develop and model good practice. Some donors would, however, like to see a commitment to “standardization rather than projectization” of PSEA resources at the country office level from WFP before additional support can be discussed.³⁶⁴ Executive Board members were keen to express appreciation for the progress demonstrated by WFP over the past few years but at the same time consistently expressed concern that WFP is not able to evidence results and has been reactive in PSEA scale-up rather than proactive.

341. While WFP has expanded its headquarters PSEA capacity in recent years, some of these posts will be project donor funded from 2024 onwards. There will be one or two positions funded by projects starting in 2024,

³⁵⁹ KII.

³⁶⁰ KII.

³⁶¹ In December 2023 WFP said that it was projected to be a 60 percent funding shortfall.

³⁶² *ibid*, WFP. 2023. A global food crisis. [A global food crisis | World Food Programme \(wfp.org\)](https://www.wfp.org/publications/global-food-crisis).

³⁶³ KII.

³⁶⁴ KIIs.

which will focus on deployable support with a focus on in-country food security clusters and global learning. Should the pilot projects be successful, it is unclear how these posts will be sustained or how they would contribute to any medium-term strategic approach to PSEA.³⁶⁵

³⁶⁵ BHA proposal; KII and comments received from Ethics Office.

3. Conclusions

342. **Overall**, this evaluation has found that over the last five years WFP has made considerable progress towards meeting PSEA commitments. It now has an opportunity to consolidate these gains if it makes the necessary investment. Since the Ethics Office was given the responsibility of enabling PSEA in 2018, it has provided a clear organizational home for PSEA – even with the lean capacity provided and amidst limited visible leadership on PSEA. It has provided guidance and capacity building opportunities to PSEA focal points in regional bureaux and country offices, which now provides a solid foundation for a broader infrastructure for PSEA. Guidance, however, cannot substitute for solid, proactive support and focal points who have the time available to deliver against their responsibilities.

343. WFP is now a key player in inter-agency PSEA platforms including playing its role in inter-agency processes to assess the PSEA capacity of its cooperating partner portfolio, although it is yet to determine how best to resource identified capacity building needs. Regardless, WFP, through the United Nations Partner Portal,³⁶⁶ has made available extensive guidance and resources on capacity strengthening.

344. Noting all achievements, the delivery of PSEA commitments has been consistently hindered by lack of prioritization and accountability and inadequate human and financial resources, as well as limitations in the monitoring and internal feedback loops for understanding the prevalence of sexual exploitation and abuse and the effectiveness of PSEA activity. There is no evidence that PSEA is understood to be a cross-organizational responsibility. Consequently, WFP programming is not yet adequately positioned to assess and mitigate sexual exploitation and abuse risk across all contexts or to fully mainstream PSEA in its programming. The absence of strategic and consistent investment in PSEA at the appropriate scale is being recognized now, just at the time when the organization faces considerable operational and institutional challenges. The recommendations presented in this report aim to support WFP in realizing its PSEA objectives as articulated in the 2023 Executive Director circular, while also mitigating increasing risk from a changing operational environment and elevating the future policy framework.

345. **Conclusion 1. This evaluation has found that the newly introduced Executive Director circular on PSEA brings WFP broadly – and somewhat belatedly – in line with system-wide commitments on PSEA.** The circular introduces key updates to the WFP approach to PSEA through enhanced responsibility across the organization, committing to zero tolerance to inaction on sexual exploitation and abuse, the principle of applying a victim-centred approach and further clarifying the PSEA obligations of WFP cooperating partners and vendors. The WFP approach to PSEA has been supported by multiple but uncoordinated corporate commitments to PSEA in the WFP Strategic Plan (2022-2025) and an increasing referencing of PSEA in organizational policies and CSPs. The Executive Director circular, however, is not the policy instrument to examine critical issues such as the underlying causes of sexual exploitation and abuse and cultural change, or to articulate a broader set of operationalized definitions of zero tolerance on inaction to sexual exploitation and abuse or to the victim-centred approach.

346. **Conclusion 2. The Ethics Office has steadily built WFP PSEA capacity over the last five years.** However, the Ethics Office's own PSEA capacity is only now approaching levels comparable to equivalent capacity at headquarters in peer organizations. The Ethics Office has established a good, committed, focal point network that provides a strong foundation for fulfilling commitments at the operational level. The focal points network universally values the support from the Ethics Office while also noting the significant limitations with which the Ethics Office has had to contend. Focal points are also acutely aware of their responsibilities and limitations in providing adequate attention to PSEA. Currently the Ethics Office and regional bureaux do not have the resources to provide the focal points with the support that is required but

³⁶⁶ [Inter-agency PSEA IP Protocol Resource Package for Partners – United Nations Partner Portal \(unpartnerportal.org\)](https://unpartnerportal.org/).

the cost of not providing support may be significant if the potential risk is realized. As WFP seeks to deliver on a broader set of PSEA commitments, and to drive mainstreaming of PSEA through programming just as the Executive Director becomes the IASC PSEAH Champion, 2024 must represent a PSEA step-change for the organization. At all levels, current PSEA resources and arrangements will struggle to achieve greater PSEA ambitions. Formalizing and establishing a PSEA system cannot wait. There is a current gap in management confidence to proactively engage and deal with the issue. This must be addressed and will also require time and resources. It is unfortunate that resourcing PSEA appropriately was not considered when budgets were increasing.

347. **Conclusion 3. PSEA commitments have not been mainstreamed across the WFP policy landscape and many WFP staff do not see themselves as having operational responsibilities to deliver on PSEA obligations.** In contrast to other agencies, WFP does not currently have a standalone policy and implementation strategy to guide the delivery of its PSEA commitments. The WFP Strategic Plan (2022–2025) does not sufficiently detail the organization’s approach to meeting the PSEA commitments. This is also the case across the 34 policies which underpin the strategic plan. While PSEA is referenced in several more recent policies, detailed expectations and actions are not articulated, thereby undermining the operational efficiency of PSEA activities. This also means that many WFP staff, aside from PSEA focal points, do not see themselves as having technical or operational responsibilities related to PSEA despite the Ethics Office vision (endorsed by the Executive Board) to mainstream PSEA. There is a clear trend towards PSEA being “referenced” (often in single terms only) in country strategy plans or within evaluations – including evaluations of country strategic plans in sexual exploitation and abuse high-risk contexts. This rarely amounts to any consideration of the programmatic or country contextualized risk. Programming presenting potential or unknown sexual exploitation and abuse risks, such as cash-based transfers or school feeding, do not yet have PSEA considerations built into programme design. The absence of clear directive language in sectoral strategies or in most country strategic plans amplifies the risk WFP is facing. This is particularly important given the need for re-targeting in the face of current and imminent resource constraints.

348. **Conclusion 4. WFP has now committed to a victim-centred approach in the 2023 Executive Director circular, but has not yet been able to absorb what this commitment entails.** This is understandable given the recent nature of the commitment. Many peer organizations are also still considering the implications of a victim-centred approach to their PSEA preparedness and response activity. WFP is yet to provide orientation on this, or to integrate how to deliver a victim-centred approach into case management tools, standard operating procedures, intake interview guidelines, and in-country case reporting systems. There are opportunities to learn from work already undertaken by other United Nations organizations to determine how WFP can operationalize a victim-centred approach within operating contexts and provide clarity on resourcing implications.

349. **Conclusion 5. Progress is being made, but PSEA is not yet systematically operationalized within WFP.** Many of the elements of a PSEA system are now in place, and there are increasingly positive examples of them being deployed at the country level. However, there is not yet a PSEA system. At the most basic level, current practice includes compliance numbers for the mandatory training being consistently high and all contracts containing reference to PSEA commitments and contractual obligations, as well a “functional” community feedback mechanism. The 2023 reassurance plan explicitly refers to the need for “safe, inclusive, accessible channels” to “facilitate incident reports of a sensitive nature,” including for sexual exploitation and abuse in all high-risk operations. Staff with PSEA responsibilities are mostly not able to describe a PSEA “system” or explain the linkages between PSEA activities. Community feedback mechanisms require further investment and contextualization to fully address PSEA needs.³⁶⁷ Despite efforts already made to scale up targeted PSEA training, much more is required, as is increased investment

³⁶⁷ The evaluation team developed a preliminary logic model during inception phase that has been revised. Revisions to the model are in Annex 4. Looking forward, given the new WFP PSEA Champion status for 2024, the logical model now recognizes WFP as a “leader and catalyst for evolving global PSEA policy and practice”.

in the focal point community of practice. In addition, while technical understanding of PSEA is growing across WFP – specifically among focal points – a broader learning and knowledge management agenda for PSEA is embryonic. PSEA is not a focus for preparedness activity. The sole reliance of WFP on community feedback mechanisms for receiving sexual exploitation and abuse complaints is a weakness. WFP is not encouraging managers to follow up on an absence of reports on sexual exploitation and abuse through different channels.

350. Budget allocations for PSEA at the headquarters level are not protected and continue to be vague and very poorly documented. WFP has now secured a significant grant at the global level for the development of PSEA global goods and surge capacity, but this may not address the lack of clarity at the country office level unless each deployment (as is planned) includes comprehensive learning support that is eventually translated into global learning and associated tools. Currently, WFP country offices cannot itemize what they are spending on PSEA or provide national or programme level analysis of spend. Among other drawbacks, this is a limitation when approaching donors for support or seeking to be transparent with government partners. Monitoring systems are not customized to address contexts or programme modalities considered to be high risk for sexual exploitation and abuse, and managers do not receive monitoring data that provides them with confidence that PSEA commitments are being met.

351. In many contexts significant efforts have been undertaken to enhance the overall safety and protection of beneficiaries at the field level from a gender-based violence perspective, which has positively – if inadvertently – provided sexual exploitation and abuse-risk mitigation. Considering the locations of distribution sites or ensuring that women staff are present and visible at distribution sites – has had positive implications for mitigating sexual exploitation and abuse risk. In most cases however, the evaluation team found that these were unintended positive changes as sexual exploitation and abuse risk and PSEA had not been a factor proactively considered in the programme design. Teams were focused on reducing opportunities for community or household gender-based violence and not on considering programme design and the programme cycle to understand where targeting, delivery and monitoring might be increasing or sustaining opportunities for abuse of power by those delivering aid. Consideration of such protection design weaknesses from a sexual exploitation and abuse-risk mitigation perspective is also not being undertaken when contexts or delivery modalities change.

352. **Conclusion 6. WFP has placed a strong reliance on compliance to manage the sexual exploitation and abuse risk in its partnerships.** However, this approach conceptually relies on a “traditional” model of partnership with international NGO partners that are considered to have their own capacities in PSEA – a model that would require limited engagement and support from country offices. This amounts to a delegation of responsibilities that has been acceptable to WFP from a risk management perspective, regardless of whether it is comprehensively effective. As WFP increasingly seeks diversification of its partnership base to national organizations, governments, private sector, or financial service providers, a reliance on compliance and a brief orientation on WFP expectations will not suffice. It indicates an escalation of overall PSEA risk, which has not been weighed. WFP does not only partner with NGOs that already have existing capacities on PSEA. To continue work already begun with partners with NGOs with less PSEA experience while supporting them to build their capacities under the United Nations implementing partner PSEA capacity assessment, WFP should ensure that country offices have, or have access to, sufficient support. In addition, partnerships with vendors and financial service providers are a significant collective blind spot for sexual exploitation and abuse risk and WFP does not customize its PSEA approach to effectively engage with these partners. As WFP also increasingly seeks partnerships based upon knowledge or technology transfer, the organization has not considered what part PSEA should play in these partnerships. In short, current approaches to risk mitigation on sexual exploitation and abuse with partners is outdated and overly linear. However, regional and country office focal points are already overloaded and cannot currently provide the diversity of support to partners that the evolving partnership portfolio requires.

353. **Conclusion 7. WFP guidance until recently was overly focused on the responsibility to report.** PSEA programming is still geared towards reactive measures based on incident detection – as demonstrated in current community feedback mechanism structures – rather than prevention mechanisms, including those that address root causes of vulnerability and exposure to sexual exploitation and abuse risk. While WFP continues to diversify its delivery model and deliver in hard-to-reach contexts where vulnerability to sexual exploitation and abuse is both acute and chronic, ensuring that all staff understand their role in preventing sexual exploitation and abuse in their day-to-day work will make a difference. While WFP is appropriately focused on ensuring confidentiality for individual cases, there is no evidence that systemic risks are being effectively communicated, through management lines, to operations and country offices to inform and enhance preparedness and prevention activities.

354. **Conclusion 8. WFP is increasingly visible in global and national inter-agency PSEA forums although often the role at the country level is of a contributor, rather than a leader.** WFP can celebrate the advantages of such cooperative work, for example the sharing of the weight of system-wide cooperating assessments. As WFP is only recently offering to occupy a space at the inter-agency table commensurate with its organizational size, WFP can identify areas where it has a comparative advantage and where leveraging specific partnerships will allow the organization to use its influence. This includes consideration of risks associated with cash-based transfers, school feeding, private sector actors, financial service providers, food security and livelihoods cluster coordination and logistics cluster coordination. Coordinating with others to collectively communicate clearly and appropriately with governments – which is shown to be a critical gap in the WFP PSEA approach – may be a more effective way forward than working independently.

355. **Conclusion 9. There are strong and consistent indications of an absence of trust and confidence among WFP staff and partners in WFP PSEA measures.** This factor undermines efforts on evidence-based design and programming for PSEA and has significant implications for WFP. Many WFP employees perceive inquiries into sexual exploitation and abuse as protracted, with limited feedback and updates. As a result, trust among staff in the effectiveness of sexual exploitation and abuse investigative procedures is limited, resulting in diminished motivation for confidence in the PSEA system, and for encouraging communities to trust the system. Headquarters-based staff can describe the efforts and investments that have been made to change how investigations are conducted and to improve timelines. This is reported to the Executive Board on an annual basis through a written report that staff can access. However, these efforts and the improved investigation timelines have not resonated at regional and country levels. WFP staff are asking for a different form of discussion about sexual exploitation and abuse, its underlying causes, and the criticality of PSEA, and for greater understanding of the progress that is being made in developing a robust PSEA system.

356. **Conclusion 10. Change is needed if WFP is to reduce significant, unacknowledged and unmitigated sexual exploitation and abuse risk and, more importantly, reduce risks to the most vulnerable people that WFP seeks to serve.** A historical lack of attention to the full implications of a zero tolerance commitment left WFP in 2018 without a solid foundation upon which to build a comprehensive PSEA system. Overall, WFP has seen a small, but steady, rise in cases in the last five years. Such a rise is a positive indicator of increasingly effective PSEA, but it is not proportional to the increase in the global footprint of WFP over the same period. While the humanitarian and development sector has acknowledged serial under-reporting of sexual exploitation and abuse, WFP reporting is still considerably lower than that of comparable organizations. Amid a highly constrained funding environment, prioritization of assistance inevitably means that sexual exploitation and abuse risk will increase in line with vulnerability increasing. All these conditions should also contribute to sexual exploitation and abuse complaints continuing to rise. This is not being highlighted in internal WFP discussions and planning, nor in the organization's external fundraising and advocacy. Effectively mainstreaming PSEA commitments already in place is an urgent priority requiring planning, resourcing, monitoring and reporting to managers and senior levels of WFP. It is a whole-of-organization responsibility requiring cross-headquarters attention. The evaluation team

considers this to be of sufficient urgency that acting should not wait until this evaluation is presented to the Executive Board in 2024

4. Recommendations

	No.	Recommendation ³⁶⁸	Responsibility	Other contributors	Priority	Deadline
CROSS-ORGANIZATIONAL ACCOUNTABILITY FOR AND ACTION ON PROTECTION FROM SEXUAL EXPLOITATION AND ABUSE						
IMMEDIATELY	1	Urgently invigorate and strengthen commitment to, and accountability for, protection from sexual exploitation and abuse (PSEA) across WFP by appointing a cross-organizational task force to operationalize the 2023 Executive Director’s circular through an implementation plan for 2024–2026.	Ethics			
	1.1	Develop terms of reference for a WFP-wide PSEA task force (e.g. based upon the terms of reference for the interdisciplinary task force that supported the delivery of Executive Director’s circular OED2022/004). <i>The task force should be representative of WFP divisions, including Risk Management, Programme Delivery and Emergency Coordination (all components of the Programme Operations Department) (including specialists on gender/gender-based violence and protection), Legal, Inspections and Investigations, Human Resources, Ombudsman, Communications and Media, Security and Ethics. It should include senior representation from regional bureaux and selected country offices.</i>	Ethics	Risk Management, Programme Delivery, Emergency Coordination, Programme Operations Department, Legal, Inspections and Investigations, Human Resources, Ombudsman, Communications and Media, Security, regional bureaux, country offices	High	Immediate (second quarter of 2024)
	1.2	Using the logic model presented in the evaluation report as the starting point, develop a PSEA implementation plan for 2024–2026, which will require the following: <ul style="list-style-type: none"> consolidation of existing tools and guidance for PSEA that exist within WFP; 	Ethics	Gender, Protection and Inclusion, Risk Management, Programme Delivery, Emergency Coordination,	High	Fourth quarter of 2024

³⁶⁸ To provide the necessary leadership for implementing recommendations, the independent evaluation team recommended that recommendations 1, 2, 3, 4, and 6 be led by the Office of the Executive Director. Following WFP’s February 2024 reorganisation, recommendations have been allocated to relevant capacitated divisions under the new structure, with senior leadership to ensure full responsibility and oversight for PSEA going forward.

	No.	Recommendation ³⁶⁸	Responsibility	Other contributors	Priority	Deadline
		<ul style="list-style-type: none"> mapping of the PSEA architecture (headquarters, regional bureaux, country offices) to fulfil the commitments in the 2023 Executive Director’s circular; clarification of mandatory requirements for PSEA within divisions and offices across WFP; analysis of the sufficiency of existing materials and identification of gaps; identification of linkages with programmes and technical staff in critical delivery areas such as school meals and cash-based transfers; sequenced articulation of processes and protocols for PSEA; an internal communications strategy; assessment and prioritization of risks and capacity needs for cooperating partners to meet PSEA commitments; establishment of mandatory minimum requirements for PSEA consideration within country strategic plans; and establishment of an agreed business continuity plan to ensure stakeholder confidence of vulnerable populations in the event of a spike in complaints. 		Programme Operations Department, Legal, Inspections and Investigations, Human Resources, Ombudsman, Communications and Media, Security, regional bureaux, country offices		
CAPACITY AND RESOURCING						
IMMEDIATELY	2	In line with international obligations on PSEA and within available resources, commit sufficient capacity and resources at headquarters, regional bureaux and country offices for effective PSEA.	Office of the Chief of Staff			
	2.1	<p>Strengthen and elevate the formalized PSEA capacity and structure at the headquarters level by ensuring that the most senior PSEA post reports directly to the Chief of Staff or the Deputy Executive Director. This change in line management effectively requires the development of a PSEA Unit outside the Ethics Office but within the Office of the Executive Director with oversight of the cross-organizational PSEA task force. Allocate dedicated resourcing for PSEA, particularly at the country level, to bolster, accelerate and give visibility to ongoing commitments.</p> <p><i>Resourcing equivalent to at least 0.04 percent of every country budget, depending on operating environment, from the first quarter of 2024 through 2026. Prioritize immediate</i></p>	Ethics	Human Resources, Risk Management	High	Fourth quarter of 2024

	No.	Recommendation ³⁶⁸	Responsibility	Other contributors	Priority	Deadline
		<i>investment in technical support and related resourcing for high-risk contexts where significant retargeting exercises are taking place.</i>				
	2.2	Immediately update the Performance and Competency Enhancement (PACE) system to include PSEA responsibilities for all country directors, deputy country directors, regional directors, deputy regional directors, heads of programme, PSEA focal points and other relevant staff, as already called for in the 2023 Executive Director's circular, and include PSEA as a core competency in PACE for managers.	Human Resources	Ethics	High	Fourth quarter of 2024
	2.3	As part of the 2024 organizational restructuring process, carry out workforce planning to ensure sufficient capacity across WFP and include PSEA roles and responsibilities within all relevant job descriptions to clarify staff responsibilities for the prevention of and response to SEA in how they do their jobs.	Human Resources	Ethics	High	Fourth quarter of 2024
	2.4	Further strengthen the PSEA focal points network, redouble training, reinvest in the community of practice and facilitate experience-sharing.	Ethics		High	Fourth quarter of 2024
LEADERSHIP AND CULTURE CHANGE						
IMMEDIATELY	3	Build on the opportunity presented by the IASC championship on PSEA and sexual harassment to enhance the visibility, priority and clarity of PSEA for WFP.	Office of the Executive Director			
	3.1	Convene senior management at the headquarters, regional and country levels to engage in annual facilitated reflections on organizational culture, abuse and exploitation of power. This should be led by the Executive Director and should prioritize the implications for the leadership and management levels before considering the broader organizational shifts required and how staff and stakeholder trust can be enhanced.	Office of the Executive Director	Chief of Staff, Leadership Group, regional bureaux, country offices	High	Second quarter of 2024
	3.2	Issue senior management advisories and guidance in the following areas: <ul style="list-style-type: none"> clarification that prevalence of SEA reporting is indicative of a well-functioning system; operationalization of the victim/survivor-centred approach; and 	Ethics	Office of the Executive Director, regional bureaux, country offices	High	Second quarter of 2024

	No.	Recommendation ³⁶⁸	Responsibility	Other contributors	Priority	Deadline
		<ul style="list-style-type: none"> underlying causes of SEA, namely power imbalances and organizational culture. 				
	3.3	Lead IASC initiatives to operationalize a victim/survivor-centred approach. ³⁶⁹	Ethics	Gender, Protection and Inclusion , Senior Management Group, Security, Human Resources	High	Fourth quarter of 2024
	3.4	Require country offices to include an all-staff dialogue on PSEA in self-assessment processes as part of planning and regular and mid-year/end-year management reviews.	Risk Management	Senior Management Group, Ethics	High	Fourth quarter of 2024
POLICY DEVELOPMENT						
MEDIUM-TERM	4	Develop a PSEA policy and accompanying strategy by 2026 to formally affirm and elevate WFP's commitment to PSEA and to ensure that PSEA considerations fully inform the next strategic plan.	Office of Chief of Staff			
	4.1	<p>Develop a WFP policy on PSEA.</p> <p>Through a process of extensive consultation and reflection on what is needed to sustain and build trust among internal and external stakeholders and in terms of resources, guidance from the cross-organizational PSEA task force and oversight and approval from the Executive Board, the policy should:</p> <ul style="list-style-type: none"> reflect on the underlying causes of PSEA, the cultural norms expected within WFP and the way leadership will engender and sustain this culture regarding sexual misconduct; reinforce that SEA is to be expected in all contexts in which WFP operates, in recognition that all interventions involve a power differential, and recognize that an absence of complaints should result in management attention to determine why there are no complaints; 	Ethics	Programme Delivery; Gender, Protection and Inclusion	Medium	2026

³⁶⁹ Providing leadership for commitment 1 of the IASC vision and strategy 2022–2026 for the operationalization of a victim/survivor-centred approach.

	No.	Recommendation ³⁶⁸	Responsibility	Other contributors	Priority	Deadline
		<ul style="list-style-type: none"> elaborate on the implications of delivering on a commitment to a victim-centred approach; articulate a detailed definition of zero tolerance on inaction on PSEA and what is therefore expected of all staff in terms of their own conduct as well as their individual roles and responsibilities; describe how WFP will fulfil the core IASC commitments for 2022–2026 on PSEA, emphasizing those on prevention; and formalize the minimum required PSEA architecture at the headquarters, regional and country levels. 				
PROGRAMMING AND OPERATIONS						
MEDIUM-TERM	5	Enhance the links between SEA risk assessment, programme design and implementation.	Programme Operations Department			
	5.1	Integrate SEA risk assessment into WFP's operational instruments and procedures so that it becomes an automatic part of WFP's work. Critical aspects include: <ul style="list-style-type: none"> integration of SEA risk in needs assessment, programme design and programme monitoring across all activity types; integration of SEA risk assessment across all delivery modalities (e.g. cash-based transfers); inclusion of PSEA within emergency preparedness and business continuity exercises and practice; and mandatory integration of PSEA into country strategic plan design and the strategic programme review process. 	Gender, Protection and Inclusion	Ethics; Risk Management Division; Delivery Assurance Service; Programme, Policy and Guidance; Analysis, Planning and Performance; Supply Chain and Delivery	Medium	Second quarter of 2025
	5.2	Regularly review the appropriateness of community feedback mechanisms in response to operational or contextual barriers and to enhance their utility, safety and accessibility for SEA victims.	Analysis, Planning and Performance	Programme Policy and Guidance, Risk Management, Supply Chain and Delivery	Medium	Second quarter of 2025

	No.	Recommendation ³⁶⁸	Responsibility	Other contributors	Priority	Deadline
	5.3	Conduct an assessment of the risk profiles and capacity needs of current partnerships to understand how WFP should customize its approach at the country level and with different types of partners to better enable governments, community leaders, the private sector, financial service providers, third-party monitors, standby partners and others to ensure effective PSEA.	Gender, Protection and Inclusion	Ethics; Risk Management Division; Delivery Assurance Service; Programme Policy and Guidance; Analysis, Planning and Performance; Supply Chain and Delivery	Medium	Second quarter of 2025
UNITED NATIONS-LED INTER-AGENCY EFFORTS						
MEDIUM-TERM	6	Ensure that WFP's role and contributions to inter-agency efforts are commensurate with WFP's operational size and strength, to support the development of PSEA global goods.	Deputy Executive Director			
	6.1	Reinforce WFP's role in PSEA within inter-agency partnerships by seeking opportunities to support inter-agency networks and action plans at the country level and providing support to activities agreed by the United Nations country teams/humanitarian country teams in the annual action plans.	Gender, Protection and Inclusion	Ethics, Emergencies, Programme Delivery	Medium	Fourth quarter of 2025
	6.2	Leverage WFP's position and opportunity within global leadership platforms (e.g. the food security and livelihoods, logistics and emergency telecommunications clusters; the private sector partnership portfolio; and cash-based transfers) to ensure that PSEA is part of the approach and coordination efforts. Specifically, this will include: <ul style="list-style-type: none"> • advocacy by WFP-led clusters with cluster members on PSEA responsibilities; • inclusion of PSEA in design and assessments; and • coordination of cluster training on PSEA and PSEA awareness-raising. 	Gender, Protection and Inclusion	Emergencies; Ethics; Programme Operations Department; Workplace Management	Medium	Fourth quarter of 2025

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