

Think Piece: Sustainable and Effective Resourcing for Protection from Sexual Exploitation, Sexual Abuse, and Sexual Harassment (PSEAH)

Executive Summary

1. **Throughout development of the Common Approach to Protection from Sexual Exploitation, Sexual Abuse, and Sexual Harassment (CAPSEAH) inadequate resourcing for PSEAH was identified as a common and prevalent barrier to progress.** That is why the importance of ensuring that PSEAH efforts are properly resourced is embedded in CAPSEAH¹ and in early 2024 a small multi-stakeholder group was set up to explore the issue further. The group aims to develop a system-wide understanding of PSEAH resourcing needs and challenges, and provide recommendations for improvement for the next 5 years. This think piece synthesises reflections so far and is intended as a basis for dialogue.
2. **Investments in PSEAH have played a significant role in the progress made in recent years.** The humanitarian, development and peace (HDP) sectors have established the foundations of organisational architecture to protect against SEAH, with clear policies, standards and commitments, vetting schemes, due diligence mechanisms, staff training, community outreach, specialist technical and human resources, systems and funds to support victim-survivors.
3. **Investments and funding mechanisms have however mainly been short-term and uncoordinated, with insufficient funding predictability and scale to meet needs. This has undermined the cohesiveness and accountability of the PSEAH architecture, and has not made it possible to collectively embark on a transformative, decisive and sustainable journey for PSEAH efforts.**
4. **Improved resourcing for PSEAH might be seen as costly and politically difficult at a time of stretched ODA budgets and a challenging international landscape, but the cost of the status-quo is likely to be much greater.** SEAH risks are systemic and perpetual. They remain rooted in power differentials and gender inequalities, increasing with growing global crises and deepening vulnerabilities. Lack of sustained investment curtails the ability of HDP actors to prevent and respond to harm caused by SEAH and implement effective programmes.
5. **We estimate that key investments requiring an extremely small fraction of global ODA would, if formalised, effective and backed by clear commitments and collaboration, help significantly accelerate and consolidate PSEAH efforts over the long term.** This paper suggests a structure for investments targeting (i) Global Public Goods, with a focus on consolidating existing global tools and filling priority gaps; (ii) Country packages, with the aim of reinforcing country capacity and a focus on collective, tailored and survivor-centred initiatives (this is where the bulk of resourcing need lies) and (iii) Organisational PSEAH, with the aim of strengthening the capacity of individual agencies and organisations through more systematic and transparent budgeting and financing.
6. **More funding will not, on its own, be enough. Efficiencies, transparency and better collaboration are needed to ensure and sustain a more effective and accountable PSEAH architecture.** Also key to success will be forging stronger linkages between PSEAH, GBV prevention and gender equality programming; more systematic, proactive and visible leadership driving organisational and system-wide accountability; and more actions to drive systemic and organisational cultural change.
7. This think piece aims to contribute to the development of an improved level of transparency and understanding on PSEAH resourcing needs, and underpin dialogue towards a new 'compact' between all funders, partners and recipients that commits to more effective collaboration, clearer accountability, better alignment on funding priorities and requirements, and more systematic monitoring and evaluation of results and impact.

¹CAPSEAH gives background and context to wider PSEAH work, as well as common principles and minimum recommended actions to tackle SEAH. Principle 4, and Minimum Actions 1a and 2b all highlight the importance of adequate resourcing. The [Further Information and Resources Section](#) includes a section on terms, definitions and abbreviations.

Key recommendations

<p>Global Public Goods</p>	<p>Scale up and improve <u>collective</u> action to address common needs and challenges.</p> <p>Maintain or improve investment in</p> <ul style="list-style-type: none"> o Rolling out and ensuring survivor-centered approaches o Promoting independent reviews to learn, adjust and do better o Promoting alignment around PSEAH Standards and best practice o SEAH risk analysis, prevention and monitoring o PSEAH evidence building and learning o Employee vetting schemes o Improving investigation capability <p>Also seek greater efficiencies and effectiveness, particularly through:</p> <ul style="list-style-type: none"> o Reduced duplication and greater alignment around capability assessments, due diligence and audit, including verification and passporting o Sharing and adopting best practices on community outreach and engagement o Improving reporting mechanisms o Further consolidate and pool training and capacity-building
<p>Country Packages</p>	<p>Use Global Public Goods to boost country capacity, and improve investment in:</p> <ul style="list-style-type: none"> o Dedicated inter-agency staff o Inclusive, multistakeholder networks and coordination o Action plans/Packages of <u>collective</u> interventions, tailored to contexts <p>Also seek greater efficiencies and effectiveness by:</p> <ul style="list-style-type: none"> o Scaling up good practices including locally-led and survivor-centered ones o Engaging in inclusive networks o Using existing mechanisms and collective actions when they exist, and partnering to develop them where not
<p>Organisational PSEAH</p>	<ul style="list-style-type: none"> o Ensure that PSEAH policies, approaches and risk mitigations are backed up by sufficient resources over the long term o Systematically encourage clear PSEAH budget lines in operational and programme budgets o Improve monitoring of resourcing down the delivery chain, track and ensure that frontline partners have what they need to prevent and respond to SEAH o Ensure PSEAH resourcing policies and practices provide grantees and partners with enough resources to manage SEAH risks durably and robustly.

8. The Resourcing Working Group will continue working for another year. We will explore innovative funding schemes, unpack crucial topics including linked to prevention and response, and further develop and socialise the ideas in this paper across a wider network. You are invited to comment on this paper through the [CAPSEAH website](https://www.fcdo.gov.uk/capseah) or by emailing CommonApproach.PSEAH@fcdo.gov.uk.

CAPSEAH Think Piece: Sustainable and Effective Resourcing for PSEAH

Background

1. At a [Wilton Park \(WP\) event in June 2023](#) to discuss the development of a Common Approach for Protection from Sexual Exploitation, Sexual Abuse, and Sexual Harassment (CAPSEAH)², participants noted that a common and prevalent barrier to making progress on tackling SEAH across humanitarian, development and peace (HDP) work is that resourcing for PSEAH tends to be insufficient, unpredictable, often reactive, and short-term. A lack of prioritization, fragmented funding mechanisms and a lack of clarity on where and how much funding is needed all contribute to the situation.
2. The importance of ensuring that PSEAH efforts are adequately resourced is embedded in the CAPSEAH Common Principles and Minimum Recommended Actions:
 - **Common Principle 4:** Embed SEAH prevention as part of working culture. Always act with integrity and help create and maintain an environment which prevents, reports and responds to SEAH. Leaders and managers at all levels have particular responsibility to resource, develop, implement and support PSEAH systems to proactively identify, monitor and address SEAH risks and reports.
 - **Minimum action 1a:** Set, resource, implement and adhere to a PSEAH policy/strategy aligned to these common principles, minimum actions and the standards that underpin them.
 - **Minimum action 2b:** Leaders should allocate sufficient resources to prevent and respond to SEAH. Adequate human, technical and financial resources are needed to implement PSEAH policies, both within core business and specific pieces of work (projects/programmes etc).
3. Starting early 2024, a small multi-stakeholder group was set up comprising donors, UN agencies, NGOs, International Financial Institutions (IFIs), private sector representatives and independent researchers to begin a dialogue to develop a system-wide understanding and mapping of PSEAH resourcing needs and challenges, with the aim of providing practical recommendations to improve PSEAH resourcing over the next 5 years.

The case for investing in PSEAH

4. There are a number of compelling reasons to invest in measures to prevent and effectively respond to SEAH. Firstly, to prevent harm. SEAH causes lasting harm to individuals, communities, and reputational harm to HDP actors eroding trust in their effectiveness, integrity and accountability. Evidence has shown that SEAH is systemic, under-reported and deeply rooted in power differentials and gender inequalities. Risks increase as these power differentials are exacerbated by systemic shocks, such as humanitarian emergencies, conflict, food insecurity or displacement. Risks are aggravated by inconsistent programmatic focus on SEAH caused by insecure and short term funding models, budget cuts, early programme closures, and lack of resource allocation for SEAH experts.
5. Secondly, to provide an appropriate level of care and support to victim-survivors when SEAH occurs. Evidence currently shows that when SEAH occurs, victim-survivors are too often left in a difficult situation that negatively affects their integrity, health and well-being, and the trust that they and communities have in HDP actors. They have rights to assistance and to access accountability processes, and legitimate expectations around how they will be treated, listened to, and supported should they choose to report. But their journey through the PSEAH process

² [The Common Approach to Protection from SEAH \(CAPSEAH\)](#)

often falls far short of meeting those rights and expectations. Services for victim-survivors are chronically underfunded, not sustained or non-existent in contexts where the risk of sexual exploitation and abuse is highest. Evidence shows under-reporting is chronic and most victim-survivors do not come forward – when they do so, the capacity to carry out victim-survivor-centred care, response and investigations is limited. Better resourcing would contribute to fostering a more protective environment, reduce risk and strengthen prevention, better ensure victim-survivors' expectations are realised and help engender trust that reporting will lead to accountability and justice.

6. Further arguments that build a business case for investing in PSEAH include:

- **Impact and integrity:** acts of SEAH cause lasting and irreparable harm to individuals and communities. Organisations working in the HDP sectors must aim to ensure their interventions do not cause harm and are protective, accountable and empowering both for beneficiaries and for workers involved in their delivery. Allowing permissive SEAH environments, including by failing to meaningfully address harm when it occurs, enables and entrenches negative power dynamics, corruption and gender-based violence, undermining accountability and reinforcing socioeconomic factors which hold back global development, fundamentally undermining the impact of HDP work. Conversely, engaging individuals and communities on how to protect from SEAH can help start to unpick and tackle the root causes of gender inequality and support the development of contextually appropriate and inclusive prevention and response initiatives³.
- **Accountability:** All organisations and actors delivering HDP work bear responsibility for the quality, appropriateness and safe delivery of that assistance. Communities should expect assistance that does not impact negatively on them, with a means to hold actors and organisations to account when it does.
- **Effectiveness:** erosion of trust undermines the effectiveness and impact of HDP work. When individuals and communities perceive that organisations cannot protect them from harm or address misconduct within their ranks, it can lead to resistance, reduced access, and ultimately, a failure to deliver assistance to those who need it most. Conversely, effective transparency and accountability to individuals and communities can build trust and feedback channels to enhance delivery mechanisms.
- **Standards:** Complying with relevant norms, conventions and standards which mandate the protection of individuals from abuse, exploitation and harassment, demonstrates effective and competent operations, commitment to upholding human rights and ethical standards, and is a key component of risk management. Demonstrating compliance through effective audit and monitoring enables organisations to show they take their responsibility to protect against SEAH seriously.
- **Reputational:** Incidents of SEAH can have devastating effects on an organisation's reputation, leading to decreased public trust, reduced financing or the cancellation of projects⁴. Conversely, investment in PSEAH can protect and even enhance reputation, attracting funding and high calibre staff. They can generate trust in systems and potentially improve the reporting of incidents and the ability of an organisation to support victim-survivors.

³ For example, the World Bank Group Report [Gender-Based Violence Prevention and Response in World Bank Operations: Taking Stock After a Decade of Engagement](#) shows that systematic engagement on SEA/SH as part of the Environmental and Social framework has contributed, along with other things,) to a significant expansion of engagement on GBV prevention and response with their government partners.

⁴ For example, a World Bank inspection panel case in Uganda led to the cancellation of the project for contractual breaches related to workers' issues, social and environmental concerns, poor project performance, and serious allegations of sexual misconduct and abuse by contractors. Link to info on the case <https://www.inspectionpanel.org/panel-cases/transport-sector-development-project-additional-financing>. Statement on cancellation: <https://www.worldbank.org/en/news/press-release/2015/12/21/wb-statement-cancellation-uganda-transport-sector-development-project>

- **Risk:** Proactive investment in prevention and response mechanisms demonstrates accountability and mitigates risks to communities, staff, and operations. Failing to effectively manage SEAH risk increases legal, financial, safeguarding and performance risks (e.g. potential lawsuits, internal accountability and reputational damage).
 - **Financial:** PSEAH systems will need to be in place and be part of “the cost of doing business” for the foreseeable future given the systemic nature of SEAH and rising risks. In fact, it is better value-for-money to invest decisively now not only because it is the right thing to do, but also because it can save organisations the more substantial costs associated with investigations, legal proceedings, human resources actions, redress and remedies, and the cost of rebuilding trust and credibility with communities, partners, and donors. Under-resourcing PSEAH can have the adverse effects of being un/ill-prepared and durably affecting an organisation’s brand.
- 7. Recommendation:** *As a first step, we recommend that these arguments are more routinely used to make the case to leaders and actors engaged in HDP work to ensure PSEAH efforts are resourced sufficiently.*

The current investment picture

8. Investments in PSEAH have played a significant role in the progress made over recent years. The humanitarian, development and peace & security sectors now have established the foundations of a protective SEAH architecture with clear policies, standards and commitments, employee vetting schemes, due diligence mechanisms, staff training, community awareness and outreach, specialist technical and human resources, systems and funds to support victim-survivors.
9. Investments and funding mechanisms have however mainly been short-term and uncoordinated. This has undermined the cohesiveness and accountability of that architecture, with insufficient funding predictability and scale to meet needs, support a more transformative and decisive journey, and ensure long term sustainability. Some sectors are arguably more advanced than others e.g. PSEAH is a much newer frontier for development actors than for the humanitarian and peacekeeping sectors. Levels of funding also vary greatly across organisations and contexts. However, even in contexts with high SEAH risk and higher maturity in tackling SEA, significant funding shortfalls are consistently reported, including in the 15 highest SEA risk countries. As an example, in 2022 the total collective requirements for PSEA in the humanitarian sector were US\$14 million, representing only 0.35% of total humanitarian funding requirements. But PSEA efforts received less than US\$5 million, a third of what was needed⁵. This needs urgent attention - the risk of sexual exploitation and abuse has increased significantly during the past year, in proportion to an unprecedented rise in humanitarian crises around the world. In development contexts, PSEA requirements are even less articulated, organised and funded, with very little data on funding requirements and flows.
10. Investments have taken three main forms:
 - Support for collaborative, multi-stakholder, inter-agency and/or pooled programmes and initiatives at global or country level (e.g. [The Misconduct Disclosure Scheme](#), [Empowered Aid](#), the [Safeguarding Resource and Support Hub](#), [PSEA Capacity project](#), to name only a few) have helped fill unmet capacity needs, promote more collective action, and develop tools or mechanisms that did not previously exist.

⁵ See [IASC PSEA Global dashboard](#) and UNICEF 2022 Supplementary report: [UNICEF IASC PSEA Dashboard 2022 Supplementary Report.pdf \(interagencystandingcommittee.org\)](#).

- Support to mainstream PSEAH to ensure PSEAH is part of every programme, activity or service delivered to populations⁶.
 - Investments to improve PSEAH capability – e.g. investment in internal staff capacity, knowledge and skills, or those of implementing partners. Donors and funders have increasingly integrated requirements for risk identification, mitigation and response and often offered technical assistance and/or consultancy services to strengthen the PSEAH capacity of their partners.
11. The UN is currently undertaking a comprehensive review of its PSEAH financing model. This review will address several issues including one that has come up during our work, around whether, for investing in both agency-specific and inter-agency initiative, UN agencies require additional funding. This is something we have heard particularly at the country level. This challenge was often highlighted and further complicated by the fact that there is currently no set guidance around how much UN agencies should contribute to inter-agency initiatives (i.e. there is not cost-sharing agreement similar to security costs); costs can be disproportionately borne by mandated protection agencies. Several donors providing core (unearmarked) funding to the UN argue that it is less about additional funding than it is about prioritisation, expecting agencies to ensure they have sufficient capacity to tackle SEAH from core funds in the same way that they do for e.g. fraud.

What is needed?

12. Improved resourcing for PSEAH might be seen as costly and impossible thing to do at a time of stretched ODA budgets and a challenging funding landscape, particularly in the humanitarian sector. But the cost of the status-quo is likely to be much greater: As noted earlier, SEAH risks are increasing and a lack of sustained investment will curtail the ability of HDP actors to do meet SEAH standards and implement safe and effective programmes.
13. Our estimate is that key PSEAH investments at global and country level would probably be an extremely small fraction of ODA [see illustration in annex 1] yet, if formalized and effective, and backed by clear policy commitment and improved collaboration, would help accelerate and consolidate PSEAH efforts over the long term. There would need to be an agreed mechanism for tracking PSEAH spending though, if we are to monitor progress; this is not something for which there is clarity or consensus yet⁷.
14. Efficiencies, transparency and better collaboration are also needed. Resource pooling is currently insufficient. There are inefficiencies, duplication, gaps and the cost-effectiveness of some of the actions taken is not always clear. More funding will not, on its own, be enough. A new ‘compact’ between all funders, partners and recipients based on a transparent and open understanding of needs, that commits to more effective collaboration, clearer accountability, more systematic monitoring and evaluation of results and impact, transparency and dialogue is also critical to success.
15. Leadership and cultural change are critical. When leadership is absent or weak, too often PSEAH falls off the agenda, accountability is significantly undermined, and prevention and response actions are not taken, or critical issues remain unaddressed. HDP leaders at global, regional and country level should more systematically acknowledge SEAH risk exists, assume

⁶ PSEAH as part of programmes or projects has been mainly funded through earmarked, projectised funding, and/or as part of indirect and non-project attributable costs.

⁷ As part of the think piece we took a look at this and there could be at least 3 options, none of them providing the full picture: (i) making PSEAH a subset of the current OECD DAC gender marker (ii) creating a dedicated optional hashtag / code word similar to what was done for Covid 19, that OCED DAC members use when reporting ODA (iii) set up a project-based tracking system similar to UNOCHA FTS. Note that, in the humanitarian sector, there is also a proposal to IASC to allocate a % of humanitarian funding to women-led organizations. We can reasonably imagine some may be involved in PSEA actions.

SEAH is occurring and take more decisive action, and drive cultural change across their sector. This means more dedicated initiatives and visible and public commitment to PSEAH. It also means appointing sufficiently senior PSEAH managers and staff positions within an organisation to give the post-holder enough gravitas and power to undertake their work and drive change. Otherwise, and this is currently a key challenge, PSEAH post-holders will have to spend a disproportionate amount of time convincing internally on the value of their work and rallying leaders behind them.

16. We must also keep in view two related issues that are not strictly under the PSEAH remit but are critical to the effectiveness of any PSEAH action:

- Increased investments are needed for victim-survivor support services, with a priority on strengthening Gender Based Violence (GBV) services' funding, including to address the needs of children, LGBTQI communities, people with disabilities and other vulnerable groups. SEAH victim-survivors are often referred to GBV services for support and yet insufficient funding, lack of accessibility or poor capacity can result in them not getting the services they need or want. According to recent data, 1 out of 4 victim-survivors does not receive support or assistance because services are not available⁸, with considerable variations by region, country and area. In the humanitarian sector, only 23% and 25% of GBV funding needs were met in 2023 and 2024⁹.
- Given that SEAH risks are gendered (women and girls account for over 90% of victim-survivors, and men for over 90% of perpetrators, on average globally¹⁰), systemic and increasing, investments in addressing gender inequalities and in mitigation and prevention of GBV also play a vital underpinning role in helping prevent SEAH. But they remain too low: as an example (and acknowledging SEAH prevention does not entirely fall under GBV prevention) only 0.2% of overall aid and development funding was spent on GBV prevention in 2022. Over the five year period 2018-2023, it is estimated that donors have invested an average of \$USD 410 million per year in GBV prevention, which is not sufficient to deliver the required programmes and have impact¹¹.

Structure for investments

17. A structure for investments has taken shape over the last 5-10 years which we consider fit for purpose. It helps translate into practice existing commitments. We have assessed key gaps and where efficiencies are most needed, based on a Theory of Change approach (see annex 2). As noted above, as investments are made it will be key that we collectively strengthen linkages between PSEAH, GBV prevention and gender equality programming to maximize collaboration, efficiencies and impact.

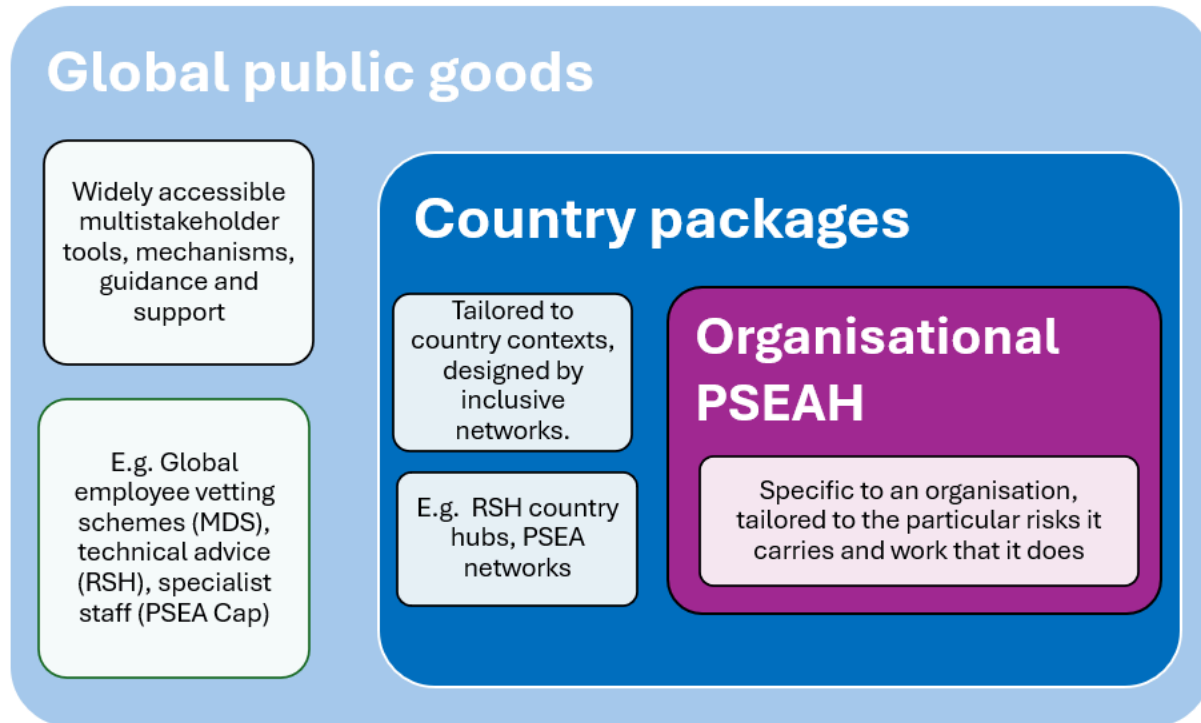
18. Progress on PSEAH requires investment at three levels:

⁸ See CHS data in "[Trends in Sexual exploitation, Abuse & Harassment in the Aid Sector: a six-month overview](#)" | CHS Alliance.

⁹ OCHA Financial Tracking Service.

¹⁰ Existing evidence shows that the majority of victim-survivors in reported SEAH allegations are female, accounting for over 90% of victim-survivors (94% on average in CHS data [Trends in Sexual exploitation, Abuse & Harassment in the Aid Sector: a six-month overview](#) | CHS Alliance covering October 2023-March 2024, 88% on average in I-Report data for [UN personnel](#) since 2017 and 87% on average in I-report data for [UN implementing partners' staff](#) since 2017). Most perpetrators are male (87% on average amongst perpetrators in [UN personnel](#) since 2017, 90% on average amongst perpetrators in [UN implementing partners' staff](#) since 2017, and 99% in CHS data [Trends in Sexual exploitation, Abuse & Harassment in the Aid Sector: a six-month overview](#) | CHS Alliance covering October 2023-March 2024).

¹¹ "What counts? The state of funding for the prevention of violence against women and girls", The Accelerator for GBV prevention, 2023.



- **Investment in PSEAH Global Public Goods¹²** – these are global initiatives that benefit all those working on SEAH in the HDP system, providing widely accessible tools, guidance and support across common areas of need. Investments are best made at global level as needs are on a global scale, a collective approach will provide greater efficiency and sustainability, and mechanisms or programmes already exist that can be harnessed or scaled up. Current examples include the Misconduct Disclosure Scheme (staff vetting), the PSEA Cap (PSEA inter-agency coordination), the global Safeguarding Resource and Support Hub, the Investigator Qualification Training Scheme (IQTS – investigation capability), and the Harmonised Data Reporting Scheme (improving data on SEAH).
- **Investment at the country level** – these are country-level initiatives that coordinate PSEAH action in country, identify priority tailored actions, remove duplication and drive efficiencies. Current examples include PSEA networks in humanitarian contexts, headed by a coordinator and working based on a collectively designed action plan, the UNICEF-led UN Government framework initiative, and financing instruments by the World Bank to advance SEAH prevention and response. This is where where the bulk of resourcing needs lie, and more effort is needed to enhance existing mechanisms, making them more transparent, sustainable, inclusive and cost-efficient, and to expand to development contexts.
- **Investments at the organisational level** – these are investments made HDP actors to support their PSEAH capacity and functions. They are meant to ensure that PSEAH activities are systematic, tailored and mainstreamed in both their internal operations and external programme/delivery.

19. Reflections on areas that require sustained or increased resourcing or efficiency in each of these three areas are set out below. Further consideration is required on how to better harness

¹² Definition: Public goods are 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”), International Monetary Fund, 2024, see [here](#).

existing global, regional and country funding mechanisms; this will be part of a next phase of work (see last section on 'next steps').

Global Public Goods

20. Investments at the global level have been made but critical resourcing gaps need to be filled in specific areas, and efficiencies made in others, to ensure a long-term sustainable global architecture for PSEAH. Investments should be made through delivery mechanisms that are inclusive of either all stakeholders, or benefit those with needs that are unmet.

21. Recommendations

- ✓ *Increased investments specific to PSEAH are needed at global level to improve collective learning and tools to:*
 - o *roll out a victim-survivor-centred approach,*
 - o *design effective risk mitigation plans using agile, participatory and locally-led approaches and tools,*
 - o *undertake regular independent reviews, at system-wide, region, country or organisational level, to learn, adjust and do better.*
- ✓ *Investments should be maintained and, in some cases, increased to further develop tools that provide guidance and support at a collective, multistakeholder, global level:*
 - o *Coherent international standards, due diligence and audit,*
 - o *Employee vetting schemes, which can be widely accessed and used*
 - o *Building global evidence and learning about PSEAH systems and mechanisms' effectiveness and efficiency.*
 - o *SEAH risk analysis, data and monitoring,*
 - o *Investigation capability, qualification and training, and technical peer-to-peer learning to constantly review and improve investigations' victim-survivor-centricity and quality,*
- ✓ *Greater efficiencies should be explored and systematised in other areas, such as:*
 - Greater alignment around capability assessment/verification and due diligence of core SEAH standards could avoid much duplication* (e.g. a pilot is exploring whether HQAI verification against the CHS PSEAH index can more effectively provide a 'passport' through PSEAH due diligence processes)
 - Community outreach and engagement initiatives that have delivered clear results and documented good practices should be taken to scale and lessons harnessed for global improvement* (e.g. from Empowered Aid and the ICVA-UNHCR Community Outreach and Communication Fund).
 - Improving reporting mechanisms, which are too often unfit for purpose, with insufficient reflection on their use and a lack of adjustive programming based on feedback from individuals and communities. More use should be made of the limited existing evidence on what works, and a global review could help strengthen the evidence base.*
 - Explore ways to consolidate and pool multiple training and capacity-building providers & packages to promote coherence, effectiveness and efficiencies. There should also be a closer and more systematic examination of what works best to not only raise awareness, build capacity and train, but also to durably change attitudes and behaviours at the individual and collective level.*

22. See Annex 2 for the RAG-rated Theory of Change that underpins the above prioritization.

23. There are also issues with potential to enhance global learning and approaches around which consensus is still developing, and conversations are ongoing. These include:

- **Prevention:** with increased risks and given the very systemic nature of SEAH, investments in prevention are critical. A [recent prevention study](#) showed that whilst prevention approaches vary, there are areas which have demonstrated effectiveness, and this provides much needed reflections on what a more transformative approach to prevention could consist of. The study also notes that whilst there are areas of investment that have demonstrated effectiveness, there is no evidence on what exactly offers the best value for money.

The CAPSEAH Resourcing working group will continue to unpack the prevention study's implications, including through the identification of several areas of potential testing and research on economies of scope, of scale, and returns on investment (which could, for example, be part of a global monitoring, evaluation and learning evidence-building initiative).

- **Response:** for example, a [recent think piece on reparations](#) shows that there is no consensus of who's the duty-bearer for providing reparatory justice to survivors and a current gap in policy and practice around the provision of redress remedies for harm caused by SEAH. The case for providing support and reparatory justice to victim-survivors of SEAH is strong. For example, it helps victim-survivors have the harm they have suffered acknowledged and their agency and dignity restored. It is also potentially an important method of holding organisations to account and incentivising PSEAH prevention.

The CAPSEAH Resourcing working group will continue to unpack this topic including through the potential design of an effective and fair approach for reparatory justice and thinking around innovative financing mechanisms such as insurance.

Country packages

24. Coherent investment at the country level is important to adjust actions to context, needs and feedback from individuals and communities, drive collective action, reduce duplication and other inefficiencies, and support learning and progress on PSEAH. Country packages should typically have a multistakeholder network committed to progress PSEAH that works to identify priority tailored actions, costs them, commits resources and drives efficiencies.
25. Country stakeholders and networks usually draw on Global Public Goods and complement them with country initiatives. For example, the Resource and Support Hub provides PSEAH guidance and support with a focus on CSOs and local and national NGOs, but that can be useful, relevant and adapted to other actors, including governments. Specific RSH country hubs develop tailored materials and approaches.
26. An existing model is the UN PSEA networks' action plans in humanitarian contexts. Analysis of existing plans shows that on average an action plan costs \$600,000 per year, with variations based on the size and complexity of the humanitarian response (30% of action plans are more than that, including 10% over \$1 million per year). However plans often are under-funded, and fund received are ad hoc, fragmented and unpredictable, preventing long term stability and sustainability. Where plans are fully funded (e.g. Afghanistan) this has been achieved through effective, sustained, multi-stakeholder engagement, buy-in, and coordination.
27. Another potential model could be explored through the UN Sustainable Development Cooperation Framework (UNSDCF), integrating PSEAH risk analysis into the required Common Country Analysis, through a National PSEA Review, to consider where sectoral policy

improvements and investments might be warranted through the UNSDCF planning and financing process.

28. Among IFIs, the World Bank is working with borrower countries on initiatives to strengthen country level environmental and social risk management systems and increasingly using a variety of financing instruments to strengthen SEAH and GBV prevention and response country-systems¹³.

29. Recommendations

- ✓ Invest in PSEA-CAP to ensure long term, sustainable, predictable PSEA Coordination. A pre-requisite for a successful country package is to have a PSEA coordinator who can head a PSEA network for at least 2 consecutive years and drive design, planning and action. The responsibility of PSEA coordination could be shared among UN entities at country level through rotation cycles. In humanitarian and high-risk contexts, the post-holder should be full-time given the high-pace and challenging contexts in which PSEAH work is undertaken. In development contexts this could be piloted, alongside complementary approaches, to test what works to strengthen PSEAH through the inter-agency UNSDCF national planning process with governments.
- ✓ Country packages should be more systematically tailored, costed, and funded through a mix of contributions by PSEA network members (in particular, those organisations that have access to unearmarked funding) and funders' contributions for key activities that underpin and support collective action (e.g. country risk analysis or review, investigators' pools, local or national vetting schemes).
- ✓ It is fundamental for country packages to deliver impact that they are based on the genuine inclusion of all stakeholder groups in the country, and that they tailor and target their actions based on a common understanding and analysis of SEAH risks, the role, value-add or mandates of different stakeholders (i.e. some actors will have influence with national governments/ministries, some will provide funding or technical assistance, others do front-line delivery etc.), lessons learned so far on what works and what doesn't, and clear mechanisms for monitoring, evaluation and adaptation. Note that there will be variations and adaptation between humanitarian and development contexts¹⁴.
- ✓ When there are common issues across most countries and regions, and emerging practices with promising potential or demonstrated results, these should look to be replicated and taken to scale. As an example, the creation of regional and country-based pools of qualified SEAH investigators could address the dearth of SEAH specific investigation capacity across the sector, enable aid sector actors to access much needed support, and improve accountability to survivors, through taking a survivor centred approach and learning from these in the different contexts. Thanks to global investment in SEAH investigation training, there is an increased potential to set up such pools in the next few years.

Organisational resourcing

30. Every HDP actor finances its PSEAH capability and activities in two main ways. It can access funds and technical resources internally, going through an internal process of approval e.g. seeking approval from its executive functions. This applies largely to actors that do not need external financing e.g. institutional donors, foundations, IFIs, large UN or international NGO with sizeable amounts of private funding. Actors can also seek and receive external financing, either earmarked or unearmarked, from donors and funders.

¹³ Examples include [Nepal Environmental and Social Framework Overview assessment](#).

¹⁴ This is something the resourcing working group will unpack in the next phase of its work.

31. Donors and funders are considered here to be any entity that finances another to implement programmes, projects and/or deliver services. They include institutional donors (i.e. government departments or aid agencies), global, regional or country funds, international financial institutions, trusts and foundations, UN agencies, international NGOs and, in fewer cases, national NGOs. These donors and funders hold significant power in the HDP system. By contrast some actors such as national NGOs and CSOs hold much less power and although they are on the frontline of service delivery and engage directly with individuals and communities, they currently are for the most part not well resourced to manage SEAH risks adequately.
32. The long-held view is that although commitments have been made to uphold PSEAH standards in every organisation, organisational PSEAH is very differently, unevenly and insufficiently financed.
33. A limited survey was undertaken by the FCDO to scope existing PSEAH organisational resourcing practices. It was open for a period of 3 months and 54 responses were collected. Key findings are below¹⁵.
- Not all organisations have a clear line in their overall organisational budget to support their internal PSEAH capability: almost half of the respondents said they did, and the other half did not. There was wide variation: stakeholder groups which the majority had a clear line were governments, UN agencies and INGOs. Those that most reported having no line were the private sector (all), NNGOs (half) and INGOs (a third).
 - When asked how much PSEAH funding was as a proportion of their overall organisational budget, just over half of respondents answered less than 1% with most of them allocating less than 0.5%. Almost 1 out of 4 respondents were unable to answer. There was often no way of tracking, hence accounting for, specific PSEAH expenses.
 - There was even split between resourcing PSEAH using funds from programme (earmarked), core (unearmarked), and overhead costs.
 - When asked why organisations would internally decide to cut or reduce funding for PSEAH, the most frequent reasons given included overall budget cuts or other institutional priorities. Positively, many respondents said PSEAH budgets were protected, and in some cases increasing.
 - When asked whether organisations include PSEAH budget lines in funding proposals to donors and funders, many stated that their decision depended mainly on context and their perception of whether donor would allow it. Uncertainty and lack of clarity on this, and reputational fear persist as key hindering factors especially amongst NGOs and the private sector.
 - Donors and funders provide support beyond funding, e.g. by signposting partners to existing initiatives or resources or providing technical advice. They also have a mixed approach to monitoring if and how resourcing PSEAH is cascaded down the delivery chain.
34. Recent evidence on overhead costs¹⁶ specifically shows that most funders provide inadequate coverage of their grantees' administration costs, which has significant negative organisational impacts. Safeguarding was the top organisational function identified as being most under-resourced. Inadequate cost coverage and limited access to unrestricted income is making it extremely challenging for most NGOs to achieve financial stability. To build financial

¹⁵ More detail is included in Annex 3.

¹⁶ Humentum research *Breaking the starvation cycle*, March 2022, accessible here : [Humentum-ACR-Research-Report-FINAL.pdf](#) and work by Development Initiatives on [Donor approaches to overheads for local and national partners](#)

resilience, the study recommends funders provide one or more of: a) full cost coverage b) means by which grantees can contribute to unrestricted reserves and c) support to strengthen grantees' cost recovery capabilities.

Recommendations

35. We are not advocating for policy standardisation on resourcing organisational PSEAH at this stage, but recommend further work is done to gather data and evidence on funding mechanisms to develop adaptive models, improve learning and practice.
36. *We do recommend some changes to current practices to help build evidence and learning on funding models and help embed improve resourcing at organisational and programme/project level:*
- *All organisations should:*
 - ✓ *ensure that they have PSEAH policies and approaches that match their operating environment and that these are backed up by sufficient resources over the long term*
 - ✓ *systematically have one or more clear budget lines in their organisational budget, covering of all necessary PSEAH costs e.g. staff and activities*
 - ✓ *use and join collective tools and approaches where available, to support collaboration, learning, maximise efficiency and reduce fragmentation and duplication*
 - ✓ *recognise that HDP actors have a shared responsibility to mobilise resources for PSEAH and explicitly cost their PSEAH activities to allow for a more open and transparent conversation to be had on this across donors/funders and implementing partners.*
 - *To all donors and funders:*
 - ✓ *Use and more transparently and coherently coordinate support for collective approaches (e.g. global public goods, country packages and inter-agency/systemic investments) and encourage implementing partners to use them.*
 - ✓ *Be clear with implementing partners (e.g. through due diligence process and/or capacity assessments) that they are expected to have sufficient, predictable, sustained resources necessary to prevent and respond to SEAH in their operations, whether you are providing grants or loans.*
 - ✓ *Be explicit about whether it is possible to have stand-alone PSEAH lines in budget proposals that come to you for consideration.*
 - ✓ *When providing grants and contracts:*
 - ✓ *Ensure overheads policies and practices provide grantees and partners with sufficient resources to manage risks, including SEAH risks, durably and robustly (i.e. try to avoid overall budget constraints that force de-prioritisation of PSEAH resourcing).*
 - ✓ *Ensure that where frontline partners include PSEAH in their administrative costs, those administrative costs are sufficiently funded, so they can have enough capacity to manage risks. If this is not possible, ensure PSEAH is adequately funded through a dedicated budget line.*
 - *To all organisations seeking funding from others:*
 - ✓ *More systematically budget to mainstream PSEAH across all operations and proactively explain rationale for it to leaders, donors and funders.*

- *To International Financial Institutions:*
 - ✓ *Ensure PSEAH is explicitly referenced or identifiable in Environmental and Social Frameworks and related guidance notes, to help unlock and embed financing for PSEAH.*
 - ✓ *Consider whether and how to leverage existing funds for PSEAH prevention and response e.g. Funds such as the World Bank Umbrella Facility for Gender Equality*
 - ✓ *When providing loans and other non-grant funding, consider what incentives you are creating so that PSEAH is financed properly, and consider technical assistance provision on PSEAH as an adjunct.*
 - ✓ *Ensure that PSEAH standards are covered and adequately budgeted in the due diligence process for loan approvals and financing agreements and cascaded to all layers of implementing partners.*
 - ✓ *Encourage borrowers to adopt clear policies including reporting and response mechanisms on PSEAH within their operations.*
 - ✓ *Provide capacity-building resources to help borrowers develop and strengthen their PSEAH frameworks and approaches.*
 - ✓ *Integrate regular monitoring and reporting on PSEAH-related risks and measures into loan agreements.*

Next steps

37. The CAPSEAH Resourcing Working Group will continue working for another year to further develop and socialise these ideas via existing SEAH communities of practice such as CAPSEAH, RSH, CHS Alliance, IASC, and across a wider network, including GBV Area of Responsibility, WROs/WLOs and survivors' organisations, as well as national governments, and donors and funders. FCDO will retain the secretariat and leadership function.
38. As part of CAPSEAH's ambition to be an 'anchor for dialogue', we will explore webinars and deep dives with key stakeholders to develop workable and sustainable solutions to the resourcing challenges outlined on this paper.
39. You are invited to comment on this paper through the [CAPSEAH website](#) or by emailing CommonApproach.PSEAH@fcdo.gov.uk.

Annexes:

1. **Illustrative estimate to support collective PSEAH action at global and country level,**
2. [Annex 2 – Theory of Change: see PDF.](#)
3. [Annex 3 – Organisational resourcing survey results: see power point.](#)

Annex 1

Illustrative estimate to support collective PSEAH action at global and country level

There is no systematic data available to accurately cost PSEAH action at global, country and organisational level so the below costing is approximate, based on partial data and reasonable assumptions.

These assumptions include:

- Current Global Public Goods’ architecture is preserved and scales up by 20%
- PSEA Cap scales up to 30 countries
- 50 country action plans or equivalent are fully funded at average action plan cost of USD 0.5 million a year (based on 2022 data)

This estimate does not include Organisational PSEAH. It only focuses on collective initiatives at global and country level.

The costs of GBV response and prevention, and VAWG prevention, are not included.

Headline summary (per year, in \$m)		
Category	Cost	Assumptions and comments
Global Public Goods	15.75	Current architecture with about 20% scale-up. Includes PSEACap in 30 countries.
Country Packages	25	50 action plans funded at \$0.5 million on average per country.
Total per year	40.75	<p>This represents under 0.02% of total global ODA in 2023 (US\$ 223.7bn¹⁷).</p> <p>The top ten donors giving dedicating 0.02% to collective PSEAH efforts would raise around £37m (on average £3.7m per year, with a pro-rata range from £1-10m).</p> <p>20 smaller donors dedicating \$200k per year (\$4m) would bring the total to \$41m and fund 20 PSEA coordinators for that year.</p>
Total for 5 years	203.75	

NB: Although ODA provided by OECD DAC Donor Governments is used as an example, institutional donors are not expected to fund it all. As explained throughout the think piece, part of these costs should be borne by and contributed to by agencies and organisations as a reflection of how much they prioritize PSEAH. We should also seek to drive efficiencies.

¹⁷ [Official Development Assistance - ONE Data & Analysis](#)