



HOW TO MANAGE A UN TRUST
FUND GRANT

**SECTION 6: MEETING SAFETY
AND ETHICAL REQUIREMENTS**

GRANTEE HANDBOOK

UN TRUST FUND TO END VIOLENCE AGAINST WOMEN

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SECTION 6: MEETING SAFETY AND ETHICAL REQUIREMENTS

Part 1: Prevention of sexual exploitation and abuse

All personnel from the grantee organization are expected to refrain from any conduct that would adversely reflect on the United Nations (UN) and must not engage in any activity that is incompatible with the aims and objectives of the UN or the mandate of UN Women. This is clearly stipulated in Article VI of the PCA. Therefore, it is imperative that ethical and safety risks are identified, monitored, managed or mitigated to ensure the manner in which personnel operate do not inadvertently or deliberately lead to harm.

In this regard, please note that **the UN has a zero-tolerance policy on sexual exploitation and abuse (SEA).**

1. 1 Defining Sexual Exploitation and Abuse

The UN defines sexual exploitation and abuse as follows¹:

(a) *Sexual exploitation* is 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;

(b) *Sexual abuse* means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual exploitation includes the following:

1. **Transactional sex** - The exchange of money, employment, goods or services for sex, including sexual favors other forms of humiliating, degrading or exploitative behavior. This includes any exchange of assistance that is due to beneficiaries of assistance
2. **Solicitation of transactional sex** - Requesting of transactional sex
3. **Exploitative relationship** - A relationship that constitutes sexual exploitation, i.e. 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

Sexual abuse includes the following:

1. **Rape** - Penetration –even if slightly- of any body part of a person who does not consent with a sexual organ and/or the invasion of the genital or anal opening of a person who does not consent with any object or body part.
2. **Sexual assault** - Sexual activity with another person who does not consent. It is a violation of bodily integrity and sexual autonomy and is broader than narrower conception of “rape”, especially because:
 - a) it may be committed by other means than force or violence and
 - b) it does not necessarily entail penetration
3. **Sex with minor** - Sexual penetration of a person younger than 18. Sexual penetration includes the penetration of the vagina, anus or mouth by the penis or other body part and also includes penetration of the vagina or anus by an object. Sexual penetration of a child is prohibited regardless of the age of majority or consent locally and is considered as sexual abuse. Mistaken belief in the age of a child is not a defense.

¹ [Secretary General's Bulletin, 9 October 2003 on "Special measures for protection from sexual exploitation and sexual abuse" \(ST/SGB/2003/13\).](#)

4. **Sexual activity with a minor** - Sexual activity with a person younger than 18. All sexual activity with a child is prohibited regardless of the age of majority or consent locally and is considered as sexual abuse. Mistaken belief in the age of a child is not a defense.

1.2 UN Trust Fund Obligations

This section outlines the UN Trust Fund's obligations when working with implementing partners to ensure adequate safeguards and appropriate action related to sexual exploitation and abuse (SEA).

- The UN Trust Fund may assess the capacity of the implementing partner to prevent or to mitigate risks of SEA. This includes the following:
 - ✓ Requesting the partner to describe reporting and monitoring mechanisms in place.
 - ✓ Confirming that reference and background checks for partner personnel have been completed.
 - ✓ Requesting and reviewing partner's reporting procedure.
 - ✓ Confirming in writing that the partner is informed of the UN zero tolerance policy on SEA, and related UN agency, funds and programmes policies on SEA.
 - ✓ Requesting the partner to disclose any past allegations and outcomes.
- If a grantee organization is assessed as having weak capacity to prevent or to mitigate risks of SEA, the UN Trust Fund will implement appropriate risk mitigation measures. This includes requiring the partner to institute reporting procedures for SEA allegations for employees, contractors/sub-implementing partners and beneficiaries within one year of the grant award.
- If a grantee organization plans to sub-contract activities to another entity, the UN Trust Fund may require also require the grantee to ensure its partner has the necessary reporting and monitoring mechanisms in place to prevent and respond to allegations and incidents of SEA.
- The UN Trust Fund shall ensure that grantee personnel working on the UN Trust Fund projects have access to the UN PSEA training, or equivalent. The UN PSEA online training that is available for all implementing partners at: <https://agora.unicef.org/course/info.php?id=7380>.

1.3 Grantee Requirements

The UN Trust Fund requires its partners to demonstrate an active commitment to the values, principles and approaches outlined below:

- UN Trust Fund partners must be committed to the prevention of Sexual Exploitation and Abuse.
- They should have internal complaints procedures for reporting allegations of SEA.
- They should have proper measures for investigating allegations of SEA without delay.
- They must take disciplinary action against perpetrators of SEA.
- Failure to comply with the above standards will result in action being taken which can include severing ties with non-compliant partners.

! It is the responsibility of grantee organization to report allegations of SEA to UN Women, as part of its reporting obligation, where such allegations arise in the context of implementing the UN Trust Fund project. The UN Trust Fund does not partner with entities that fail to address SEA through appropriate preventive measures, investigation and

corrective action. Such failures shall constitute grounds for the termination of the funded project by the UN Trust Fund.

In addition, each grantee organization is required to do the following:

- ✓ Properly screen staff for involvement or alleged involvement in SEA or violations of human rights.
- ✓ Have reporting procedures in place for SEA allegations for employees, contractors/sub-implementing partners and beneficiaries.
- ✓ Ensure its co-implementing partners (those receiving a portion of the UN Trust Fund grant) also have the necessary reporting and monitoring mechanisms in place to prevent and respond to allegations and incidents of SEA.
- ✓ Ensure staff engaged with the UN Trust Fund grant have completed UN PSEA training, or equivalent.

Part 2: Project-related safety and ethical concerns

2.1 Introduction

Projects working on violence against women can lead to ethical and safety risks for both project staff and beneficiaries. For example, when asking questions about violence, respondents may not want to respond and may refuse to help the grantee organization with data collection. Respondents have **the right to refuse participation** in project activities and data collection and it would be ethically wrong to push the respondent to answer. Likewise, project activities and data collection on issues of violence can lead to risks of retaliation from perpetrators and even community members who may not agree with the project's aims. Steps must be taken to manage and mitigate these risks to ensure no harm comes to project staff or beneficiaries.

As per Article XVII of the PCA, *“the responsibility for the safety and security of the NGO and its personnel and property... rests with the NGO”* and it stipulates that *“the NGO shall put in place an appropriate security plan”*. This must include considerations of safety and security during project activities and the inherent risk of working in the field of violence against women. In practice this means the UN Trust Fund requires grantees to have *ethical, safety and security protocols and plans* in place not only to protect personnel and property, but also for risky project, data collection, monitoring and evaluation activities (i.e. **all risky activities described in the Project Document**).

Furthermore, given that personnel are expected to have the required qualifications, competencies and skills to complete the Project Document, UN Trust Fund expects grantee personnel (including consultants) to have experience in working on Violence Against Women (VAW) which must include knowledge of ethical and safety risks and how to mitigate these. This is especially important when working with children and survivors of violence. **The grantee will be expected to provide evidence that the organization has – or can – design specific protocols for working with these groups of beneficiaries.**

2.2 Examples of ethical and safety risks

For example, please consider these scenarios/examples at different stages of the project:

2.2.1. During project planning/design:

- Identifying project participants, some of whom could be survivors of violence, can put women at risk if identification is not done sensitively – how will you ensure confidentiality?

- Talking about issues of violence in some communities can be taboo – how will you introduce the subject without risking retaliation or backlash against project staff?

2.2.2. During project implementation:

- Project activities could include discussions on sensitive topics (such as personal experiences of violence) – how will you ensure there is privacy for staff and participants to ensure open discussion?
- Activities relating to sensitive subjects such as experiences of violence can re-traumatize survivors - what support will you offer to help anyone in need?

2.2.3. During project monitoring and data collection:

- Collecting data on incidence of violence may appear sensible for projects working on this subject, but does your organization have the experience to do so safely, to avoid the risks noted above? Conducting surveys on violence requires specialist training.
- Personal information on project participants can put people at risk if it is inadvertently disclosed. How will you monitor project participants without risking confidentiality? How will you record and store the data?

2.2.4. During project evaluation:

- Are you considering a “Randomized Control Trial” evaluation that involves monitoring the absence of project activities in a “control” community that will not benefit from the programme? If so how will you handle the ethical risks of not offering services in this community?

2.3 Ethical and safety principles to follow

Here are 10 key principles to follow when considering ethical and safety risks, which have been adapted from the World Health Organization’s [“Ethical and safety recommendations for intervention research on violence against women”](#) (2016) and the WHO’s [“Putting women first: Ethical and safety recommendations for research on domestic violence against women”](#) (2001).

Project activities:

1. **The safety of project staff, beneficiaries and partners is paramount** in all project, data collection, monitoring and evaluation activities – safety should guide all project decisions.
2. **Respect: violence against women is a violation of trust – do not replicate this in your work / data collection** – you must get informed consent from all project participants.
3. **Parental consent is necessary if you are working with children** (as well as the child’s informed consent) – even if you are working through schools – ensure you know the rules in your country in this regard.
4. **Protecting confidentiality is essential to ensure everyone’s safety and data quality.** This includes the physical and digital protection of any data stored by your organization.
5. The design of project interventions, data collection, monitoring and evaluation activities must include actions aimed at **reducing any possible distress** caused to participants/beneficiaries.
6. All project team members and/or contractors involved in the project that may work directly with women at risk or survivors must be trained to **refer women requesting assistance to available local services and sources of**

support. Where few resources exist, it may be necessary to create support mechanisms or re-design the activity.

7. **All project team members and/or contractors involved in the project, data collection, monitoring and evaluation activities must be carefully selected** based on their qualifications and experience working in the field of EAW and/or receive specialized training and support (for example on interviewing survivors).

Data collection on violence:

8. **Any studies and research on VAW must be methodologically sound** and build on current research experience.
9. **Organizations involved in collecting data and information on the issue of VAW from beneficiaries have an ethical obligation to ensure the findings are properly interpreted and used** to advance policy or programming. If you won't use the information don't collect it!
10. Violence questions should only be incorporated into surveys designed for other purposes when ethical and methodology requirements can be met. **If you do not need to ask a sensitive question – don't!**

2.4 The safety of project staff, beneficiaries and partners

The physical safety of project staff, beneficiaries and project participants and partners from potential retaliatory violence by the perpetrator or perpetrators is of prime importance. For example, if you plan to ask community members questions about domestic violence or plan to implement activities to prevent violence and this becomes known - either within a household, or among the wider community - a perpetrator may find out about the topic and retaliate. For women experiencing violence, the mere act of participating in a survey may provoke further violence or place the respondent or the interviewer /project team at risk. Therefore, you must consider:

- Are there any possible risks to introducing the project or monitoring and evaluation (M&E) activity in the project site or community? Will the topic be a sensitive subject that could provoke retaliation?
- How will you design project or M&E activities to prevent this risk?
- Could identifying or inviting participants for your project or M&E activities inadvertently provoke risks – for example if you plan to work with survivors of violence how will you identify these beneficiaries whilst ensuring confidentiality?

Tips can include:

Some organizations deliberately design project activities to be framed in a different, less sensitive manner – for example a survey on domestic violence could be called a “study on women’s health and life experiences”. Project activities about “prevention of violence” could be included in activities around women’s rights and health, to encourage participation with less risk.

Having said that, the woman, as the subject and beneficiary of the project or M&E activity, needs to give full informed consent. Thus, the participants need to be fully informed about the nature the activity during the initial consent procedure, including the sensitivity of the topic. Likewise, if you plan to interview participants for your M&E activities about violence, the interviewer should introduce any section enquiring about violence carefully, forewarning the respondent about the nature of the questions and giving then the opportunity to either stop the interview, or not to answer these questions.

Consider the location of your project and M&E activities – ensure privacy if needed. If you plan to conduct awareness

raising sessions for women on the issue of violence, should this be held in a private location where other community members cannot overhear? If interviewing beneficiaries this should be conducted only in a private setting. The participant should feel free to reschedule (or relocate) the interview to a time (or place) that may be more safe or convenient for her.

Logistical planning for your project activities must include considerations of participant safety. This will require that the study's budget anticipate the likely need to re-schedule some activities if risks arise. It should also include advance identification of additional locations (such as a local health center) where activities can be conducted if women so desire.

Logistical planning and budgeting should also consider the safety needs of project staff or contractors hired to conduct activities. To ensure safety, it may be necessary for staff to travel in pairs, to carry mobile phones, to use designated means of transport/drivers or to assign a trusted escort to accompany teams into certain neighborhoods known to be unsafe for women alone. This is particularly true in circumstances where activities may have to conduct interviews in the evenings.

2.5 Protecting confidentiality

Information provided by project participants or respondents in data collection can be extremely personal. The dynamics of a violent relationship are such that the act of revealing details of violence to someone outside the family could also provoke another violent episode. **For these reasons, the confidentiality of information collected during a survey or from in-depth interviews with survivors of violence is of fundamental importance.** Several mechanisms should be used to protect the confidentiality of the information collected, including:

- All project and M&E staff should receive strict instructions about the importance of maintaining confidentiality. This must also be addressed in their training.
- No names should be written on project documentation and questionnaires (if it is sensitive information) unless consent has been provided.
- Instead, unique codes should be used to distinguish individuals. Where identifiers are needed to link a questionnaire or project record with the household location or respondent, they should be kept separately from the record, and upon completion of the activity, destroyed.
- Participants should be informed of confidentiality procedures as part of the consent process.
- Where tapes are made of in-depth interviews with survivors of violence, these should be kept in a locked cabinet with limited access and erased following transcription. The permission of the respondents should be sought before taping. Again, no record of the name of the women interviewed should be kept and women should be informed of who will have access to the tapes and for how long they will be kept.
- Although photographs of women can be a powerful and emotive way of communicating about domestic violence, care should be used when using this form of documentation. Women should be asked specifically whether photographs may be taken and shown and must agree to this as part of the informed consent process. They should be informed of how and where the photographs will likely be shown or displayed.

2.6 Actions aimed at reducing any possible distress caused to participants (or traumatization)

If you will be working directly with women at risk of violence and/or survivors, active efforts must be made to minimize any possible distress caused by project activities. Violence is a sensitive and stigmatized issue, and women are often blamed for the violence they experience. For example:

- ❑ All questions and discussions about violence and its consequences should be asked in a supportive and non-judgmental manner. In addition, care needs to be taken to ensure that language used cannot be interpreted as being judgmental, blaming or stigmatizing.
- ❑ As noted above, there is some evidence that many women find that talking about their experiences of violence is beneficial. Nevertheless, the respondent may recall frightening, humiliating or extremely painful experiences, which may cause a strong emotional reaction.
- ❑ Project staff and M&E staff and contractors therefore need to be trained to be aware of the effects that the questions or discussions may have on the informant and how best to respond, based on the woman's level of distress.
- ❑ Some women may become emotional during project activities, but still choose to proceed after being given a moment to collect themselves. Staff training should include practice on how to terminate a project activity or interview if the impact of the questions or activity becomes too negative.
- ❑ All interviews and project activities should end in a positive manner reinforcing women's own coping strategies and reminding her that the information she has shared is important and will be used to help other women.
- ❑ Likewise, project and M&E staff and contractors should affirm that no one deserves to be abused and inform the respondent of her rights under the law.

Project and M&E staff should be trained to refer women requesting assistance to available local services and sources of support. Where few resources exist, it may be necessary for the study to create short-term support mechanisms.

It is important that project and M&E staff anticipate and be prepared to respond appropriately to women who may need additional assistance during or following a project activity or interview. If you are working directly with survivors and women at risk, you must:

- ❑ Identify the potential providers of support in the community, which may include existing health, legal and social services and educational resources in the community, and less formal providers of support (including community representatives, religious leaders, traditional healers and women's organizations).
- ❑ Discussions should be held to obtain providers' agreement to assist and to identify the forms of support that each is able to provide.
- ❑ A list of resources should then be developed and offered to all respondents, irrespective of whether they have disclosed experiencing violence or not.
- ❑ The resource list should either be small enough to be hidden or include a range of other services so as not to alert a potential perpetrator to the nature of the information supplied.
- ❑ Where few resources exist, it may be necessary to have a trained counsellor or women's advocate accompany the project activities or interview teams and provide support on an "as needed" basis.
- ❑ Generally, this can take the form of alerting participants that a staff person trained in counselling for women's and/or violence issues will be available to meet with anyone who needs it or is interested at a set time and place. Preferably this location should be a health center, church or local organization where women can easily go without arousing suspicion.

If you are not able to identify or provide this kind of support, you may need to redesign your project activities to be less likely to lead to ethical and safety risks. Consider this scenario – if you inform a woman about her rights to leave a violent relationship but there is nowhere to escape to, how will your organization handle this?

2.7 Selection of project team members and/or contractors

All project team members and/or contractors involved in the project, data collection, monitoring and evaluation activities must be carefully selected based on their qualifications and experience working in the field of EAW and/or receive specialized training and support (for example on interviewing survivors). Ideally this would include:

- A basic introduction to issues of VAW and an overall orientation to the concepts of gender, and gender discrimination/inequality.
- The training must provide a mechanism for project and M&E staff to confront and overcome their own biases, fears and stereotypes regarding survivors. Some staff may have internalized the “victim-blaming” attitudes that permeate the culture at large - a reality that is likely to undermine their ability to work with women at risk and survivors.
- In addition, training should include an opportunity for staff to come to terms with their own experiences with violence. The high prevalence of violence against women worldwide means that it is very likely that one or more staff members will have been a direct target or have familial experiences of violence.
- Even when a staff member has not experienced violence, listening to stories of violence and abuse, may be draining and even overwhelming.
- During the training process it is important that the subject of violence is openly discussed, and that staff members are given the option of withdrawing from the project without prejudice.
- During project activities, regular debriefing meetings should be scheduled to enable the staff to discuss what they are hearing, their feelings about the situation, and how it is affecting them. These meetings should aim to reduce the stress of the work and avert any negative consequences.
- Project staff should have access to the same mechanisms and list of support services to project participants

2.8 What do you need to prepare to prevent ethical and safety risks?

Organizations funded by the UN Trust Fund must provide – **within the first six months of the project’s start date** – evidence of relevant safety and ethical protocols for data collection and project activities.

For example:

- MANDATORY: Overarching ethical and safety protocols** for your organization must be in place within six months – for example a summary of your organizational commitment to preventing ethical and safety risks, your principles and generic background on how you approach the issue.
 - ✓ These protocols may be reviewed by the UN Trust Fund for compliance with the above standards and to assess whether the organization has the capacity to mitigate and manage ethical and safety risks.
- It is also best practice to develop individual ethical and safety protocols for project and M&E activities, especially** tools that are intended to focus on collecting sensitive information from **women and girls at risk of violence or survivors of violence** and any activities **with children / minors** (18 years or younger). **such as:**
 - Protocols for identifying project participants safely (especially if survivors or women at risk)
 - Protocols for referring project participants and/or staff to support services if needed

- Protocols for protection and confidentiality of data collected on personal / sensitive subjects
- Protocols for gaining parental consent if working with children (including consent forms)
- Protocols for conducting interviews and focus group discussions when collecting data on sensitive subjects.

These protocols should include specific scripts (text) that project/M&E staff will read aloud to project participants to explain the project's purpose, or the purpose of the M&E activity, and seek the participants informed consent to participate. Example data collection tools and safety and ethical protocols can be accessed on the [Grantees Space](#).

3 Further resources

- ❑ **Researching Violence against Women: A Practical Guide for Researchers and Activists** WHO and PATH. (2005) <http://www.who.int/reproductivehealth/publications/violence/9241546476/en/>
- ❑ **Putting Women First: Ethical and Safety Recommendations for Research on Domestic Violence** WHO. (2001) Violence. http://www.who.int/gender-equity-rights/knowledge/who_fch_qwh_01.1/en/ Available in French and Spanish.
- ❑ ***Ethical and safety recommendations for intervention research on violence against women - Building on lessons from the WHO publication: Putting women first: ethical and safety recommendations for research on domestic violence against women (2016).*** <http://www.who.int/reproductivehealth/publications/violence/intervention-research-vaw/en/>