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Summary report on the strategic evaluation of WFP's work on protection from sexual exploitation and abuse

Executive summary

A strategic evaluation of WFP's work on protection from sexual exploitation and abuse between March 2017 and October 2023 was commissioned by the Office of Evaluation.

Sexual exploitation and abuse is a serious risk to the people WFP seeks to serve, a violation of humanitarian principles and a serious ethical and reputational risk for WFP. It results from power imbalances between aid providers and communities, leading to an increased risk of sexual exploitation through transactional sex and survival sex – particularly in contexts where aid programming is scaled up or down.

The evaluation assessed WFP's norms and standards, the effectiveness of its practices, coherence across partnerships and the enabling and hindering factors surrounding its activity on protection from sexual exploitation and abuse. It also explored WFP's readiness to adapt to medium-term challenges. Sexual harassment, investigations and case management were outside the scope of the evaluation.

The evaluation found that, overall, and despite limited human and financial resources, WFP, particularly through the Ethics Office and a committed network of focal points globally, has made significant progress in delivering on its protection from sexual exploitation and abuse commitments since 2018. An update of its commitments in 2023 brought WFP more in step with international standards and provided a clear statement of its institutional commitment to the issue. Capacity and guidance have increased and WFP has significantly increased its engagement in inter-agency partnerships on protection from sexual exploitation and abuse.

However, WFP has yet to translate its pledges for zero tolerance for inaction and a victim-centred approach into clear, actionable and resourced commitments that staff fully understand and can

In line with WFP's 2022 evaluation policy (WFP/EB.1/2022/4-C), to respect the integrity and independence of evaluation findings the editing of this report has been limited and as a result some of the language in it may not be fully consistent with the World Food Programme's standard terminology or editorial practices. Please direct any requests for clarification to the Director of Evaluation.

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rally behind. Moreover, it has yet to embed an understanding of sexual exploitation and abuse risk across contexts, transfer modalities and partnership types into programme design – particularly in relation to protection from sexual exploitation and abuse. Channels for reporting on protection from sexual exploitation and abuse are not yet sensitive to the barriers experienced by the most vulnerable people that WFP serves, and beneficiary feedback mechanisms do not yet engender confidence that channels are safe for victims or provide an appropriate level of accountability. Clarity is needed on victim support measures, as well as on the victim-centred approach, and WFP has scope to utilize its cluster leadership and cash-based transfer roles for more effective positioning on protection from sexual exploitation and abuse.

Given resource reductions and accordingly increased vulnerabilities in communities, WFP is carrying significant exposure to sexual exploitation and abuse risk. With adequate investment and visible commitment from leadership, however, WFP can play a transformative role in protection from sexual exploitation and abuse within the humanitarian system. To realize this potential, the evaluation highlights that there is an urgent need for WFP to understand the operational risk presented by sexual exploitation and abuse and to integrate protection from sexual exploitation and abuse more systematically across the organization.

Three immediate steps are recommended to address current sexual exploitation and abuse risk exposure: establish a task force and implementation plan to operationalize the 2023 Executive Director's circular on Special Measures for Protection from Sexual Exploitation and Sexual Abuse; commit human and financial resourcing for protection from sexual exploitation and abuse; and use the Inter-Agency Standing Committee championship to enhance leadership and culture for protection from sexual exploitation and abuse. In addition, three medium-term steps are recommended to enhance the visibility, attention and cross-organizational response to protection from sexual exploitation and abuse: develop a policy on protection from sexual exploitation and abuse; enhance links between risk assessment and programming; and reinforce United Nations inter-agency efforts on protection from sexual exploitation and abuse.

Draft decision*

The Board takes note of the summary report on the strategic evaluation of WFP's work on protection from sexual exploitation and abuse (WFP/EB.A/2024/7-B) and management response (WFP/EB.A/2024/7-B/Add.1) and encourages further action on the recommendations set out in the report, taking into account the considerations raised by the Board during its discussion.

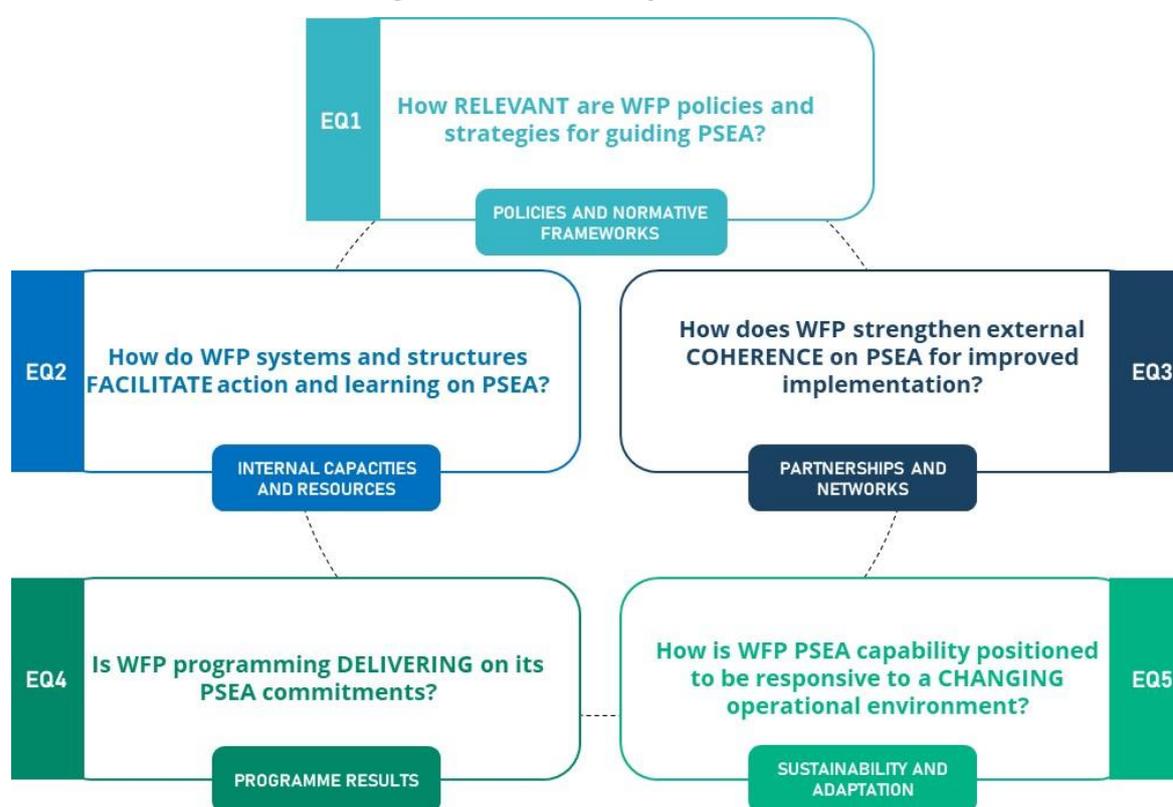
* This is a draft decision. For the final decision adopted by the Board, please refer to the decisions and recommendations document issued at the end of the session.

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):

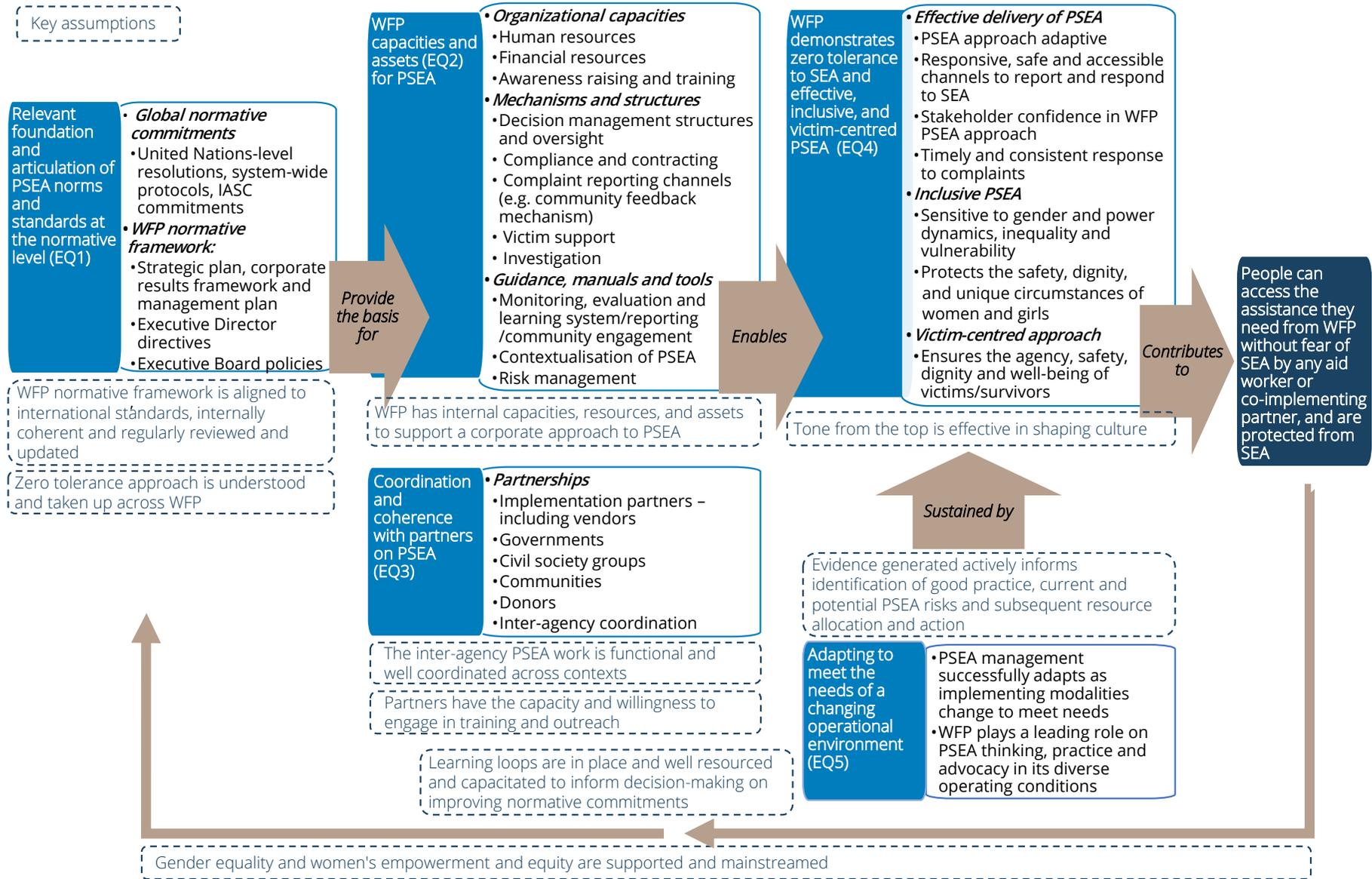
Figure 1: Evaluation questions



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.

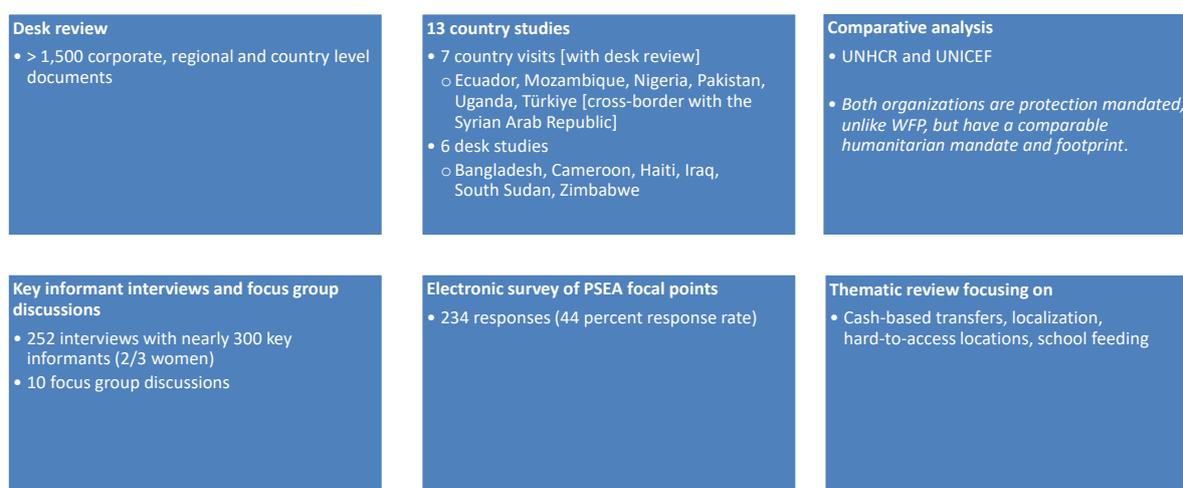
Figure 2: Logic model



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

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

coping strategies such as transactional and survival sex, with potentially grave consequences for beneficiaries and partners and for WFP corporately.²

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.

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.

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.

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.

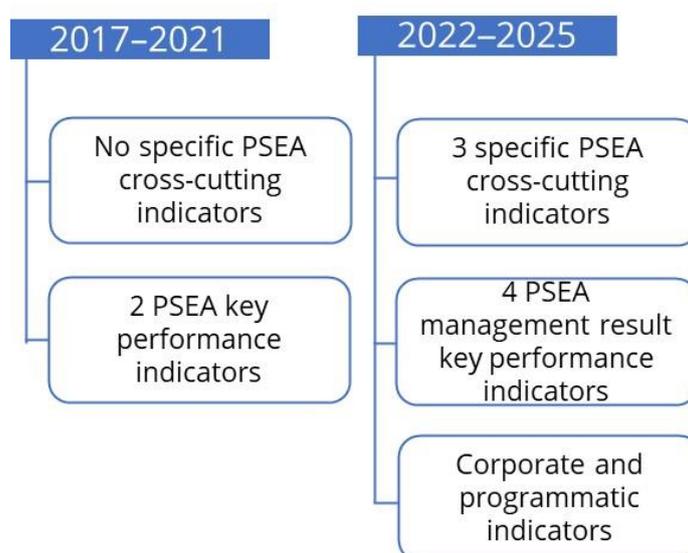
³ A total of 532 focal points according to the PSEA focal point survey email list provided by the Ethics Office.

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.

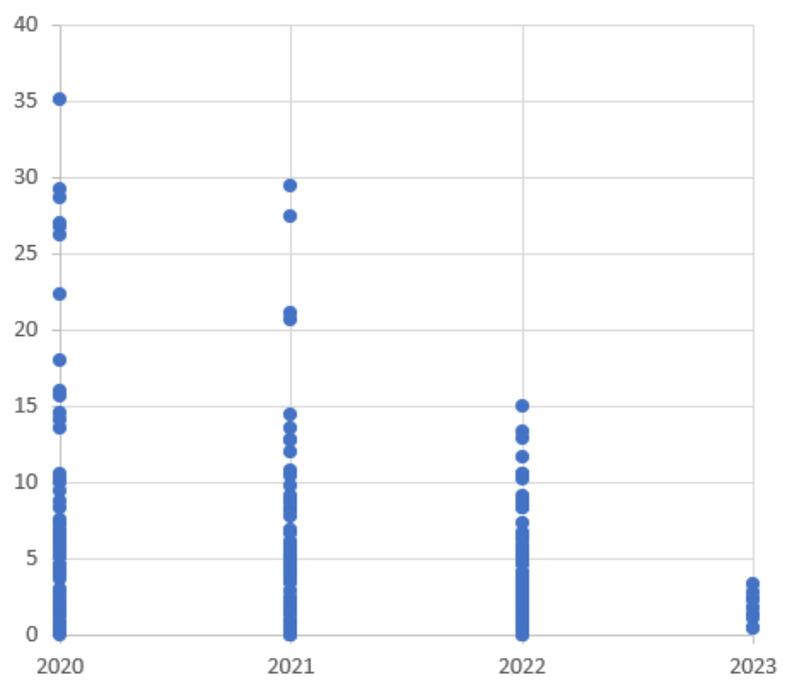
36. **WFP has not yet fully realized its leadership capacity for PSEA across the cluster system.** WFP has not yet maximized its leadership of the logistics and emergency telecommunications clusters or co-leadership of the food security cluster to broaden awareness of SEA risk and PSEA compliance among 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.

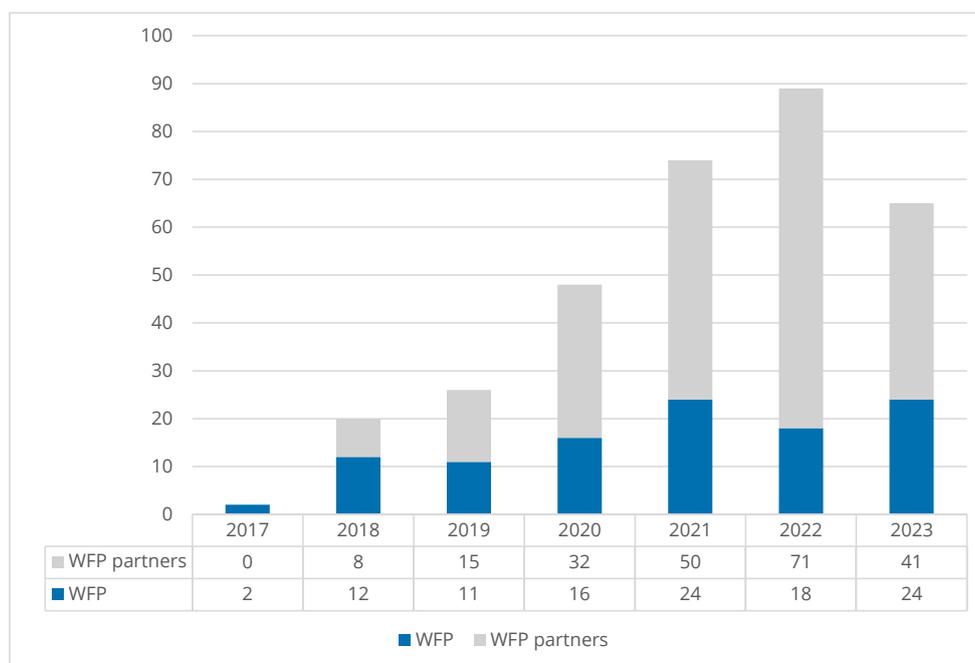
Figure 5: Sexual exploitation and abuse investigations turnaround time (in months) for substantiated cases, 2020–2023



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).

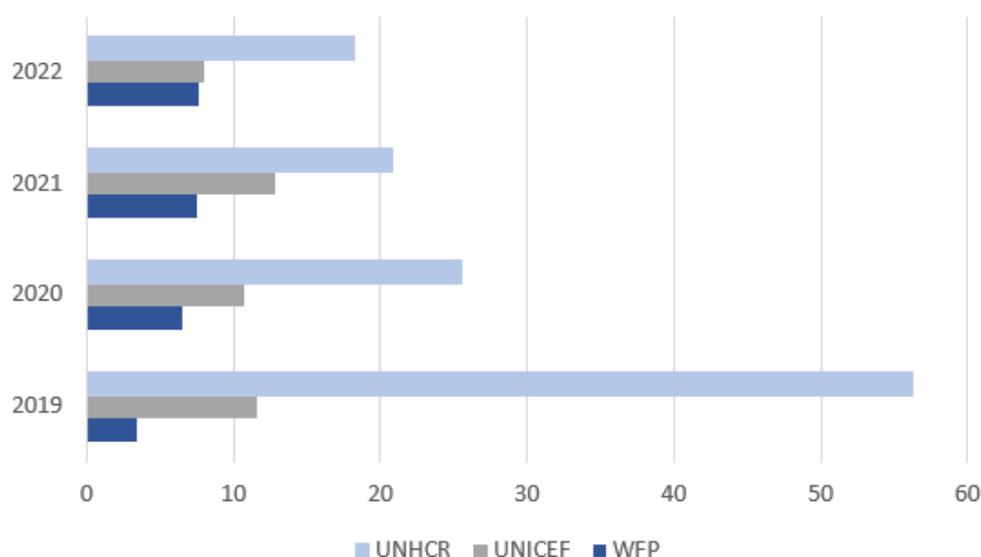
Figure 6: Sexual exploitation and abuse allegations against WFP and partner staff (2017–2023)



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 “zero tolerance 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, Emergencies 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; analysis of the sufficiency of existing materials and identification of gaps; 	Ethics	Gender, Protection and Inclusion, Risk Management, Programme Delivery, Emergencies Coordination, Programme Operations Department, Legal, Inspections and Investigations, Human Resources, Ombudsman, Communications and Media,	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 organizational changes introduced at WFP in February 2024, recommendations have been allocated to relevant capacitated divisions under the new structure, with senior leadership tasked with ensuring full responsibility and oversight for PSEA going forward.

	No.	Recommendation	Responsibility	Other contributors	Priority	Deadline
		<ul style="list-style-type: none"> 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. 		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
	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

	No.	Recommendation	Responsibility	Other contributors	Priority	Deadline
	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
	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

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
	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; 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. 	Ethics	Programme Delivery; Gender, Protection and Inclusion	Medium	2026

	No.	Recommendation	Responsibility	Other contributors	Priority	Deadline
PROGRAMMING AND OPERATIONS						
MEDIUM-TERM	5	Enhance the links between SEA risk assessment, programme design and implementation.	Programme Operations Department			
	5.1	<p>Integrate SEA risk assessment into WFP's operational instruments and procedures so that it becomes an automatic part of WFP's work.</p> <p>Critical aspects include:</p> <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 private sector, financial service providers, third-party monitors, standby partners and others to ensure effective PSEA.	Gender, Protection and Inclusion	Ethics; Risk Management; Delivery Assurance Service; Programme Policy and Guidance; Analysis, Planning and Performance; Supply Chain and Delivery	Medium	Second quarter of 2025

	No.	Recommendation	Responsibility	Other contributors	Priority	Deadline
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, Emergency Preparedness and Response	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	Emergency Preparedness and Response; Ethics	Medium	Fourth quarter of 2025

Acronyms

CFM	community feedback mechanism
CSP	country strategic plan
IASC	Inter-Agency Standing Committee
NGO	non-governmental organization
OIGI	Office of Inspections and Investigations
PSEA	protection from sexual exploitation and abuse
PSEAH	protection from sexual exploitation and abuse and sexual harassment
SEA	sexual exploitation and abuse
UNHCR	Office of the United Nations High Commissioner for Refugees
UNICEF	United Nations Children's Fund
VCA	victim-centred approach