

BANGLADESH

SEXUAL EXPLOITATION AND ABUSE (SEA)

RISK ASSESSMENT REPORT

Findings from the Inter-Agency Risk Assessment on SEA (IARA SEA)

Initiative of the Bangladesh Inter-Agency PSEA Network

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ACRONYMS

AAP-CE	Accountability to Affected Populations - Community Engagement
APBn	Armed Police Battalion
CCCM	Camp Coordination and Camp Management
CERF	UN Central Emergency Response Fund
CFM	Complaints and Feedback Mechanism
CiC	Camp in Charge
CoC	Code of Conduct
CP	Child Protection
EPR	Emergency Preparedness and Response
FCDO	Foreign, Commonwealth and Development Office
FGD	Focus Group Discussion
GBV	Gender-Based Violence
HC	Humanitarian Coordinator
HCT	Humanitarian Country Team
HNO	Humanitarian Needs Overview
HR	Human Resources
HRP	Humanitarian Response Plan
IARA	Inter-Agency Risk Assessment
IASC	Inter-Agency Standing Committee
IDP	Internally Displaced Persons
INGO	International Non-Governmental Organization
IOM	International Organization for Migration – UN Migration
IP	Implementing Partner
ISNA	Inter-Sector Needs Assessment
JRP	Joint Response Plan
KAP	Knowledge, Attitudes, and Practices



KII	Key Informant Interview
MoLE	Ministry of Labour and Employment
MOU	Memorandum of Understanding
MoWCA	Ministry of Women and Children Affairs
MSNA	Multi-Sector Needs Assessment
NGO	Non-Governmental Organization
OCHA	United Nations Office for the Coordination of Humanitarian Affairs
PSEA	Protection from Sexual Exploitation and Abuse
RC	Resident Coordinator
RRRC	Office of the Refugee Relief and Repatriation Commissioner
SEA	Sexual Exploitation and Abuse
SOPs	Standard Operating Procedures
UN	United Nations
UNCT	United Nations Country Team
UNPP	United Nations Partner Portal
UNSDCF	United Nations Sustainable Development Cooperation Framework
UNSG	United Nations Secretary General
WG	Working Group

EXECUTIVE SUMMARY

The national-level Protection from Sexual Exploitation and Abuse (PSEA) Network in Dhaka was established in 2020, and it is composed of PSEA Focal Persons from UN Agencies and NGOs (61 members in total) who jointly work for the prevention and response to SEA at the national level. The national level is supported by a PSEA sub-national level in Cox's Bazar, where the PSEA network was established in October 2017 following the largest-scale influx of Rohingya refugees in August 2017. Effective and sustainable methods to prevent and respond to SEA must be supported by government institutions.

The IARA was conducted from Jan-March 2025 across 7 Divisions, through 32 Focus Group Discussions (FGDs) that included women, men, adolescent girl and boys, and children between the ages of 9-12 years old. The assessment further includes Key Informant Interviews (KII) with government officials including District Judge, the Armed Police Battalion (APBn) and Office of the Refugee Relief and Repatriation (RRRRC) representatives, community leaders, the UN Resident Coordinator, academicians, and front-line staff. From the humanitarian and development community, 97 program managers, 128 PSEA focal points, 32 senior managers, and 15 cluster/sector coordinators participated in this study. Following the analysis of the data, PSEA focal points and other experts such as cluster/sector coordinators validated the findings both in Dhaka and Cox's Bazar and developed the tailored recommendations for senior leadership, including the RC and UNCT, PSEA Networks, Clusters/Sectors, individual organizations (including UN and NGOs), Government, and donors, to address the urgent needs for SEA in the specific context.

The key findings of the report identify areas of improvement at governance and organizational level to respond to SEA. The primary finding confirms the high threats and the significant exposure to SEA in both humanitarian and development context in Bangladesh. Climate vulnerability and funding cuts will increase the risk related to SEA. With the uncertainty in the current funding situation, the threat of sexual exploitation and abuse already "rampant" will become devastating. Funds related problem is the primary reason mentioned by programme managers for not being able to mainstream PSEA, assess their partner for SEA enough, or to conduct SEA risk assessments. Focal points are double or triple hatting and being appointed regardless of their background with insufficient support and capacity building, including a high turnover. The few resources currently available, need to be channelled via the PSEA network, to ensure an optimization of resources, avoiding duplication of activities and ensuring a common approach and response to SEA in Bangladesh. This would include, updating and implementation of an effective communication strategy that improve the community's awareness on SEA, their rights as beneficiaries to never have to pay, give part of their provisions, or submit to exploitation or harassment to get aid. This approach will ensure a sustainable prevention and response even if not all organization working in Bangladesh will have dedicated funds for PSEA.

In the past months, a technical group, including UNs and NGOs, provided technical support to the government to review the Sexual Harassment act. As well, Bangladeshi Government is already a signature of the joint UN-Government framework on PSEA. However, would be important to encourage the government to develop SEA dedicated law, well-defined and inclusive of the abuse against beneficiaries expanding from the current focus of the high court on exclusively female employees., this would expand the law further and increase structural protective mechanisms and hold public servants accountable. Collaborations between the national PSEA network and the already existing governmental hotlines would facilitate process for the establishment of national Community Based Compliance Mechanism (CBCM) to ensure accessible reporting mechanism are available for beneficiaries among all Bangladesh. The reporting mechanism in Cox Bazar relies heavily on the community leaders' structures, with beneficiaries noting their preference to turn to the Camp in Charge (CiC) for lodging complaints or reporting sexual exploitation and abuse. However, this report finds that there are not clear and common reporting channels available for the community to turn to, making the CiC their primary choice. UN and INGOs are slow to respond to SEA allegations, while local NGOs are not trained or equipped to handle administrative investigations, although the UN requires them to have investigation capacities in place to have access to funds. Ensuring the capacity of local

investigators to be increased through international standard trainings and procedures will prevent further harm to the victims, increase response rates and reduce some of the mistrust that has developed from a lack and delay of response. Local courts are also overstretched and not equipped to handle the number of cases, police stations have limited to no privacy for making confidential complaints and often are directly involved in sexually abusing the community, making channels for recourse extremely difficult, in the Rohingya context particularly but also across the Country. This report recommends that the public servants' Code of Conduct (CoC) explicitly include a zero-tolerance policy on SEA, as it currently lacks any reference to it.

There is a lack of up-to-date data on sexual exploitation, abuse, and harassment (SEAH), which makes it difficult to accurately quantify the extent of the issue. However, in April 2025 alone, gender-based violence (GBV) cases in Bangladesh reportedly included 80 rapes, 24 gang rapes, and 29 attempted rapes¹. In addition to these figures, both primary and secondary data highlight the widespread nature of SEA, with girls and women frequently harassed for their contact information, subjected to online abuse, and remaining highly vulnerable in various environments.

Through the IARA we find efforts to prevent SEA have been put in place with a robust number of PSEA focal points active in the Network, the CBCM in Cox Bazar, and funding supported the Network and IARA. The IARA finds however, that many of the checkbox actions of organizations have led to some key places for improvement within the response. Firstly, although there are improvements in staff awareness on PSEA and commitment to report, there remains some gaps in understanding with some aid workers still believing that engaging in prostitution if legal in the duty station is acceptable. It should be noted that this is the first time in the last four years when staff note that PSEA trainings were not applicable for their deployment, as well, it was reported follow up training on PSEA was lower than previous year.

As reported by program managers, only 28% of the current funds are explicitly allocated for PSEA activities. Funding for almost 63% of programs does not have specific budget lines for PSEA but implicitly included under Protection or GBV funding, with 24% of those not even earmarked. When funding is allocated as a lump sum for all things related to protection, it undermines PSEA and protection efforts and makes it challenging to institute preventive mechanisms effectively. Most program managers indicate that they (60%) cannot do more regular SEAH risk assessments due to a lack of funds.

In short, Bangladesh PSEA Network has made significant progress in some front with regards to commitments, trainings and internal awareness raising. However, at a country-wide level it remains at an initial stage in tackling PSEA as the Country wide network is relatively new. For the Rohingya Refugee Response, similar checkbox actions have really put many things in place such as CBCM, PSEA focal points, and information sessions, however the level of risk remains very high with violations frequently occurring and limited to no recourse, response, or means for proper action against perpetrators who easily are able to move between organizations. As the country strengthens its legal framework, builds its civil servants' capacity, and enforces greater zero tolerance for violators, organizations must be swift in securing funding, prioritizing PSEA network actions such as improved CBCM, trainings, harmonized communication strategy, efficient information sharing to prevent perpetrators to move between organization at a volunteers, contractor, or daily wage level. An overall organizational responsibility is essential to ensure focal points capacity building, retention, and financial support. Donors need to invest and secure the funding gaps to ensure that the PSEA Network can lead the coordination of over 300 organizations and ensure that nationally and regionally greater harm is not created by pulling out all the actions that are ongoing.

¹ [Bangladesh Mahila Parishad](#)

INTRODUCTION

Bangladesh is one of the most densely populated countries in the World, with an estimated population of 171.2 million.² The current political context is unprecedented for Bangladesh. Since independence in 1971, Bangladesh has experienced political instability, including military coups and authoritarian rule. The transition to democracy in the 1990s shifted governance, though politics continues to be shaped by the rivalry between the Awami League (AL) and the Bangladesh Nationalist Party (BNP). In 2024, Bangladesh experienced a significant wave of protests, known as the July Revolution, which led to the ousting of Prime Minister Sheikh Hasina after 15 years in power.

Bangladesh is a low-lying country on the delta formed by the Ganges, the Brahmaputra, and the Meghna rivers. Most parts of the country are highly flood prone. The combination of high population density and flood risk makes Bangladesh one of the most disaster-vulnerable countries.³ Roughly 80% of the annual rainfall occurs during the annual monsoon, leading to major floods, cyclones, and associated storm surges that cause considerable loss of human life annually.⁴ On 26 May 2024, Cyclone Remal made landfall near the coasts of Bangladesh and India, having a severe impact on 4.6 million people across 19 districts, resulting in fatalities, and over 807,023 people were displaced across the affected regions.⁵ By September 2024, 18.4 million people in Bangladesh had been impacted by cyclone Remal and recurrent floods, leaving an estimated 6.4 million needing immediate assistance in 29 districts, which accounts for 45 percent of the 64 total districts.⁶

Under the leadership of the Government of Bangladesh and in collaboration with the UN agencies, non-government organizations (NGOs), private-sector development agencies and donors, the UN Resident Coordinator (RC) supports the disaster response. The Humanitarian Advisory Group (HAG) supports the RC to ensure necessary arrangements are in place to enable effective international support for mitigation, preparedness, early warning, anticipatory action and support to nationally led disaster response.

Bangladesh also hosts the world's largest refugee camp in Cox's Bazar, a region affected by devastating floods. Since the largest influx in August 2017 more than 1,005,520 stateless Rohingya refugees from Myanmar have resided in Ukhiya and Teknaf Upazilas (sub-districts), having fled ethnic cleansing by the Rakhine state. The Government of Bangladesh, with support from international partners, maintains that Myanmar must ensure conditions that allow for the safe and dignified repatriation of Rohingya refugees. While negotiations are ongoing, a large-scale return is expected to take time. The government's focus on repatriation has complicated humanitarian and development actors' sustainable planning for Rohingya refugees. Freedom of movement, access to livelihood, justice system and formal education are all limited by the Bangladeshi government, leaving 95% of these refugees highly or moderately vulnerable and entirely dependent on humanitarian assistance to

² Humanitarian Advisory Group. https://humanitarianadvisorygroup.org/wp-content/uploads/2025/01/HAG-UKHIIH-HRRI-Bangladesh_Full-report_DRAFT4-1.pdf

³ Humanitarian Advisory Group. https://humanitarianadvisorygroup.org/wp-content/uploads/2025/01/HAG-UKHIIH-HRRI-Bangladesh_Full-report_DRAFT4-1.pdf

⁴ Humanitarian Advisory Group. https://humanitarianadvisorygroup.org/wp-content/uploads/2025/01/HAG-UKHIIH-HRRI-Bangladesh_Full-report_DRAFT4-1.pdf

⁵ UNICEF (2024) *UNICEF Bangladesh Humanitarian Situation Report No. 69: 01 January-30 September 2024*. - Bangladesh | ReliefWeb

⁶ UNICEF (2024) *UNICEF Bangladesh Humanitarian Situation Report No. 69: 01 January-30 September 2024*. - Bangladesh | ReliefWeb

meet basic needs with complete restriction of movement in and out of camps by the Bangladeshi government.⁷ Due to refugees' heavy reliance on aid, sexual abuse and exploitation by humanitarian workers are pervasive in the camps.⁸

Having fled ethnic cleansing and conflict-related sexual violence and rape by the Myanmar government, the majority of Rohingya refugee have experienced or witnessed horrific gender-based violence adding to their vulnerability. "Prolonged displacement and uncertainty about the future have facilitated the proliferation of armed groups and gangs in the camps, leading to a deterioration of the security situation since the beginning of 2022, with armed clashes, targeted killings, kidnappings, and harassment. Reports of sexual and gender-based violence, abductions for ransom, and enforced disappearances in the camps, among other illegal activities, are also steadily increasing."⁹

The humanitarian response structure in Cox's Bazar for the Rohingya Refugee Response is led by a dual structure of national and international leadership. The Bangladeshi leadership comprises the Refugee Relief and Repatriation Commissioner (RRRC) and his Camp-in-Charges (CiCs). The international humanitarian stakeholders are led by the UN Resident Coordinator (RC), the IOM Chief of Mission, and the UNHCR representative in Dhaka and by the Inter Sector Coordination Group (ISCG) Principal Coordinator (SC) and the heads of UN sub-offices in Cox's Bazar.¹⁰ Each camp has a site management structure consisting of a CiC and a humanitarian organization. Most of the ten sectors/sub-sectors are jointly coordinated by a Bangladeshi government entity and a UN agency and NGOs. The police, army, and security agencies are also present in the camps. In addition, at the beginning of the crisis in 2017, the army created a new cadre of block leaders: the Majhi's. They have now gained a permanent role in governing their communities.¹¹ In Cox's Bazar context, PSEA activities request the involvement of several layers of government actors in (1) responsibility to prevent, (2) regulate a zero-tolerance system, and (3) respond to complaints in a victim-centered approach. This requests a strong and good coordination with the government counterpart.

The refugee influx has been an economic and environmental strain for Cox's Bazar. The influx has intensified pressure on ecological resources, employment opportunities, infrastructure, and services and exacerbated the risks of conflict between Rohingya and host communities. 2024 showed the highest violent crime rate recorded in Cox's Bazar. The last few years have seen an increase in tension with the Rohingya community, major political protests and changes, and global funding cuts with other geopolitical conflicts.¹² Despite international efforts to balance support to refugees and host communities with recent recurring floods affecting the entire region, tensions persist, mainly over economic competition and perceived unfair aid allocation.

⁷ Joint Multi Sectoral Needs Assessment (J-MSNA): Camp-level findings (2023)

⁸ UNHCR, CARE and ActionAid (2020). *An Intersectional Analysis of Gender amongst Rohingya Refugees and Host Communities in Cox's Bazar, Bangladesh. An Inter-Agency Research Report*, September 2020.

⁹ Joint Multi-Sectoral Needs Assessment (2023)

¹⁰ Netherlands Ministry of Foreign Affairs, *Mind the Gaps*, (8-12 December 2019)

¹¹ Netherlands Ministry of Foreign Affairs, *Mind the Gaps*, (8-12 December 2019)

¹² UNHCR Protection Monitoring Reports (2020-2024)

BACKGROUND

Despite best efforts, Sexual Exploitation and Abuse (SEA) is a risk present in any context where aid organizations operate. Bangladesh, with a refugee response, a climate crisis affecting 60% of the country and the ongoing development work, has been dependent on aid for the last decades, with growing concerns that global climate changes are worsening the situation. With poverty and dependency, sexual exploitation and abuse are key concerns for the country, and effective ways to prevent and respond to this problem need to be the backbone of public services throughout the Country. Effective risk management should inform the actions of key stakeholders with data and targeted information to inform decision-making. As Protection from Sexual Exploitation and Abuse (PSEA) is a cross-cutting issue, an inter-agency this SEA Risk Assessment aims to identify collective SEA risks and provide targeted SEA risk mitigation recommendations to senior leadership, including the RC and UNCT, PSEA Networks, Clusters/Sectors, individual organizations (including UN and NGOs), government, and donors with the aim to:

1. Increase awareness and advocacy: Understanding SEA risks and identifying response gaps in the context.
2. Improve efficiency: Identifying priorities for SEA risk mitigation and optimizing resource allocation.
3. Promote evidence-based decision-making: Generating information and analysis to strengthen PSEA responses.
4. Ensure knowledge retention: Preserving SEA risk knowledge in the case of staff turnover.
5. Enhance accountability: Raising awareness of senior leadership on urgent SEA risks and relevant mitigation measures to address these.

The national-level Protection from Sexual Exploitation and Abuse (PSEA) Network in Dhaka was established in 2020, and it is composed of PSEA Focal points from UN Agencies and NGOs (61 members in total) who jointly work for the prevention and response to SEA at the national level. At the Cox's Bazar level, the PSEA network was established in October 2017 following the largest-scale influx of Rohingya refugees in August 2017. Today, the PSEA Network comprises 164 members, including UN agencies, international NGOs, and national and local NGOs. Most of these members are actively engaged in Cox Bazaar.

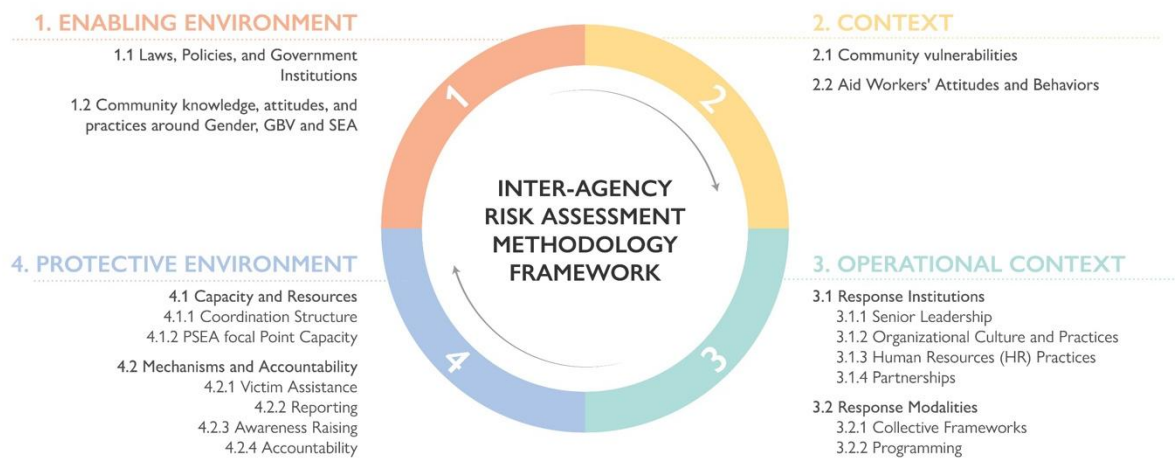
The inter-agency SEA Risk Assessment is a deliverable of the National PSEA Network Action Plan, in coordination with the Bangladesh PSEA Network, overseen by the Office of the UN Resident Coordinator. PSEA Network members at the Dhaka level and Cox's Bazar level were actively engaged throughout the SEA Risk Assessment data collection and Inter-agency SEA Risk Assessment Workshop to validate SEA risks and make recommendations to advance PSEA efforts across Bangladesh.



METHODOLOGY

The IARA SEA considers four (4) key dimensions, in line with the [Global SEA Risk Overview \(SEARO\) Framework](#),¹³ Each consists of the SEA Risk Areas outlined in Figure 1.

Figure 1. Inter-Agency Risk Assessment Methodology Framework



The assessment was conducted from January to March 2025. It encompassed the following geographical areas:

- Barishal
- Chittagong
- Dhaka
- Khulna
- Rajshahi
- Rangpur
- Sylhet

¹³ The SEARO was developed by UNICEF and UN OCHA in collaboration with the FCDO, on behalf of the Inter-Agency Standing Committee (IASC) Secretariat, with the aim to support analysis, decision-making, and resource allocation for SEA at global and country levels.

Figure 2. Inter-Agency Risk Assessment Locations



Primary data was collected with the following groups using context-appropriate methods and tools from secondary sources and inputs from the PSEA network coordinators. Due to funding and time constraints, we conducted a comprehensive assessment in roughly 16 locations with over 40 focus group discussions with the community.

Primary Data Collection across Bangladesh						
Division	Location	Rational	# FGD with Community	Categories	KIs/FGDs with other groups	Additional Data collection per location
Dhaka	Mirpur	Metropolitan City, Hub of Development Projects, presence of Sex Workers and Garment workers	2	1 FGD Girls (13-18), 1 FGD Boys (13-18)	0	N/A
	Dhaka		1	1 FGD Children (9-12)	0	N/A
	Manikganj		2	1 FGD Women (18+), 1 FGD Men (18+),	1	1 FGD with frontline staff males
	Savar		2	1 FGD Men (18+), 1 FGD Women (18+)	1	1 FGD with Frontline staff females
Chittagong	Rangamati	Indigenous and different ethnic groups	2	1 FGD Girls (13-18), 1 FGD Women (18+)	2	1 KI with community/traditional leader (religious, elder), 1 FGD with Frontline staff females and male
Rangpur	Kurigram	Flood-prone/cyclone-affected	1	1 FGD Children (9-12)	1	1 KI with community/traditional leader (religious, elder)
	Kurigram		2	1 FGD Girls (13-18), 1 FGD Boys (13-18)	1	1 FGD with Frontline staff females and males



	Kurigram		2	1 FGD Men (18+), 1 FGD Women (18+)	0	N/A
Sylhet	Sunamganj	Flood-prone/cyclone-affected	4	1 FGD Boys (13-18), 1 FGD Girls (13-18), 1 FGD Men (18+), 1 FGD Women (18+)	2	1 KII with community/traditional leader (religious, elder) and 1 FGD with Frontline staff females
Rajshahi	Rajshahi	Border Proximity and Human Trafficking Risks, Seasonal Labor Migration and Exploitation Risks	4	1 FGD Boys (13-18), 1 FGD Girls (13-18), 1 FGD Men (18+), 1 FGD Women (18+)	0	N/A
Khulna	Satkhira	Flood-prone/cyclone-affected	4	1 FGD Boys (13-18), 1 FGD Girls (13-18), 1 FGD Men (18+), 1 FGD Women (18+)	1	1 FGD with frontline staff males
	Khulna		1	1 FGD Children (9-12)	0	N/A
Barishal	Barishal	Climate Change Vulnerability	1	1 FGD Children (9-12)	0	N/A



Primary Data Collection for Cox's Bazaar						
Upazila/Sub-District	Name of the Camp	Rational	FGD with Community	Categories	# of Additional Data collection per location	Additional Data collection per location
Teknaf	Camp NRC	High Risk	2	1 Children (9-12), 1 Female +18 FGD.	1	1 KII with elected leader (Camp Committee)
Ukhiya	8W	High Risk	2	1 Female (13-18) FGD, 1 Male (13-18) FGD	0	None
Ukhiya	Camp 11	High Risk	2	1 Male 18+ FGD, 1 Female +18 FGD	1	1 KII with Majhi
Ukhiya	KRC	A medium-risk and registered camp where Rohingya refugees who arrived before 2017 reside.	2	1 Female (18+) FGD, 1 Male (18+) FGD	1	1 FGD with frontline staff males (mix group of frontline staff from multiple agencies)
Ukhiya	Camp 14	A low-risk camp that is geographically separated from other camps in Ukhiya.	2	1 Children (9-12) FGD, 1 Male +18 FGD	1	1 FGD with frontline staff females (mix group of frontline staff from multiple agencies)
Ukhiya (Host Community)	Palongkhali	Most of the camps in Ukhiya are located within the Palongkhali Union.	2	1 Male (15-18) FGD, 1 Female FGD (15-18)	1	1 KII with community/traditional leader (religious, elder)

Additionally, the following data sources include specialized information gathered from individuals working within government institutions, aid agencies, and the United Nations.

Additional Key Informant Interviews (KII):

- Academician (Professor of Gender Studies, Dhaka University)
- Advocate of the supreme court
- District Judge
- Government stakeholders (RRRC Representative and APBn Representatives)
- UN Resident Coordinator

Online Questionnaire Surveys:

- 128 PSEA Focal Points
- 15 Cluster/Sector Coordinators/WGs
- 32 Senior Managers
- 97 Program Managers

Following the analysis of primary and secondary data, the findings were summarized to develop this report. These findings have been verified with PSEA focal points and key stakeholders in Cox's Bazar and Dhaka, and the resulting recommendations will be incorporated into the PSEA Action Plan.



ACKNOWLEDGMENTS

This report was made possible by the support and partnership with The Foreign, Commonwealth and Development Office (FCDO), who has been an ally and advocate for the Protection of Sexual Exploitation and Abuse. The PSEA Network members contributed to making the IARA possible. We want to acknowledge the commitments and contributions from the following organizations that helped collect the primary data: IOM NPM, UNHCR, Terres des Hommes (TDH), UNICEF, Handicap International (HI) and Breaking the Silence (BTS).

The compilation of the IARA was also made possible by the PSEA Network Coordinators and the consultant, Aliyah Sarkar, who led the process for the IARA from the adaption of data collection tools, designing the methodology, analysing the data, and drafting of the findings.

INTER-AGENCY RISK ASSESSMENT KEY FINDINGS FOR BANGLADESH

The findings of this report are presented within the four dimensions of risk for Sexual Exploitation and Abuse. The first dimension reflects contextual factors that exist in every country that lend an enabling environment for sexual exploitation and abuse. The second dimension is the Situational Context, which reflects factors derived from one or more crises in a country, such as a conflict or natural disaster. The third dimension, called Operational Context, reflects factors related to the response operation. The fourth dimension is the Protective Environment, which reflects the specific protective measures that are put in place to address and prevent sexual exploitation and abuse.

Dimension One: Enabling Factors for Sexual Exploitation and Abuse

1a. Laws, Policies and Government Institutions

This area captures the following SEA-related risks: (a) PSEA-related country laws, policies, and practices (PSEA Policy, vetting systems, Code of Conduct for government staff, PSEA training, PSEA departments/ units established within government bodies, etc.), (b) Government's structures, systems, and SEA response capacity (reporting mechanism, investigations, victim assistance and accountability), (c) PSEA awareness and knowledge among government staff.

The legal framework for sexual exploitation and abuse in Bangladesh is currently fragmented and lacks specific provisions, particularly concerning sexual exploitation or abuse of beneficiaries, clients, or vulnerable individuals within the context of workplaces or service delivery. While specific legal provisions address sexual harassment in workplaces, they do not cover the broader scope of sexual exploitation or abuse, leaving significant gaps in protection and recourse.

Bangladesh ratified Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) in 1984.¹⁴ In February of 2000, it adopted The Women and Children's Repression Prevention Act.¹⁵ Bangladesh is a signatory to the UN volunteer compact¹⁶ on PSEA and contributes to the UN Victim Support Trust Fund¹⁷. The legal framework in Bangladesh, however, lacks specific legislation on the protection of sexual exploitation and abuse (PSEA). The most relevant provision is Section 332 of the Bangladesh Labor Law, which addresses conduct toward female employees, prohibiting behavior that may be indecent or harm a female employee's modesty or honor.¹⁸ However, this provision does not define violence or harassment and lacks clear legal recourse for such actions. The law is also exclusionary, as it does not address male victims of sexual exploitation or abuse in the workplace, referring only to female employees. Bangladesh was set to ratify ILO C-190¹⁹: Violence and Harassment Convention (No. 190) which was being considered for ratification in March 2025,

¹⁴ CEDAW. <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-elimination-all-forms-discrimination-against-women>

¹⁵ Women and Children's Repression Prevention Act. https://natlex.ilo.org/dyn/natlex2/r/natlex/fe/details?p3_isn=110524

¹⁶ UN Volunteer Compact on PSEA. <https://www.un.org/preventing-sexual-exploitation-and-abuse/content/voluntary-compact#:~:text=The%20Compact%2C%20which%20is%20between,addressing%20sexual%20exploitation%20and%20abuse.>

¹⁷ UN Victim Support Trust Fund. <https://www.un.org/preventing-sexual-exploitation-and-abuse/content/trust-fund>

¹⁸ Emon, Mahabub. (2022) Sexual Harassment in Bangladesh: A Note on Legal Perspective. [\(PDF\) Sexual Harassment in Bangladesh: A Note on Legal Perspective](#)

¹⁹ [ILO Convention C190 – Violence and Harassment Convention, 2019 \(No. 190\)](#)

however that still has not happened, but there is a commitment and interest for this to happen. The table below provides a classification of all relevant aspects of the Bangladeshi law to the following protection issues.

Offence	Relevant Law/Rules/Guidelines
Constitutional law	<ul style="list-style-type: none"> Article 28 (2) “women shall have equal rights with men in all spheres of the state and of public life”. Article 28(4) “Nothing in this article shall prevent the State from making special provision in favour of women or children or for the advancement of any backward section of citizens.” Article 19(3) “The State shall endeavor to ensure equality of opportunity and participation of women in all spheres of national life.”
Sexual Harassment	<ul style="list-style-type: none"> High Court Division’s directives on sexual harassment 2009 361 A of Labor Rules 2015 (amended in 2022) Penal Code 1860 (section 354)
Child Sexual Exploitation	<ul style="list-style-type: none"> The Children Act 2013 Child Marriage Restraint Act 2017 The Prevention of Oppression Against Women and Children Act 2000 The Penal Code, 1860 (section-366A, 375 and 509)
Rape	<ul style="list-style-type: none"> Penal Code, 1860 (section 375) The Prevention of Oppression Against Women and Children Act 2000
Trafficking	<ul style="list-style-type: none"> The Prevention and Suppression of Human Trafficking Act, 2012
GVB	<ul style="list-style-type: none"> Domestic Violence (Prevention and Protection) Act, 2010

In 2009 the High Court Division (HC) acknowledging the need for a legal framework to address sexual harassment, provided directives²⁰ for workplaces and educational institutions, requiring institutions to form Sexual Harassment Complaint Committees to investigate complaints and take disciplinary actions. The High Court further stated that “These directives are aimed at filling up the legislative vacuum in the nature of law declared by the HC under the mandate and within the meaning of Article 111 of the Constitution”. Considering a specific law on sexual harassment is still missing, the apex court directives are considered as Judge Made Laws in the interim. But the High Court Order lacks a definition of sexual harassment that is gender inclusive or expansive enough to address sexual exploitation and abuse.

The recently enacted amendment to the *Nari-O-Shishu Nirjatan Daman Ain* (Women and Children Repression Prevention Act) 2011 includes a more detailed and inclusive definition of sexual harassment, stricter punishments, a faster appeal process and mandate the establishment of special tribunals for child rapes cases²¹. These changes reflect the government’s response to rising concerns over violence against women and children,

²⁰ [Supreme Court of Bangladesh, BNWLA v. Government of Bangladesh, 14 May 2009, Petition No. 5916 of 2008.](#)

²¹ *Sexual Harassment and the Law: Where’s the Problem?* (2019)

and aim to ensure quicker and more effective legal recourse. Currently, the Ministry of Women and Children Affairs, in collaboration with the ILO and other UN agencies, is leading a consultative process to gather stakeholder feedback on the Draft Sexual Harassment Act 2024²².

Rule 361A of Bangladesh Labor Rules 2015, amended in 2022, defines "unwelcome conduct and sexually determined behaviors" those behaviors such as physical advances, abuse of power, and demand for sexual favors. However, it still does not provide a clear definition of sexual exploitation or abuse and lists examples without legal clarity. Furthermore, there is no mention of the exploitation or abuse of beneficiaries or clients in the law, leaving a significant gap in the protection of vulnerable populations. Local organizations have interpreted these rules as addressing misconduct rather than sexual harassment, but a clear and consistent approach is lacking due to the vagueness of the law.

The government's regulatory framework, particularly the *Government Servants (Conduct) Rules* (1979) and *Discipline and Appeal Rules* (1985), does not define sexual exploitation or abuse as misconduct. While the 1985 rules clarify disciplinary actions, they fail to address sexual exploitation or abuse at all. This exemption creates an environment where perpetrators can evade accountability, and victims are often left without recourse. Our Key Informant Interviews (KII) with the government stakeholders show concerns usually focused on the reputational harm of the perpetrators and the perpetrators' rights, including cross-examination while there is still a lack of understanding and prioritization of the victim-centered approach.

One of the Key Informant, a legal expert, shared that according to BLA, "If in an enquiry, any oral evidence is given by any party, the person against whom such evidence is given may cross examine the witness." (S.24(5), BLA 2006) and the law protects the perpetrator in many ways, "Cross-examination is one of the fundamental rights of the accused and the same is provided in S.24(5) of BLA (Bangladesh Labor Act)2006. Hence, if the accused employed is barred from cross-examination, this will be a violation of the aforesaid provision. Therefore, the organization shall be subject to punishment of fine amounting to BDT 25,000.00 (S.307 of BLA, 2006). Further, if the punishment is challenged by the accused employee, the court may order the procedure as illegal and direct organizations for reinstatement of the accused employee with the payment of back wages."²³ This makes instituting a zero-tolerance policy within local NGOs and development agencies very challenging, making difficult for organizations to take disciplinary actions against perpetrators. The law allows the victim to be subject to hostile environments and interactions with the perpetrator. This fundamentally goes against victim-centered principles globally promoted by the IASC standards. While Rule 361KA of the Bangladesh Labour Rules (2015, amended in 2022), calls for the establishment of Complaint Committees in workplaces, there is no government monitoring mechanism to ensure their implementation. These committees have a duty to conduct investigations, while there is no technical investigation capacity requirement to be a member of the committee itself. Additionally, there is no clear or standardized reporting mechanism available online or within government departments, and key informants noted that complaints must follow each department's specific procedures or be filed through the police. Victims often face difficulties in identifying the appropriate government authority to file their complaints with, and the complaint process itself remains unclear and inaccessible. Finally, Rules are simply an executive order, not an Act of Parliament, limiting their efficiency.

The RRRC (Refugee Relief and Repatriation Commissioner) Office serves as the critical liaison between the Government of Bangladesh (sitting in Dhaka) and operations in Cox's Bazar. It plays a central role in maintaining

²² Ministry of Women and Children Affairs. (2025). [Workplace and Educational Institutions Sexual Harassment Prevention and Protection Act, 2024](#).

²³ KII with Legal Counsel from TdH

law and order within the Rohingya refugee camps and coordinates with a wide range of stakeholders, including donors, security agencies, NGOs, and government bodies. The RRRC's authority extends beyond sectoral coordination. It is responsible for issuing permissions and access passes for NGOs, controlling the movement of Rohingya individuals within and outside the camps, and granting approval for foreign nationals and academic researchers seeking to work in the camps. RRRC Office is always the first responder of any disaster in the camps. As such, effective coordination with the RRRC is essential for any organization operating in this context. However, RRRC's policies do not align with the Do No Harm principle, protection principles, and zero tolerance for sexual exploitation and abuse (SEA). Divergence from these principles can exacerbate risks and cause further harm within the camps.

In the Rohingya camps of Cox's Bazar, the Camp-in-Charges (CiC) are the most commonly identified authorities for reporting complaints, with 60%²⁴ of respondents selecting them as their first choice as there is no other alternative actor that can take immediate action on allegations from beneficiaries, while organizations might need a long time to conduct and complete investigations. Other frequently mentioned channels included Majhis (47%), Site Management (32%), and in-person reporting to Humanitarian Workers (30%). However, organizations working in the camps, reported CiCs conducting investigations tend to cross-examine the victim alongside the perpetrator, usually in front of the community and with a tendency to solve the allegations following common practices (e.g. marriage) rather than follow the investigation guidelines and procedures. These can retraumatize and further harm the victims and discourage other victims from reporting. Given the CiCs' influential role and the complex power dynamics in the camps, it is essential that all responses to SEA align with survivor-centered approaches, uphold protection principles, and avoid reinforcing harmful practices or impunity.

Other actors, such as the Armed Police Battalion (APBn), police and other security agencies are present outside and inside the Rohingya Refugee camps. The Bangladeshi army, Navy, and Air Force are all considered persons always on duty and thereby bound to the principles of their code of conduct.²⁵ They mostly operate in places of displacement or locations where they are helping flood-prone or post natural disaster locations. These tend to be times of great need for civil services and a time of great vulnerability, creating room for exploitation. Sexual exploitation and abuse by military persons are triable by the Court Martial along with "indecent, disgraceful and unnatural acts and acts or conduct to the prejudice of good order and military discipline" under the Army Act, Navy Ordinance and Air Force Act.²⁶ Although insufficient, similar action is needed for government public servants on and off duty. A specific law or explicit line in the codes of conduct of government public servants and military personnel would be more effective and leave no room for ambiguity or impunity.

Bangladesh's legal framework for addressing sexual harassment, exploitation, and abuse remains insufficient and fragmented. The provisions, particularly in the Labor Law, focus on female victims, leaving little to no protection or recourse for male victims or those who do not fit within the narrow, gendered categories. This gendered approach creates a significant gap in the law, leaving room for exploitation and abuse against anyone outside this category, with no clear legal framework for addressing their claims. The exclusionary nature of the statutes exacerbates the vulnerability of marginalized individuals, perpetuating a cycle of impunity. While there are

²⁴ [*Assessment Report: Awareness of Reporting Mechanisms for Reporting General and Sensitive Issues in the Rohingya Camps \(May 2023-June 2023\)*](#)

²⁵ [*United Nations Peacekeeping – Bangladesh Fact Sheet*](#)

²⁶ [*United Nations Peacekeeping – Bangladesh Fact Sheet*](#)

provisions that criminalize certain forms of sexual harassment, there is no comprehensive law to address sexual exploitation or abuse, particularly about beneficiaries or clients. The existing laws and regulations are outdated and vague and fail to provide clear legal recourse for victims, leaving significant room for impunity and further harm. Legal reform needs to define and criminalize sexual exploitation and abuse, comprehensively incorporate a survivor-centered approach, and ensure that all forms of sexual misconduct are addressed with explicit, enforceable legal provisions.

1b. Community Knowledge, Attitudes, and Practices Around Gender, GBV, and SEAH

This area captures the following SEA-related risks: (a) Prevalence of harmful gender norms and practices that reinforce and perpetuate gender inequality, (b) Community knowledge, attitudes, and practices (KAP) on GBV/SEA, (c) Attitudes and practices towards culture of favour exchange/corruption.

“Many parents choose not to report incidents due to fear of losing respect in society. Instead, they often settle the matter with money offered by the abuser.” (Bangladeshi FGD Participant)

Gender-based violence (GBV) is a pervasive and deeply rooted issue in Bangladesh, affecting women, children, and vulnerable populations across the Country. According to the 2024 National Survey on Violence Against Women²⁷, “seven in ten women have experienced one or more forms of intimate partner violence—physical, sexual, emotional, controlling behaviors, or economic violence—in their lifetime, with four in ten facing it in the last 12 months.”²⁸ Among the various forms of violence, emotional abuse, both from intimate partners and non-partners, remains the most common. Furthermore, sexual violence, harassment, and abuse in the workplace are also prevalent. Studies have found that 22% of women garment workers in Bangladesh are subjected to physical, psychological, and sexual harassment, whether in the workplace or on their way to and from work.²⁹ Between Jan-Feb 2025 alone, there were over 85 cases of (60%) rape and (40%) gang rapes. There were 10 cases of attempted rape.³⁰ Almost 42% of the victims of rape and gang rape were under the age of 18, with the most attacked age group to be (13-18 year olds).³¹ These figures represent only the cases documented by Ain o Salish Kendra (ASK), a legal aid organization in Bangladesh; however, the actual numbers are likely to be significantly higher.

The circumstances for Rohingya refugees are more dire, having escaped genocide and rape as a strategy of ethnic cleansing. Eight years on, Rohingya women and girls in the camps remain high risk to GBV, with hundreds of cases of sexual assault, harassment, and other type of GBV reported every week.³² According to a recent

²⁷ Violence Against Women Survey (2024) [UNFPA Bangladesh | 2024 violence against women survey](#)

²⁸ Violence Against Women Survey (2024) [UNFPA Bangladesh | 2024 violence against women survey](#)

²⁹ Gender-based violence and harassment in the world of work: evaluating the laws in Bangladesh in light of the mandates of ILO Convention 190 (2021)

³⁰ [Violence Against Women -Rape Jan-Feb 2025 | Ain o Salish Kendra\(ASK\)](#)

³¹ [Violence Against Women -Rape Jan-Feb 2025 | Ain o Salish Kendra\(ASK\)](#)

³² Closing the Accountability Gap: “Community Perspectives and Experiences with Sexual Exploitation, Abuse, and Harassment (SEAH) in Occupied Palestinian Territories (oPt), Bangladesh, and Ethiopia” (2022)

study, children and adolescent girls are the most vulnerable as they are the demographic group most vulnerable to SEAH.³³ “Sexual Exploitation and abuse by humanitarian actors is not often talked about by community members, fearing disruption or even withdrawal of aid and services. However, Rohingya women reveal that Sexual and Gender-Based Violence (SGBV) is *endemic*.”³⁴ Women and girls also reported facing sexual exploitation and abuse from service providers (i.e., staff providing various services in the camps such as food, fuel, medical services, etc.), as well as NGO staff and authority figures in the camps.”³⁵ Further, a small but notable portion of respondents (3%)³⁶ agree that it is acceptable for individuals to engage in transactional relationships with humanitarian workers in exchange for material favors. Similarly, 1.36% believe that humanitarian workers can ask for favors in exchange for assistance. Even if these percentages are low, they represent potential vulnerability within the community where exploitative relationships might be normalized or accepted.³⁷

There is a need to strengthen community knowledge on reporting mechanisms for sexual exploitation and abuse (SEA). Approximately 59% of Rohingya households have knowledge and received awareness on the available reporting mechanisms. About one quarter (26%) received awareness sessions in 2024, representing a 10% increase from 2023. These figures are consistent across gender and age groups. Most Rohingya community people prefer to report SEA cases to their Camp-in-Charge (72%), women and girl safe spaces (43%) and Mahjis (38%).³⁸

While most households (96%) are confident in their ability to report misconduct, 4% are hesitant. Among hesitant households, 57% (62% women and 38% men) do not know what constitutes misconduct or reportable behavior, and 29% do not know where to make a report. A gender analysis of the barriers to reporting reveal concerning disparities: women are significantly less likely to know where to report misconduct (26% of women versus 33% of men). Such gaps suggest women may be exposed to higher risk of exploitation and abuse than men due to lack of knowledge.³⁹ Another assessment also found only 5% could identify humanitarian workers, indicating significant confusion about who qualifies as an aid worker.⁴⁰

Through the IARA and confirmed by the CHS Alliance report⁴¹ we found general misunderstandings about SEAH perpetrators. Initially, community participants understood SEAH broadly as sexual violence by men against women and girls without specific recognition of aid worker involvement. However, during consultations, community members identified a particular pattern - they reported that volunteers working with humanitarian

³³ *Closing the Accountability Gap: “Community Perspectives and Experiences with Sexual Exploitation, Abuse, and Harassment (SEAH) in Occupied Palestinian Territories (oPt), Bangladesh, and Ethiopia” (2022)*

³⁴ *Ibid.*

³⁵ *Closing the Accountability Gap: “Community Perspectives and Experiences with Sexual Exploitation, Abuse, and Harassment (SEAH) in Occupied Palestinian Territories (oPt), Bangladesh, and Ethiopia” (2022)*

³⁶ ISNA (April 2024)

³⁷ *Ibid*

³⁸ *Ibid*

³⁹ *Ibid*

⁴⁰ *Closing the Accountability Gap: “Community Perspectives and Experiences with Sexual Exploitation, Abuse, and Harassment (SEAH) in Occupied Palestinian Territories (oPt), Bangladesh, and Ethiopia” (2022)*

⁴¹ [Closing the Accountability Gap: Country Assessment Report – Phase 1 \(CHS Alliance, 2022\)](#)

organizations, especially those from the Rohingya community, were frequently perpetrating abuse.⁴² Rohingya women and girls specifically noted that volunteers were misusing their positions within aid organizations to exploit women and girls in their communities. These volunteers were said to leverage their association with humanitarian groups and their camp access to intimidate and abuse vulnerable individuals.⁴³

According to Human Rights Watch, Bangladeshi authorities seldom hold the police in the camps to account for human rights violations, which creates a climate of impunity for ongoing abuses including sexual assault. “The APBn police force has been targeting the Rohingya girls and women that they find attractive, threatening to arrest male family members if they refuse to cooperate,” a Rohingya activist said.⁴⁴ “Male APBn members just enter shelters, and if the men are away, they harass the women. As well, in IARA FGDs, community members have raised concerns about misconduct by some APBn personnel during FGDs, citing incidents of both sexual exploitation and extortion. During KII conducted with APBNs for this report, the APBn Deputy Inspector General (DIG) and other camp commanders emphasized that any APBn personnel found guilty of misconduct are held accountable and face appropriate disciplinary actions acknowledging the challenges victims face in reporting such incidents, particularly due to social stigma and fear. To address these barriers, they recommended a coordinated approach focused on strengthening the capacity of APBn personnel on PSEA and increasing the presence of female APBn staff within the camps to foster a more supportive environment for the victims.

Due to cultural and religious factors, Rohingya and Bangladeshi women and girls often underreport incidents out of fear of societal stigma and ostracization. This, coupled with fear of retaliation and cutting off aid if reporting misconduct by aid workers, has created an extremely vulnerable environment. “Women and girls are particularly subject to sexual exploitation and abuse because of their dependency on aid.”⁴⁵ As the dependency on humanitarian aid increases with a growing climate crisis, the risk of sexual exploitation and abuse continues to grow country wide.

Child sexual abuse is another distressing reality in Bangladesh, cutting across all levels of society. Children are vulnerable to abuse in their own homes, from relatives and trusted family friends, as well as in schools, communities, and workplaces.⁴⁶ Disadvantaged and disabled children are especially at risk, but abuse is by no means limited to these groups.⁴⁷ In most cases, the abuser is someone known to the child, often a family member or close acquaintance.

Commercial child sexual exploitation is particularly alarming, with children as young as 10 years old being sexually exploited in registered brothels, hotels, parks, streets, and transportation stations.⁴⁸ Children whose mothers work in brothels are often forced into the same environment, with many working as bonded sex workers to repay the brothel's madam for basic needs such as food, clothing, and shelter. “At present, many girls

⁴² *Closing the Accountability Gap: “Community Perspectives and Experiences with Sexual Exploitation, Abuse, and Harassment (SEAH) in Occupied Palestinian Territories (oPt), Bangladesh, and Ethiopia”* (2022)

⁴³ *Closing the Accountability Gap: “Community Perspectives and Experiences with Sexual Exploitation, Abuse, and Harassment (SEAH) in Occupied Palestinian Territories (oPt), Bangladesh, and Ethiopia”* (2022)

⁴⁴ Human Rights Watch (2024) <https://www.hrw.org/news/2024/01/24/bangladesh-police-abuses-rampant-rohingya-camps>

⁴⁵ GBVSS Sub-Sector Bangladesh Q2 Bulletin. April – June 2024 [Q2 2024 GBVSS Bulletin \(Last edited Sep 2024\)](#)

⁴⁶ UNICEF. *Child Sexual Abuse, Exploitation, and Trafficking in Bangladesh*. [trafficking.qxp](#)

⁴⁷ UNICEF. *Child Sexual Abuse, Exploitation, and Trafficking in Bangladesh*. [trafficking.qxp](#)

⁴⁸ UNICEF. *Child Sexual Abuse, Exploitation, and Trafficking in Bangladesh*. [trafficking.qxp](#)

are involved in sex work because services such as loans, shelter, and toilets are not available without money or sex,”
(a Bangladeshi Front-line staff during FGD)

Child victims of commercial sexual exploitation may also end up in brothels or on the streets through trafficking, family breakdowns, or poverty.⁴⁹ Once on the streets, these children are often subjected to physical abuse, rape, and exploitation, with some being coerced into crime by their pimps. While Men Having Sex with Men (MSM) is an emerging and hidden issue in Bangladesh, it is frequently ignored or stigmatized making it harder to address effectively or to protect boys and men from the abuses of sexual violence or be identified at risk of sexual exploitation and abuse alongside women and girls.⁵⁰ The hijra⁵¹ community is severely stigmatized community in both Bangladeshi and Rohingya community, most often their income is dependent on begging or prostitution.

Equally concerning is the prevalence of child marriage, which remains a critical issue in Bangladesh. According to *Girls Not Brides*, 51% of girls marry before the age of 18, and 16% marry before the age of 15. In contrast, only 4% of boys marry before age 18. Child marriage is especially prevalent in rural areas, where 53.8% of girls marry before 18, compared to 44% in urban areas.⁵² Although the legal age for marriage is 18 for girls and 21 for boys, this law has had a limited impact on curbing the practice because it has several exceptions and loopholes. Section 19 of The Child Marriage Restraint Act-2017 authorizes child marriage under specific circumstances, such as parental consent or court authorizations, which ultimately undermines the intended purpose of the law and provides room for exploitation.⁵³ Additionally, legal penalties, including imprisonment or fines, are rarely enforced effectively because of these loopholes.⁵⁴

Bangladesh ranks among the top ten countries with the highest rates of child marriage globally.⁵⁵ Despite growing awareness about the harmful effects of child marriage — evident in both our primary data and the 2020 UNICEF report on child marriage in Bangladesh⁵⁶—the practice continues to be widely accepted in rural communities, as highlighted in the FGDs. The government's efforts to reduce child marriage, while significant,

⁴⁹ UNICEF. *Child Sexual Abuse, Exploitation, and Trafficking in Bangladesh*. [trafficking.qxp](#)

⁵⁰ UNICEF. *Child Sexual Abuse, Exploitation, and Trafficking in Bangladesh*. [trafficking.qxp](#)

⁵¹ The centuries-old term 'hijra' is extensively used in the Indian sub-continent to identify transvestites, intersex, eunuchs, and transsexual men ([Chakrapani, 2010](#)). The term "hijra" originates in Hindustan (India). It has historically been translated into English as "eunuch" or "hermaphrodite," with "the irregularity of the male genitalia key to the definition" ([Reddy, 2005](#)). Hijra pronouns such as "neither men nor women" are commonly used to define themselves ([Nanda, 1999](#)). Hijras are categorized into fifteen unique groups based on their genital appearance, social identity, sexual preferences, and masculine or feminine masculinity or femininity characteristics ([Khan et al., 2009](#)). There are significant differences in categorizing third gender categories from region to region in South Asia ([Kaniz et al., 2006](#)). In Bangladesh, the Hijra gender expression is often described as 'hermaphrodite' or 'eunuch,' which means 'female mind in a masculine body' ([Khan et al., 2009](#)).

⁵² [Child marriage atlas - Girls Not Brides](#)

⁵³ <https://www.thedailystar.net/law-our-rights/news/necessity-reform-the-child-marriage-restraint-act-3368546>

⁵⁴ Al-Mamun M, Hossain MJ, Alam M, Parvez MS, Dhar BK, Islam MR. Discrimination and social exclusion of third-gender population (Hijra) in Bangladesh: A brief review. *Heliyon*. 2022 Oct 1;8(10):e10840. doi: 10.1016/j.heliyon.2022.e10840. PMID: 36217490; PMCID: PMC9547216

⁵⁵ [Child marriage atlas - Girls Not Brides](#)

⁵⁶ [United Nations Children's Fund \(UNICEF\). Ending Child Marriage: A Profile of Progress in Bangladesh. UNICEF, 2020. https://data.unicef.org/wp-content/uploads/2020/10/Bangladesh-Child-Marriage-Final-LR-spreads-10_1.pdf](#)

face challenges rooted in deep-seated social, economic, and cultural norms and are further exacerbated by crisis, displacement, and insecurity, also in the Rohingya communities.⁵⁷

According to the VAW survey (Violence Against Women), adolescents report the highest prevalence of violence in the last 12 months, with non-partner physical violence being most common among adolescent girls.⁵⁸ This leads to child marriage, particularly among girls, despite legal prohibitions, especially in the rural parts of the country. The GBV sub-sector in Cox's Bazar confirms adolescent girls in the Rohingya community to be at highest risk of “sexual harassment, sexual abuse, abductions, forced marriages, and other forms of GBV.”⁵⁹ They also identified female-headed households and persons with disabilities as being at heightened risk of extortion, GBV, and, consequently, potential SEA.⁶⁰ According to a recent study with Rohingya women's groups, SEA that exists in the camps can be categorized into three risk levels: very high, High, and low. The community is at very high risk of trafficking, verbal abuse, sexual exploitation, unwanted visits at shelters, and online harassment.⁶¹ They are at high risk of kidnapping/abduction, manipulative sex/marriage, sexual threats, and verbal harassment.⁶² And low but still are at risk of rape and physical harassment.⁶³ This same report identified the most vulnerable age category as 0–18-year-olds, namely SEA, in the form of “rape, kidnapping, trafficking, physical harassment, manipulative sex/marriage, sexual threats, online harassment, and unwanted visits at the shelter.”⁶⁴ This age category was at the highest risk because many of them do not report even to their families out of fear or cultural stigma and are the easiest to be sexually manipulated.⁶⁵ The reiteration of this vulnerable age group and accounts of SEA in the camps are a dire concern for the situation.

The social stigma and shame surrounding sexual violence and GBV often prevent victims from speaking out. As one of the FGD participants put it, “In our society, girls often fear for their honor and respect, which prevents them from expressing fear or speaking out when they experience harm.” These fears, especially in rural areas, are compounded by the misuse of power by local authorities, including chairpersons (Union Parishad), who may be motivated by financial gain and personal interests, contributing to the perpetuation of harmful practices like child marriage. The lack of proper confidential support structures and legal recourse further silences victims, perpetuating a cycle of violence and abuse.

Local customs, religious misconceptions, and cultural stigma often lead families and local leaders to encourage marriages between the perpetrator of rape or abduction and the victim, rather than seek legal justice.⁶⁶ Some

⁵⁷ UNHCR, CARE and ActionAid (2020). *An Intersectional Analysis of Gender amongst Rohingya Refugees and Host Communities in Cox's Bazar, Bangladesh. An Inter-Agency Research Report, September 2020.*

⁵⁸ *Key Findings on Violence Against Women Survey Bangladesh (2024)*

⁵⁹ GBVSS Sub-Sector Bangladesh Q2 Bulletin. April – June 2024 [Q2 2024 GBVSS Bulletin \(Last edited Sep 2024\)](#)

⁶⁰ GBVSS Sub-Sector Bangladesh Q2 Bulletin. April – June 2024 [Q2 2024 GBVSS Bulletin \(Last edited Sep 2024\)](#)

⁶¹ *Closing the Accountability Gap: “Community Perspectives and Experiences with Sexual Exploitation, Abuse, and Harassment (SEAH) in Occupied Palestinian Territories (oPt), Bangladesh, and Ethiopia” (2022)*

⁶² *Closing the Accountability Gap: “Community Perspectives and Experiences with Sexual Exploitation, Abuse, and Harassment (SEAH) in Occupied Palestinian Territories (oPt), Bangladesh, and Ethiopia” (2022)*

⁶³ *Closing the Accountability Gap: “Community Perspectives and Experiences with Sexual Exploitation, Abuse, and Harassment (SEAH) in Occupied Palestinian Territories (oPt), Bangladesh, and Ethiopia” (2022)*




⁶⁴ *Closing the Accountability Gap: “Community Perspectives and Experiences with Sexual Exploitation, Abuse, and Harassment (SEAH) in Occupied Palestinian Territories (oPt), Bangladesh, and Ethiopia” (2022)*

⁶⁵ *Closing the Accountability Gap: “Community Perspectives and Experiences with Sexual Exploitation, Abuse, and Harassment (SEAH) in Occupied Palestinian Territories (oPt), Bangladesh, and Ethiopia” (2022)*

⁶⁶ *Key informant interviews with PSEA Coordinators*

of the most prominent protests in the Country are against the abuse of women have been horrific cases of gang rapes, femicide, and of cases where the woman has been murdered by the sexual violator. However, these represent only a small fraction of the many incidents that occur regularly in the workplace, homes, camps, and especially in contexts of displacement and dependency from humanitarian and development aid.




The prevalence of GBV and child sexual abuse creates a significant risk for sexual exploitation both within workplaces and among beneficiaries of humanitarian and development aid. Vulnerable groups such as children, women in crisis settings, and those dependent on aid face heightened exposure to various forms of sexual exploitation and abuse.

Dimension One: SEA Risk Register		
1a. Laws, Policies, and Government Institutions		
 Findings	 SEA Risks	 Recommendations
<ul style="list-style-type: none"> The high court order provides a vague definition that only pertains to sexual harassment rather than being inclusive of sexual exploitation, abuse, and harassment. ILO has been working with the MoWCA, MoLE, and the Legal Task Team to discuss alignment and determine necessary revisions to the draft Act on sexual harassment. 	<ul style="list-style-type: none"> The applicability and definition have limited scope to interpretation, barring access of non-citizens, workers, or employers under the protection of the Labor Code of Bangladesh. It doesn't define sexual exploitation and abuse specifically, either. Without consultation with the PSEA Network, UNRC, and other stakeholders leading PSEAH response in the country, there is a risk that the ongoing discussion of the amendments of the Bangladesh Labor Law might not include sexual exploitation, abuse and harassment definitions and the other gaps identified in the IARA. This includes abuses towards beneficiaries or public services, aid provision, development projects rather than just work colleagues, and 	<p>UNRC/UNCT</p> <ul style="list-style-type: none"> Advocate with government for the integration of PSEA in the National Legal Frameworks to promote and uphold accountability. Endorse and support a government engagement strategy developed by the national PSEA Network. <p>PSEA Network</p> <ul style="list-style-type: none"> In consultation with relevant government bodies, develop a system-wide PSEA strategy Support the government with adaptation of staff training package. Strengthen the referral pathways between aid organizations and government authorities to ensure thorough and accountable investigation of SEA cases involving government actors



<ul style="list-style-type: none">• Organizations are not incentivized to support the victim in their allegations or protect them from retaliation for reporting.• Lack of victim-centered principles within the law and less sensitivity towards victims	<p>remove barriers for organizations to act with zero tolerance towards SEA whilst protecting legal rights for perpetrators to a fair trial.</p> <ul style="list-style-type: none">• Limiting remedies to just female workers violating the rights and protection of male, LGBTQ+, and non-binary people from sexual harassment.• There is a risk of causing further harm, as organizations often face greater liability for acting against alleged perpetrators than for failing to support or protect the victim.• Growing sense of impunity, disregard for the rule of law, and an increased risk of SEAH.	<p>Government</p> <ul style="list-style-type: none">• Revise the applicability of already existing laws in coordination with the PSEA Network including specific terms like 'applicable to every person employed inside Bangladesh irrespective of administrative position, nationality, sex, gender, religion, nationality etc.' A Clear and specific definition of sexual abuse, exploitation, and the conduct amounting to these should be specified.• The Sexual Harassment Act needs to expand its scope, including abuse towards community members not just people in the workplace, namely beneficiaries of public service programs, development programs, and civil services. Creating clear legal recourse, reporting methods, increase incentive to prevent SEAH.• Develop a better accountability and monitoring systems within governmental organizations, law enforcement, and judicial systems.
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1b. Community knowledge, attitudes, and practices around Gender, GBV and SEA		
 Findings	 SEA Risks	 Recommendations
<ul style="list-style-type: none"> • There are a great number of GBV cases, Child Protection issues, and Sexual Exploitation and Abuse occurring towards communities. • Fear of violence against girls between the ages of 7-17 is exceptionally high, as the threat against them is founded on multiple sources of information. This drives to Child Marriage despite the legal laws of the country. There is a general cultural stigma associated with girls being “ruined” by sexual violence. 	<ul style="list-style-type: none"> • The overall sense of impunity with regards to GBV, IPV, Child abuse, and exploitation increases the risk for SEAH to occur. • The vulnerability of girls in particular increases their risk of being abused into coercive, exploitative marriages, be more vulnerable to sexual exploitation, rape, and sexual harassment in camp and camp-like settings by aid workers. • The harm increases in girls or women not wanting to report out of shame, cultural and social stigma. This also increases their risk of being married early or married to the perpetrator to “rectify” the harm, which is still a common practice and culturally accepted. This only increases the GBV harm for the survivor and encourages perpetrators to force marriages through kidnapping or other violent sexual acts. 	<p>Protection Sector, Child Protection, GBV Sub-Sector/Sub-Cluster, PSEA Network</p> <ul style="list-style-type: none"> • Coordinate efforts to improve referral pathways for GBV and SEA. <p>AAP Technical Working Group</p> <ul style="list-style-type: none"> • Implement a targeted awareness campaign on existing GBV and child protection laws, reaching community people and humanitarian staff through awareness sessions, training, radio broadcasts, TV segments, and printed materials, coordinated with national media and AAP Technical Working Group. • Conduct community awareness sessions for the Rohingya community need to be done creatively through live in person activities: information sessions need to target not just women and girls in safe spaces but need to be public to change attitudes and behaviours of men, community leaders, and youths. Options include theatre performances, community awareness sessions, healing circles, trauma healing workshops, and messaging and training community elders and leaders.



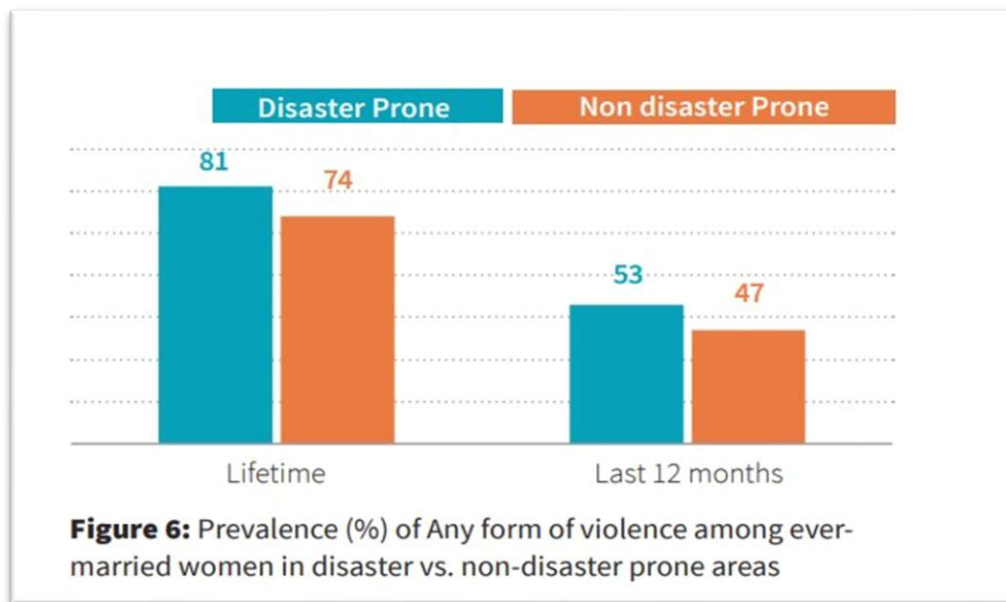
Dimension Two: Context

2a. Community Vulnerabilities

This area captures factors that may render certain individuals and/or groups more at risk of experiencing SEA – gender, age, disability, poverty, marital status, displacement status, lack of civil documentation, illiteracy, ethnicity, sexual orientation, religion.

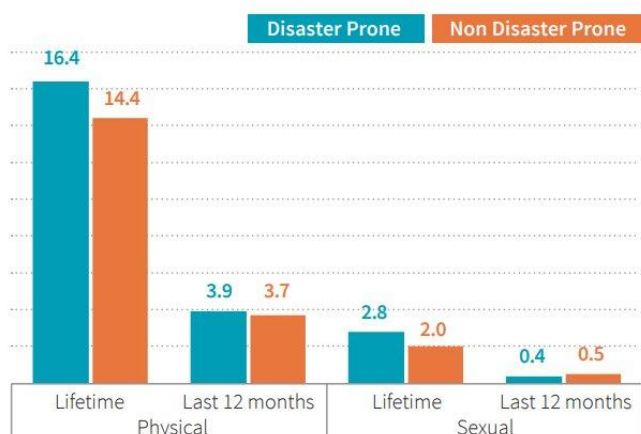
“The police do not take action without money. The CIC officials do not give importance. Sometimes, the police and block committee take contact numbers from young, beautiful girls. They also make relationships with some women.”
(Rohingya FGD Participant)

In Bangladesh’s most disaster-affected areas, many families still live in homes damaged by cyclones and cannot afford repairs. Economic impacts from the cyclones and a broader economic downturn have led to significant losses in household income and livelihoods. Damage to agricultural production, the loss of essential tools, and saline water intrusion have disrupted farming communities. In some of the hardest-hit areas, access to sanitation, hygiene, and safe drinking water remains extremely limited, increasing dependency on humanitarian aid and further elevating the vulnerability of these communities to sexual exploitation and abuse. The tables from the Key Findings of VAM Survey, Bangladesh 2024⁶⁷ indicate how violence is higher in disaster prone areas for both general violence against women and sexual violence against females.



Bangladesh Bureau of Statistics (BBS) and UNFPA. Key Findings: Violence Against Women Survey 2024.

⁶⁷Bangladesh Bureau of Statistics (BBS) and UNFPA. Key Findings: Violence Against Women Survey 2024. Published 27 February 2025.



Prevalence of non-partner physical and sexual violence, is higher in disaster-prone areas compared to non-disaster-prone (Figure 10).

Figure 10: Prevalence (%) of non-partner violence experienced since age 15 among all women aged 15 and above: Disaster-prone vs non-disaster-prone regions

Bangladesh Bureau of Statistics (BBS) and UNFPA. Key Findings: Violence Against Women Survey 2024.

Frontline workers identified the communities most vulnerable to SEAH as including “minorities, people living in resettlement projects, those residing near embankments, and families settled on government-owned land.” Vulnerabilities tied to extreme weather and natural disasters have been shown to increase the risk of gender-based violence (GBV) and sexual exploitation. Research conducted after Cyclone Sidr in 2007 and Cyclone Aila in 2009 highlighted an increase in trafficking and exploitation, with female-headed households being most affected, though other types of households, including those with children, were also impacted.⁶⁸ “Victims of trafficking [in Bangladesh post cyclone] were forced into prostitution and hard labour, some working in sweatshops along the Indian border.”⁶⁹

In the coastal areas of Bangladesh, which are frequently subjected to climate-related shocks, the prevalence of child marriages spiked, often as a response to economic hardship and loss of livelihoods.⁷⁰ Families facing economic strain sometimes resort to allowing early marriages as a coping mechanism, believing it may provide some financial relief or security. In our assessment, a majority of community members knew that child marriage was illegal, disagreed that it was acceptable for an aid worker to try and marry an underage girl, and seemed well-informed on child protection and GBV issues in general. However, in some of the FGDs, participants explained, “We understand why someone might resort to a sexual relationship with an aid worker to get more provisions or marry off an underage daughter to secure privileges for aid access.” This reflects the dire circumstances faced by many households, where the desperation for aid leads to the exploitation of vulnerable individuals, including children.

In areas such as Cox’s Bazaar, where the Rohingya refugee crisis has compounded existing vulnerabilities, the risk of sexual exploitation is heightened due to a range of factors, including corruption in aid distribution and other forms of exploitation, such as bribery. From the data, we found reports of aid being distributed to family

⁶⁸ IOM (2016) *The climate change–human trafficking nexus*. [mecc_infosheet_climate_change_nexus.pdf](#)

⁶⁹ IOM (2016) *The climate change–human trafficking nexus*. [mecc_infosheet_climate_change_nexus.pdf](#)

⁷⁰ IRC (2023) *Bangladesh: IRC study reveals a staggering 39% surge in child marriage due to climate change | International Rescue Committee (IRC)*

ties or connections and based on political affiliation, with aid used to gain political favor or support. “There have been significant irregularities in the distribution of hygiene kits,” one community member reported. “While each family was supposed to receive five hygiene kits, some families received more than their fair share, while others received none. Distribution is based on personal connections, not fair criteria,” explained another.

Similarly, in another FGD, adolescent youth shared that local representatives often distribute aid according to their preferences, with wealthier families receiving more benefits. Corruption within aid distribution systems is widespread; community members reported having to pay the Majhis (Rohingya community leaders) or Camp-in-Charge (CiC) workers to be included on the beneficiary list or to have their complaints addressed. One individual recalled paying BDT 1,000 to CiC workers to receive their data card, and another paid BDT 2,000 for the same service. The presence of such corruption, coupled with the vulnerability of these communities, creates an environment ripe for exploitation, sextortion, or sexual abuse. Transparency International Bangladesh (TIB) discusses the occurrence of sexual extortion, or “sextortion,” which happens when those entrusted with power use it to exploit those dependent on that power sexually.⁷¹ This gendered form of corruption disproportionately targets women but also affects men, transgender individuals, and gender non-conforming people. While women are most often the victims, the phenomenon is prevalent across all genders, further illustrating how those in positions of authority exploit vulnerable populations for their gain. In societies where extortion, bribery, and weak enforcement of the rule of law are prevalent, incidents of sexual exploitation and abuse are likely to be even more severely underreported.

Over the past 15 years (2009–2024), households in Bangladesh have paid an estimated total of BDT 146,252 crore in bribes or unauthorized payments to access services from 18 different sectors and institutions, according to TIB’s National Household Survey (NHS) 2023⁷². The highest incidences of bribery were recorded in passport services (74.8%), BRTA (71.9%), law enforcement agencies (58.3%), judicial services (34.1%), land services (32.3%), and local government institutions (29.7%). The alarming level of corruption in the government systems, namely the judicial system, is a great concern for SEA cases, the ability to access fair due process and legal recourse, and the additional concern of perpetrators easily influencing/bribing the legal system to dismiss their cases.

The survey also revealed that 70.9% of households reported encountering corruption while seeking public and private institutions’ services between May 2023 and April 2024.⁷³ An estimated BDT 10,902 crore in bribes was transacted in 2023 alone, which constitutes 1.43% of the revised national budget for the 2023–24 fiscal year and 0.22% of the country’s GDP.⁷⁴ The survey highlighted that corruption is especially rampant when services are accessed in person instead of online. 74% reported being extorted because the alternative was a denial of services.⁷⁵ The main causes of corruption, according to the majority of respondents, are reward systems for corrupt people, a lack of social awareness, and impunity. The institutional corruption in Bangladesh is deeply concerning and must be factored in when creating change for PSEAH. Without acknowledging the shortcomings of the system and the challenges to the rule of law, obtaining systematic ways to combat SEAH will be very difficult.

⁷¹ Transparency International (2020) *Breaking the Silence around Sextortion: The Links between Power, Sex and Corruption*. [Breaking the Silence around Sextortion: The Links... - Transparency.org](#)

⁷² [Transparency International Bangladesh. \(2024\). Corruption in Service Sectors: National Household Survey 2023](#)

⁷³ Transparency International (2024) *TIB National Household Survey 2023*. [Transparency International Bangladesh \(TIB\)](#)

⁷⁴ Transparency International (2024) *TIB National Household Survey 2023*. [Transparency International Bangladesh \(TIB\)](#)

⁷⁵ Transparency International (2024) *TIB National Household Survey 2023*. [Transparency International Bangladesh \(TIB\)](#)

TIB's survey also revealed that marginalized and low-income people are disproportionately affected by bribery and illegal payments.⁷⁶ Women, religious minorities, indigenous groups, and people with disabilities bear the brunt of this corruption, making their already precarious socio-economic conditions even worse. This highlights the intersectional nature of corruption and exploitation, as those with multiple layers of marginalization are even more vulnerable to abuses of power.

2b. Aid and Development Workers' Attitudes and Behaviours

This area captures SEA risks related to aid workers' attitudes and behaviours: (a) Drivers of risky behaviours – duty station category (family/non-family), living arrangements, level of isolation, R&R policies and (b) Adoption of risky behaviours – soliciting sex, frequenting hotspots/night clubs, maintaining inappropriate relationships with domestic workers and/or members of the community.

“I went to an NGO officer to include my daughter-in-law as a beneficiary. The officer took my daughter-in-law's mobile number and has been constantly disturbing her with vulgar behaviour over the phone.”

(Bangladeshi FGD Participant)

The attitudes and actions of aid workers—local and international—exacerbate the risk of SEA. Research conducted in 2019 revealed that the “perceived prevalence of SEA amongst the community is very alarming as 48% of respondents reported attempts by humanitarian workers to have sexual relations. 68% of responses also account for being approached ‘sometimes,’ 9% being approached “very often,” while 53% acknowledge it as a big problem in their community. There is a high fear of retaliation stemming from the distrust communities have regarding the anonymity of the reporting. In addition, the research findings suggest that humanitarian workers have a low knowledge of SEA reporting.”⁷⁷

The same assessment found both positive and negative perceptions of aid workers. Despite the Rohingya communities' appreciation for the services received, when being asked if there are negative characteristics associated with humanitarian workers or NGOs, they mentioned, for example, “disrespect, bad communication, misbehaviour (reproaching, shouting, condescending), bribery, deception, harassment, abuse, unprofessionalism, and discrimination, among others.”⁷⁸ One participant discussed how they often were yelled at and abused verbally if arriving late or because distributions were not orderly. They suggested that if aid workers could ensure everyone would get their shares, distributions would be less violent. Workers/volunteers engaged in aid distribution work are more associated with these negative attributes than those providing medical, education, or training facilities. “Adjectives used included unfriendly, unprofessional, rude, disrespectful, deceitful, harasser, exploitative, abuser, manipulative, and sex offenders. However, the participants tended to associate these attributes more with male than female workers. The pre-existing normative gender power imbalance, which empowers men and discriminates against women, seems to play a key role in this context of the aid sector.”

⁷⁶ Transparency International (2024) *TIB National Household Survey 2023*. [Transparency International Bangladesh \(TIB\)](#).

⁷⁷ Closing the Accountability Gap: “Community Perspectives and Experiences with Sexual Exploitation, Abuse, and Harassment (SEAH) in Occupied Palestinian Territories (oPt), Bangladesh, and Ethiopia” (2022)

⁷⁸ Closing the Accountability Gap: “Community Perspectives and Experiences with Sexual Exploitation, Abuse, and Harassment (SEAH) in Occupied Palestinian Territories (oPt), Bangladesh, and Ethiopia” (2022)

Community volunteers, Bangladeshis, and Rohingyas, working in distributions, cash assistance, and home visits, are also perceived by Program Managers, PSEA focal points, PSEA Network Coordinators, and by the community, as most likely or capable of sexually exploiting the community. The community volunteers do not have as robust contractual obligations as staff do. The main challenge is that reference checks are not thoroughly done for volunteers, as CiC and Majhis play a significant role in the hiring process. Volunteers must follow the code of conduct of associated agencies and organizations; however, in the absence of a centralized system to track their backgrounds and references, there remains a significant risk of recruiting individuals with a history of misconduct.⁷⁹ As non-full-time employees and given power through their association with the aid industry, they live in the communities and are also the most challenging to monitor.⁸⁰ From our study, other actors perceived to pose serious threats to SEAH were humanitarian aid staff, camp/community leaders, and contractors.

Unfortunately, the generalized exploitation of refugees is persistent and an ongoing concern. Attitudes of aid workers show risky behaviours, where bribery, exploitation, underage sexual relations, and engaging in transactional sex are still perceived to be acceptable by some aid workers despite efforts to prevent SEAH.⁸¹ Other actions reported in the camp by women and girls include: “asking women’s or girls’ mobile phone numbers, calling/messaging them, visiting them at shelters without any reason, asking to accompany them outside camps, making (false/deceitful) marriage proposals and physical touching which are not acceptable behaviours.”⁸²

Apart from sexually inappropriate behaviours, they also mentioned other “inappropriate behaviours that humanitarian workers engage in such as asking for money, asking for food, asking for free labor in exchange of facilities/services/favor, rebuking, moral policing on dress code, discriminatory behaviour at work towards Rohingya volunteers as opposed to Bangladeshi volunteers.”⁸³ In this IARA assessment, frontline staff reported cases, where some volunteers accepted bribes to include names on beneficiary lists, and several community members, shared their experiences of “paying” to receive aid. For example, one respondent said they had to “pay money to get their sister’s disability allowance.” In contrast, others described instances where NGO workers took aid payment but failed to provide the promised assistance, such as wheelchairs.

Women in female-headed households, particularly in the camps, are especially vulnerable to exploitation. Women participating in the IARA FGDs were surprised to learn that they should not have to “give something from their provisions to workers who helped them carry their goods home.” Similarly, in other studies, women and girls have reported requests for “bribes by the service providers when visiting health clinics or when requesting permission for hospital transfer from the offices of camp authorities, resulting in restricted access to crucial protection services.”⁸⁴ Women and girls in the refugee response, have reported previously being

⁷⁹ PSEA Network Monthly Meetings

⁸⁰ *Closing the Accountability Gap: “Community Perspectives and Experiences with Sexual Exploitation, Abuse, and Harassment (SEAH) in Occupied Palestinian Territories (oPt), Bangladesh, and Ethiopia”* (2022)

⁸¹ OSCSEA. (2024) *Bangladesh Survey on Sexual Exploitation and Abuse 2024. Internal Brief*

⁸² *Closing the Accountability Gap: “Community Perspectives and Experiences with Sexual Exploitation, Abuse, and Harassment (SEAH) in Occupied Palestinian Territories (oPt), Bangladesh, and Ethiopia”* (2022)

⁸³ *Closing the Accountability Gap: “Community Perspectives and Experiences with Sexual Exploitation, Abuse, and Harassment (SEAH) in Occupied Palestinian Territories (oPt), Bangladesh, and Ethiopia”* (2022)




⁸⁴ *Closing the Accountability Gap: “Community Perspectives and Experiences with Sexual Exploitation, Abuse, and Harassment (SEAH) in Occupied Palestinian Territories (oPt), Bangladesh, and Ethiopia”* (2022)

asked often for their numbers by aid workers.⁸⁵ In our assessment, single or divorced women reported they were allegedly offered “special favors” in exchange for aid, indicating risky behaviors by aid workers. Frontline staff affirmed much of the secondary data, indicating that in the Rohingya crisis, single or female-headed households are at the highest risk of sexual exploitation. These exploitative behaviors not only violate zero-tolerance ethical standards but also perpetuate an environment of fear, mistrust, and abuse.

There is a general sense of impunity in the field and the office from female colleagues. Frontline staff report they have been disadvantaged at work because they “turned down indecent” proposals by management. The dismissal of a female staff who reported sexual harassment within aid agencies affirms persistent challenges to addressing SEAH.

According to the 2024 OSCSEA Survey, while fewer respondents this year believe that sex with sex workers is acceptable for aid workers if legally permitted in the Country of duty, it remains concerning that 73 respondents are still unclear about zero-tolerance policies for prostitution or transactional sex.⁸⁶ Of the respondents, 59% held non-supervisory roles, while 41% were in supervisory or management positions. This year also marks the first time in four years that 85 respondents reported it was “not applicable” for them to take mandatory PSEA training before beginning their duties.⁸⁷ Furthermore, this year, the highest percentage (32.96%) of aid workers reported not receiving additional PSEA training. The survey also revealed that 179 respondents were aware of aid workers, implementing partners, or vendors engaging in risky behaviours such as transactional sex or other forms of SEA. Although this percentage is lower than in previous years, it remains profoundly concerning and highlights ongoing issues with the sexual exploitation of vulnerable communities by aid workers.

The combination of extreme poverty, systemic corruption, and the lack of accountability creates an environment where sexual exploitation and abuse can thrive, as seen in our analysis. Both government and aid organizations must address the systemic challenges of the current aid distribution processes, acknowledge the crisis, and prioritize protecting the dignity of vulnerable community members.

Dimension Two: SEA Risk Register		
2a. Community Vulnerabilities		
 Findings	 SEA Risks	 Recommendations
<ul style="list-style-type: none"> High levels of exploitation occur in public services, namely in the form of bribery. The following public services have taken the most bribes in the past year: passport services (74.8%), BRTA (71.9%), 	<ul style="list-style-type: none"> Exploitation of the community through bribery is a gateway to any other form of exploitation including sextortion, sexual exploitation and abuse of the community being served. This is highly problematic and creates 	<p>PSEA Network, EPR</p> <ul style="list-style-type: none"> Develop, translate and disseminate coordinated messaging on Protection from Sexual Exploitation, Abuse, and Harassment (PSEAH) and they

⁸⁵ Closing the Accountability Gap: “Community Perspectives and Experiences with Sexual Exploitation, Abuse, and Harassment (SEAH) in Occupied Palestinian Territories (oPt), Bangladesh, and Ethiopia” (2022)

⁸⁶ OSCSEA (2024). Bangladesh Survey on Sexual Exploitation and Abuse: Internal Brief

⁸⁷ OSCSEA. (2024) Bangladesh Survey on Sexual Exploitation and Abuse 2024. Internal Brief



<p>law enforcement agencies (58.3%), judicial services (34.1%), land services (32.3%), and local government institutions (29.7%). This is also seen with the CiC workers and the Majhis in the Rohingya camps, amongst aid workers, and volunteers.</p> <ul style="list-style-type: none">• Natural Disasters have increased the dependency of communities to aid and expose them to greater vulnerabilities of trafficking, prostitution, and sexual exploitation and abuse.• Rohingya refugee response is endemic with sexual exploitation and abuse, complete dependency on aid, movement restrictions. There are incredible amounts of bribery and extortion occurring by CiCs Office workers, Majhis, volunteers and the most vulnerable groups to this are young single girls/women and Female Headed Households.	<p>an environment where the data isn't reflective of the extent of the problem.</p> <ul style="list-style-type: none">• The high level of dependency further creates vulnerability to SEA in both natural disaster zones of Bangladesh, but most especially amongst the Rohingya population.	<p>need to be integrated into disaster preparedness communications. Additionally, incorporating PSEA briefing sessions into emergency preparedness trainings and pre-deployment orientations is essential.</p> <ul style="list-style-type: none">• The PSEA Network and organization/government should undertake regular field visits for earlier detection, prevention and response.• Ensure the disaster response committees are diverse in capacity: PSEA capacity, GBV capacity. Emergency capacity, and diverse in gender. <p>AAP TWG and PSEA Network</p> <ul style="list-style-type: none">• Map the existing reporting channels in the natural disaster emergency context and coordinate with government on the existing reporting lines• Incorporate PSEA in the National Contingency Plan and other reporting channels. <p>Livelihood Sector</p> <ul style="list-style-type: none">• Livelihood programs need to build better resilience, independence for the most vulnerable groups within the crisis.
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		Government <ul style="list-style-type: none"> PSEA Network needs to work alongside the government to manage the abuses of power within the camp by CiC office workers and anyone they appoint: Majhis and volunteers, as well as create safer mechanisms to prevent abuse by the APBn (police force).
2b. Aid and Development Workers' Attitudes and Behaviours		
Findings	SEA Risks	Recommendations
<ul style="list-style-type: none"> Aid Workers' Attitudes and Behaviours: 48% of respondents reported attempts by humanitarian workers to have sexual relations. 68% of responses also account for being approached 'sometimes,' 9% being approached "very often," while 53% acknowledge it as a big problem in their community.⁸⁸ The pre-existing normative gender power imbalance, which empowers men and discriminates against women, seems to play a key role in this context of the aid sector Unlike staff, community volunteers are not bound 	<ul style="list-style-type: none"> Women and girls are at high risk of SEA When volunteers are not bounded by the code of conduct and with lack of vetting system, the risk of SEA to occur become higher Normalization of SEA within aid workers and engaging in transactional sex Lack of trust and confidentiality increase fear of retaliation and reduce number of allegations reported 	PSEA Network <ul style="list-style-type: none"> More and regular capacity building sessions, operationalization of zero-tolerance policies and procedures Establish an Interagency Background Check System Conduct community-based awareness rising and encourage feedback and anonymous reporting channels Ensuring regular monitoring of volunteers, as well as aid workers and hearing community voice. Mapping, reinforce and support safe, confidential, and survivor-centered reporting mechanisms. Establish Peer and Community Watch Systems and use digital

⁸⁸ Closing the Accountability Gap: "Community Perspectives and Experiences with Sexual Exploitation, Abuse, and Harassment (SEAH) in Occupied Palestinian Territories (oPt), Bangladesh, and Ethiopia" (2022)



<p>by strong contractual obligations.</p> <ul style="list-style-type: none">• Community Volunteers are not full-time employees and given power through their association with the aid industry, they live in the communities and are also the most challenging to monitor• There is a gap in PSEA reference checking in the hiring process, especially for volunteers• Regardless the mandatory training on PSEA is incorporated in the on boarding procedures, some of the staff, including with management position, still believe there is no problem to engage with sex-workers		<p>check-in systems (e.g., GPS-tracked reporting, virtual supervision tools).</p> <ul style="list-style-type: none">• Integrating SEA risk into security assessment <p>Heads of Organizations</p> <ul style="list-style-type: none">• Organizations should raise community awareness on aids and services rights' entitlement to beneficiaries• Include mandatory clauses on Sexual Exploitation and Abuse (SEA) and the Code of Ethics and Conduct in all employment contracts, including volunteers, casual workers, contractors and vendors• Organizations should ensure that PSEA briefing sessions are conducted for all temporary volunteers and short-term personnel.• Implement a safe recruitment process and ensure thorough reference checks are conducted.
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Dimension Three: Operational Context

3.1. Response Institutions

Agencies in Bangladesh have demonstrated a strong commitment to Protection from Sexual Exploitation and Abuse (PSEA), with over 200 organizations participating in the PSEA Network across Dhaka and Cox's Bazar. Nearly all organizations (99%) with a designated PSEA focal point participating in the Inter-Agency Risk Assessment (IARA) reported having a Code of Conduct or a PSEA Policy. The 2024 Survey on Sexual Exploitation and Abuse in Bangladesh by OSCSEA reflects measurable progress, showing improved perceptions, understanding, commitment, and willingness to report SEA compared to the past four years. Aid workers now express more substantial alignment with PSEA principles, with more respondents "strongly agreeing" with reporting mechanisms. Overall, there is a growing sense that agencies are actively working to prevent SEA and that the efforts of the coordination body—the PSEA Network plays a vital supportive role to agencies.

3.1a. Senior Leadership

Senior leadership has played a pivotal role in institutionalizing PSEA principles. All senior managers from UN agencies, INGOs, and NGOs included in this study reported appointing a PSEA focal point, but with only 34% of these roles having a dedicated staff to PSEA. Publicly, leaders emphasized their responsibility to model zero tolerance for SEA and champion PSEA initiatives. The most frequently cited responsibility for senior management was appointing focal points, a response aligned with the PSEA Network Term of Reference (ToR), which outlines broader leadership responsibilities, including:

- Fostering a safe environment to prevent and respond to SEA;
- Nominating and empowering PSEA focal points;
- Ensuring staff and affiliates receive PSEA training;
- Coordinating PSEA efforts with government officials, partners, and affected communities.

However, critical gaps remain in supporting PSEA focal points position, particularly concerning candidate quality, capacity (especially for those "double-" or "triple-hatted"), budget allocation, and organizational backing. These areas represent key opportunities for improvement in the next phase of PSEA implementation.

Senior leaders also identified leading organizational PSEA strategy and disseminating consistent messaging as core responsibilities. Surveys revealed that staff primarily receive PSEA reminders from direct line managers (rather than senior leadership), though 67% of senior leadership reported regularly including PSEA messages in communications. This suggests that messaging is permeating organizations effectively, contributing to a broader awareness of institutional commitment.

3.1b. Internal and External Funding for PSEA

One of the major barriers to advancing SEAH prevention efforts is the lack of adequate funding, with only 50% of senior leaders reporting they regularly include PSEA in the budget, with 31% reporting that they sometimes ensure a budget for PSEA. Similarly, only 52% of program managers reported regularly including funding for PSEA within the budget, and only 28% reported a specific devoted budget line for PSEA. The majority only included the funding as either earmarked or not but for a broader Protection, GBV, and PSEA purpose. Budgets for almost 63% of programs are not including specific budget lines for PSEA but implicitly included under Protection or GBV funding, with 24% of those not even earmarked. When funding is allocated as a lump sum

for all things related to protection, it undermines PSEA and protection efforts and makes it challenging to institute preventive mechanisms effectively.

Although about 34% of program managers regularly conduct SEA risk assessments, most (43%) report only ‘sometimes’ conducting SEA risk assessments in their programs to monitor and prevent. The majority (60%) cannot do more regular risk assessments due to a lack of funding. Most program managers also reported they do not have devoted budget lines for SEA, creating challenges for SEA risk assessments.

Structurally, the PSEA Network is budgeted by the UNRCO and ISCG. The coordinator’s role sitting in Dhaka is a cost share from the UNCT, where all heads of UN agencies ensure that PSEA is being led, while in Cox’s Bazar IOM is supporting the national position. Almost all UN agencies in Bangladesh have dedicated funds to PSEA. However, the sudden closure of USAID funding, which previously funded most of the PSEA global efforts, has created confusion, instability, and uncertainty on how much PSEA funding will be allocated per INGO, UN agency, or even through the UNCT. With the SEA risk rampant in Bangladesh, the population is being put at further risk if efforts and progress made thus far are suddenly hindered by funding. To avoid this, the Network is working on increasing the coordination among the members as much as possible, taking the lead on key activities, such as training, and working jointly to find solutions to context specific problem, such as IPs assessments, investigations, volunteers and casual labors.

3.1c. Human Resource Policies

The UN’s policies and practices are implemented in Bangladesh, supported by several global initiatives that have contributed to the development of standardized safety mechanisms. UN agencies use ‘Clear Check’ when hiring to prevent previous SEA offenders from being hired. Similarly, some INGOs and a few UN agencies are also participating in the Misconduct Disclosure Scheme (MDS)⁸⁹, which acts as a commitment to ensuring offenders are not rehired and are vetted thoroughly.⁹⁰ However, while all PSEA network members are encouraged to use the UN Clear Check and MDS as appropriate, the UN Clear Check system for vetting candidates is not applicable to non-UN entities, and as for MDS, it is not used for refugee volunteers who represent a large part of the workforce working in direct contact with affected populations.

Volunteers also do not go through background checks. For instance, among the 8,298 teachers working in the camps, 48% are refugees. There is no clear means to vet refugee volunteers, as they are not subject to background checks, police, or criminal records. Instead, it is primarily based on the recommendation of the CiCs or Majhis. This continues a problematic dynamic within the community, where reports of exploitation in the form of bribery, particularly, are high amongst CiCs office workers and Majhis. Putting them in charge of recruitment furthers their influence, power, and control over the community and can pave the way for refugee volunteers to act in exploitative manners, as reports have indicated from our study and numerous secondary sources. Additionally, contractors or casual labor used for a few hours or days are hard to manage and often lack awareness of PSEA principles. The contracting agency is responsible for ensuring their contracts include PSEA principles. However, in practice, monitoring casual labors is challenging and greater oversight from the contracting aid agency or government agency is necessary. This could involve having a representative from the organization present on-site to oversee contracted labor and ensure compliance with PSEA standards.

⁸⁹ [Misconduct Disclosure Scheme](#)

⁹⁰ *Closing the Accountability Gap: “Community Perspectives and Experiences with Sexual Exploitation, Abuse, and Harassment (SEAH) in Occupied Palestinian Territories (oPt), Bangladesh, and Ethiopia” (2022)*

With regards to staff hiring processes, roughly 78% of organizations with a PSEA focal point report having some PSEA questions included within the recruitment process, and 84% screen for previous history of misconduct. Some of the NGOs in Bangladesh follow the country's policies for the following employment requirements: police report, self-declaration, and prior employment reference checks. However, the use of national criminal records checks is limited; some international NGOs require them as part of the work visa application for international staff.

Roughly 57% of organizations have a 25-50% ratio of female frontline workers hired in the field. On the other hand, 27% of agencies report female frontline staff as more than 50% of their frontline staff. Increasing female representation and leadership in the field might reduce SEA issues but requires further exploration and understanding. The focus, however, should be on the 27% of organizations that equally have less than 20% female representation in the field, creating a male-dominated environment in vulnerable locations. Targeting these organizations with PSEA training, increased monitoring, and encouraging increased female field staff might help reduce the risks of SEA. Their internal SEA policies and capacity must also be strong, including having female representation in upper management, to create safe work environments for female staff.

3.1d. Partnerships

From the primary data, we found that although many organizations reported having SEA practices within their organizations, only 35% of organizations working in the Country have regular oversight of SEA with the implementing partner. 21% of organizations report “sometimes” assessing the implementing partner for its PSEA capacities. Although 53% of UN agencies reported using the UN Implementing Partner Capacity Assessment and 33% reported some alternate method, we also found misunderstandings, such as an implementation partner from the government not needing to be assessed for SEA, while the Government and Ministries are in partnership with lot of organizations, at humanitarian and development context. UN agencies reported that 27% of them didn't ever assess their IP for SEA, and this was validated in person by representatives from UN agencies in our workshop held on the 14th and 15th in Dhaka and Cox's Bazar. With roughly 80% of humanitarian assistance channeled through the UN agencies, who subsequently contract international and national NGOs as implementing partners, there is a need to ensure the focus for improving SEA standards is through those working directly in contact with vulnerable communities.

3.2 Response modalities

3.2a. PSEA Mainstreaming in Collective Frameworks, Cluster, and Working Groups, Program Modalities and Gender Transformative Programming




Several forums, both at Dhaka and Cox's Bazar level (Gender in Humanitarian Action (GiHA) Working Group, Protection Sector, GBV Sub Sector and Child Protection Sub Sector for Refugee Response, national GBV Sub-Cluster, and Child Protection sub-cluster), work to mainstream protection and gender considerations across humanitarian programming. According to our survey, 54% of Cluster Coordinator collaborate with the PSEA Network Coordinators to plan or implement joint activities, while 38% report rarely or never coordinating with the PSEA Network.

The PSEA Network engages with these entities, providing critical messaging, survivor support services and ensuring mainstream PSEA of activities in all response.

However, persistent challenges remain in addressing the root causes of SEA through programming. While most initiatives demonstrate basic gender sensitivity, only 31% of program managers characterize their programs as genuinely gender transformative—a distinction indicating programs that actively challenge and change unequal gender norms and power structures. Most managers instead identify their programs as meeting gender equity benchmarks, suggesting more passive approaches to inclusion than active transformation. It is particularly concerning that 8% of programs are still reported as gender-blind—an alarming finding in light of global commitments to gender integration and the heightened protection risks in this context. This persistence of gender-blind programming, though representing a small minority, indicates systemic gaps in applying minimum standards and raises questions about accountability mechanisms for quality assurance in humanitarian programming.

According to Cluster and Sector coordinators, some of the most significant challenges with moving forward PSEA are (1) funding gaps, (2) ineffective response capacities to violations, creating an environment of impunity, lack of trust in reporting, fear of retribution or retaliation, fear of being stigmatized socially or culturally. The primary cluster/sector collaborating with the PSEA Network is the GBV sub-sector/cluster. It has been noted that greater participation and coordination from the other clusters are necessary. In order to find a solution to this gap, the PSEA network recently requested all cluster and sectors to appoint a PSEA focal point, with the role of ensuring, in collaboration with the PSEA coordinator and the network PSEA is mainstream in all cluster and sectors activities.




The gap between coordination efforts and tangible change on the ground underscores the urgent need for stronger monitoring of program quality, enhanced capacity building in gender-transformative design, and more rigorous accountability mechanisms. These steps are essential to ensure that all humanitarian interventions meet minimum standards of gender sensitivity while progressively advancing toward transformative outcomes. Special attention must be given to how PSEA principles are implemented in practice, moving beyond policy commitments to drive real shifts in community-level gender dynamics and the power structures that perpetuate sexual exploitation and abuse.




Dimension 3: Operational context		
3.1a. Senior Leadership Engagement		
 Findings	 SEA Risks	 Recommendations
<ul style="list-style-type: none"> Lack of adequate commitment, accountability and practices from senior leadership Only 34% of PSEA focal points are full-time staff, highlighting a significant gap in dedicated capacity for effective implementation and oversight. 	<ul style="list-style-type: none"> PSEA is not a priority in the planning which compromise the mainstream and the reflection of PSEA in the program design and implementation PSEA is not reflected at organizational level, which also reduces the support to the coordinated effort to prevent and respond to PSEA 	<p>UNRC</p> <ul style="list-style-type: none"> Ensure senior managers are accountable to PSEA with yearly planning and budget for PSEA through UNRC or PSEA network. UNRC/PSEA Network to monitor activities on a regular basis to make the organizations within the network accountable.






<ul style="list-style-type: none">• Lack of support to focal points, especially candidate quality and capacity, budget allocated and organizational backing		<ul style="list-style-type: none">• More consistent and targeted engagement by the RC/HC with government on PSEA prevention and accountability. <p>UNCT/ROCT</p> <ul style="list-style-type: none">• Promote more visibility for PSEA in general; PSEA should be included as a stand-alone topic for discussion in UN/HCT meetings <p>Senior Leadership</p> <ul style="list-style-type: none">• Senior Leadership should deliver stronger and more frequent messaging on PSEAH, reinforcing the organization's commitment and ensuring accountability at the highest level.• PSEA agenda to be made mandatory in organizational practices by the senior management- recruitment, procurement, communication and visibility, knowledge management, capacity building, creating enabling environment, organizational meetings.• Raising awareness among all staff and ensure trained and dedicated PSEA focal points are appointed and reporting to the senior management.• Enhance their commitment on PSEA to every stage of the organization, like proper execution of existing policy and prepare special guidelines considering any context.• ToR, reporting channel, performance appraisal and a budget for the PSEA focal
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		<p>point need to be clearly defined by the senior management.</p> <p>PSEA Network</p> <ul style="list-style-type: none"> • Conduct dedicated training for senior leadership on policies, allegations trends and investigations
3.1b. Internal and external funding for PSEA		
 Findings	 SEA Risks	 Recommendations
<ul style="list-style-type: none"> • Only 50% of senior leaders consistently include PSEA in the budget line, and a majority of the program managers do not have dedicated budget lines for PSEA. • Only 34% of managers regularly conduct SEA risk assessment. 	<ul style="list-style-type: none"> • Undermine PSEA and protection efforts and makes it challenging to institute preventive mechanism effectively • Hamper capacity building of staff, volunteers due to lack of dedicated financial and human resources 	<p>Heads of Organizations</p> <ul style="list-style-type: none"> • Allocate dedicated budget for PSEA specific activities (IEC, awareness building, capacity building, refreshers- overall gender budget) • Ensure PSEA remain a discussion point in the engagement with donors.
3.1c. Human Resources Practices		
<ul style="list-style-type: none"> • PSEA requirements, screening and trainings might be in place but are not fully reflected in HRs practices • Use of reference checks is not consistent in the recruitment process • Lot of teachers, especially in the camps, are volunteers, selected via community leaders recommendations 	<ul style="list-style-type: none"> • High chances to re hiring SEAH perpetrators • Increased opportunities for exploitation and abuse may arise when volunteers are placed in positions of power and influence over others, especially in refugee camps. 	<p>PSEA Network</p> <ul style="list-style-type: none"> • Advocacy to join the Misconduct disclosure scheme and clear check database for NGOs, INGOs, UN and IPs <p>Heads of Organizations</p> <ul style="list-style-type: none"> • PSEA-related objectives and achievement should be incorporated in the performance appraisal

<ul style="list-style-type: none"> 27% of the organization has less than 20% as female frontline workers 	<ul style="list-style-type: none"> Creation of a male dominated environment in vulnerable locations 	<p>and Job Description on a mandatory basis</p> <ul style="list-style-type: none"> Develop a checklist for HRs on step to follow during the recruitment and onboarding stages. Increase the number of Women at leadership and decision-making positions Increase the number of women among aid workers
3.1d. Partnerships		
 Findings	 SEA Risks	 Recommendations
<ul style="list-style-type: none"> One third of the organizations working in Bangladesh are not implementing partner of UN or NGOs, with no control or support to ensure PSEA is reflected and mainstreamed among the organization. Only 35% of organizations are having regular oversight with their implementing partner PSEA Network members do not conduct assessments of the PSEA capacity of government-implementing partners 27% of UN do not conduct the IP assessment 	<ul style="list-style-type: none"> The growing number of partnerships with organizations lacking PSEA capacity increases the risk of inadequate safeguarding measures, potentially exposing affected populations to harm and undermining accountability efforts There is insufficient PSEA oversight of organizations, including government entities, that operate with highly vulnerable populations—heightening the risk of exploitation, abuse, and lack of accountability. 	<p>Heads of Organizations</p> <ul style="list-style-type: none"> All IPs must be properly assessed prior starting the partnership. In case the partner has not yet all capacities, the organization must support the development of such capacities. Regularly monitor partners' PSEA capacities and activities through a dedicated tracking system to ensure compliance and continuous improvement. <p>PSEA Network</p> <ul style="list-style-type: none"> PSEA Clause with the IPs needs to be reviewed and harmonized.



		<ul style="list-style-type: none"> Develop a simpler assessment tool to assess the IPs including government partners and needs to be done frequently.
3.2a. PSEA Mainstreaming in Collective Frameworks, Cluster, and Working Groups, Program Modalities and Gender Transformative Programming		
 Findings	 SEA Risks	 Recommendations
<ul style="list-style-type: none"> 54% of clusters reported that they are consistently coordinating with the PSEA Network. The network is mostly working with Protection/GBV/Child Protection Sub-Cluster/Sectors who provide survivor support services Only 31% of program managers define their programs as genuinely gender-transformative, while 8% of program managers identify their programs as gender-blind. 	<ul style="list-style-type: none"> The limited mainstreaming of PSEA across clusters and sectors poses a risk to coordinated safeguarding efforts. Systemic gaps in applying minimum standards 	<p>PSEA Network</p> <ul style="list-style-type: none"> PSEA network coordinators should increase coordination mechanism established for other inter-agency platforms (GETG, LCG WAGE, GIHA) and all clusters and working groups. <p>Cluster/Sector Coordinators</p> <ul style="list-style-type: none"> PSEA agenda needs to be mainstreamed with other inter-agency platforms agenda and be adequately represented by the network coordinators. Strengthen monitor of program quality <p>GiHA WG</p> <ul style="list-style-type: none"> Increase capacity building on gender transformative programme designs <p>AAP TWG</p> <ul style="list-style-type: none"> Increase accountability system to ensure humanitarian interventions meet core humanitarian standards

Dimension Four: Protective Environment

At the Cox's Bazar level, the Protection from Sexual Exploitation and Abuse (PSEA) network was established in October 2017 following the largest-scale influx of Rohingya refugees in August 2017. The Dhaka Network is still at initial stages, and there is a growing movement of including UN agencies, INGOs, and NGOs. As well, the Network structures changed, having the National Network based in Dhaka, and the subnational networks, currently in Cox's Bazar, reporting directly at National level and coordinating the activities, rather than operationalise as a separate and different entity.

Given the scale of the concern in Bangladesh, adequately resourcing and ensure support from member to the PSEA Network is essential for implementing structural reforms that enhance protection from sexual exploitation and abuse. At the same time, strengthening the PSEA Network in Cox's Bazar will support the Rohingya Refugee Response, where the concern has persisted since the early stages of the crisis, particularly in areas of community awareness and reporting.

4.1 Capacity and Resources

4.1a. PSEA Focal Point Capacity

At the beginning of the refugee response in Cox's Bazar, the prevention of sexual exploitation and abuse (PSEA) was not given the focus it required.⁹¹ However, it became a central component of the response strategy in the 2022 Joint Response Plan in Cox's Bazar and since 2024 it is also reflected in HRP in the emergency response in the rest of Bangladesh. The IOM evaluation, which assessed SEAH issues and identified gaps, found a significant lack of expertise and experience in PSEA among Bangladeshi aid workers.⁹² Additionally, there were significant gaps in understanding SEA, protection, and gender issues among key humanitarian actors. This included insufficient trauma-informed sensitization and a lack of coordination on gender-specific protection measures, all of which presented serious challenges to the protection response for the Rohingya people displaced by ethnic cleansing.⁹³

Among organizations with designated PSEA focal points, 88% have received training during the onboarding stage. However, approximately 12% of focal points have not received any training, onboarding, or other support to fulfill their roles. While most focal points (66%) are not dedicated PSEA staff, only 34% do have a primary role in PSEA. Within IARA, interview transcripts raised concerns about the conduct of some enumerators during interviews, including using leading questions, altering survey questions to influence responses, and repeatedly pressuring participants regarding the correct reporting method. These issues underscore the urgent need for enhanced capacity building. Such actions reflect inadequate data collection methods and insufficient training within the network.

Our assessment found that, of the 128 PSEA focal points that participated in the survey, 38% do not have a technical background in Protection, GBV, Gender, or Human Resources. While no global standards explicitly

⁹¹ Closing the Accountability Gap: "Community Perspectives and Experiences with Sexual Exploitation, Abuse, and Harassment (SEAH) in Occupied Palestinian Territories (oPt), Bangladesh, and Ethiopia" (2022)

⁹² Closing the Accountability Gap: "Community Perspectives and Experiences with Sexual Exploitation, Abuse, and Harassment (SEAH) in Occupied Palestinian Territories (oPt), Bangladesh, and Ethiopia" (2022)

⁹³ Closing the Accountability Gap: "Community Perspectives and Experiences with Sexual Exploitation, Abuse, and Harassment (SEAH) in Occupied Palestinian Territories (oPt), Bangladesh, and Ethiopia" (2022)

require such a background for PSEA focal points, it is generally understood that the role's experience in GBV, protection, HR, or SEA is beneficial. Further investigation is needed to assess the expertise of PSEA focal points with "other" technical backgrounds, how their appointments have enhanced their capacity to lead PSEA efforts within their organizations, the rationale behind their appointments, and the ongoing opportunities for learning, accountability, and evaluation. The PSEA Network has actively provided training and capacity-building support to most agencies that have designated focal points to the network. However, high staff turnover coupled with double or triple hatting roles simultaneously has proven that the focal points efforts are not sufficient to make effective change at the community level or accomplish network-level action items.

Despite improvements such as the increased number of PSEA focal points, a larger membership in the Cox's Bazar PSEA Network, and growth at the Dhaka level, capacity building should remain a focus and continue to be strengthened.

4.2 Mechanisms and Accountability

4.2a. Staff Reporting Mechanism

In cases of sexual harassment, field teams reported witnessing situations where the act of reporting led to the dismissal of the survivor rather than the perpetrator. This has contributed to a sense of insecurity and mistrust in the organization's ability to support survivors of sexual exploitation and abuse. Roughly 59 respondents to the OSCSEA survey in 2024, reported having faced sexual harassment in their duty station in Bangladesh⁹⁴. Of them, 45% never reported sexual harassment, with a majority (42.3%) mentioning fear of negative consequences for raising allegations. Field staff explained the main challenges for reporting include fear of losing a job, unnecessary harassment, and the fear of social or familiar humiliation. One frontline staff explained her experience: "Even when work is done correctly, negative feedback is given as retaliation for previously rejecting [an] inappropriate proposal." Almost 35% of respondents on the Annual PSEA Assessment reported that they felt their reporting of PSEA was not handled correctly by their agency.

It is well known that the UN takes 2-3 years to handle cases of PSEAH, regardless of whether the complaint is from a staff or the community. This creates difficult working conditions for victims and possibly allows the perpetrator to keep abusing and exploiting beneficiaries. NGOs are facing similar issues, mostly related to investigation capacities limited at HQs level, with limited or no capacity at Country level according to the PSEA Network. Legally, there aren't clear laws for handling SEAH, which contribute to creating an environment where victim blaming, threats, victims being fired or forced to remain in uncomfortable working conditions continue.

4.3a. Awareness Campaigns and Community Engagement

"We didn't know about the PSEA principles of NGOs before today. NGO workers didn't share this information to avoid revealing their weaknesses, which could lead to people reporting them" (Bangladeshi FGD Participant)

Multiple organizations have implemented awareness campaigns and safeguarding initiatives to protect Rohingya refugees, including efforts to promote a "speak up" culture among humanitarian staff. The Dhaka and Cox's Bazar PSEA Networks are coordinating efforts to harmonize PSEAH messaging across agencies, as current

⁹⁴ OSCSEA (2024). Bangladesh Survey on Sexual Exploitation and Abuse: Internal Brief

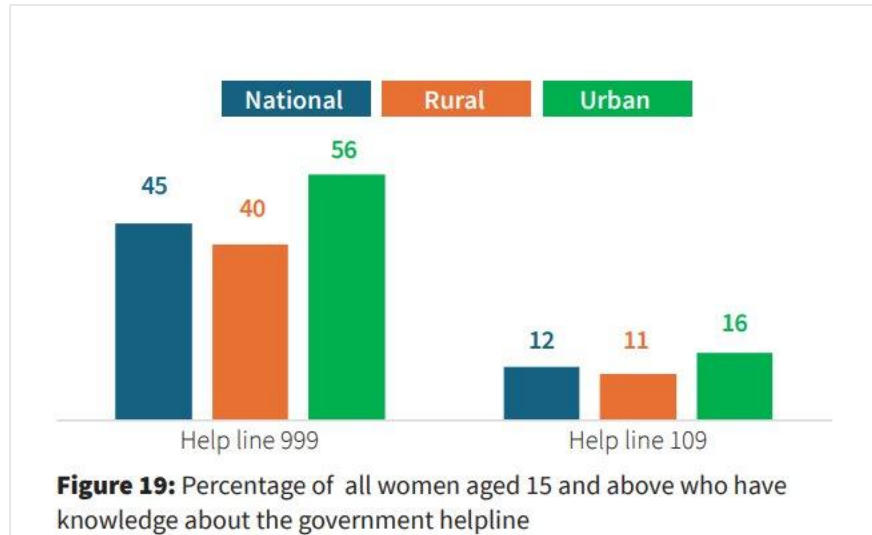
outreach materials vary significantly in both content and presentation style. A practical example of this mainstreaming effort includes integrating SEA prevention messages into cyclone preparedness materials during disaster seasons.

According to the 2024 Inter Sector Needs Assessment⁹⁵, only 59% of Rohingya households have knowledge and awareness on sexual exploitation and abuse reporting mechanisms while only 26% have received awareness sessions in 2024 (a 10% increase from 2023). This gap is consistent across gender and age groups. Most prefer to report SEA cases to Camp-in-Charge (72%), women-girl safe spaces (43%) and Mahjis (38%). While most households (96%) are confident in their ability to report misconduct, 4% of households are hesitant. Among these hesitant households, 57% (62% women and 38% men) do not know what constitutes misconduct or reportable behavior, and 29% do not know where to make a report. Although only a small portion of households (3%) agree that it is acceptable for individuals to engage in exploitative relationships with humanitarian workers for material favors, and 1.36% believe that humanitarian workers can ask for favors in exchange for assistance, this still indicates a potential vulnerability where exploitative relationships may be normalized and accepted and thus targeted campaigns addressing SEA is necessary.

Before the COVID-19 pandemic, the PSEA Network had developed a comprehensive communication strategy for the Rohingya Refugee Response. While global disruptions delayed implementation, this strategy will now be revised and expanded into two parallel tracks: a nationwide approach and a refugee-specific adaptation. Current awareness efforts primarily rely on organization-led in person awareness sessions for community groups, with surveys from 2023–2024 confirming that in-person communication remains the preferred method among the Rohingya population. “According to the findings, 71% of respondents favor face-to-face communication with aid workers, followed by 48% who prefer receiving information from volunteers, and 37% who favor door-to-door visits. This indicates that the Rohingya community values personalized interaction over generic information sharing, highlighting the need to adjust the communication strategy accordingly.”⁹⁶ Supplemental materials include video and audio content, flyers, and pictorial messages; however, standardization remains a critical need. Some visual materials currently in use, such as overcrowded flyers and posters attempting to convey all six core PSEA principles at once, are too complex for effective community understanding. Rohingya Refugee participants in our assessments expressed interest in follow-up awareness sessions on PSEA. They also requested additional information during home visits and clearer guidance on available reporting mechanisms. According to the Key Findings of the Violence Against Women (VAW) Survey in Bangladesh in 2024, there is a lack of awareness of government hotlines and free legal aid, and only half of the interviewed women knew where to get support.

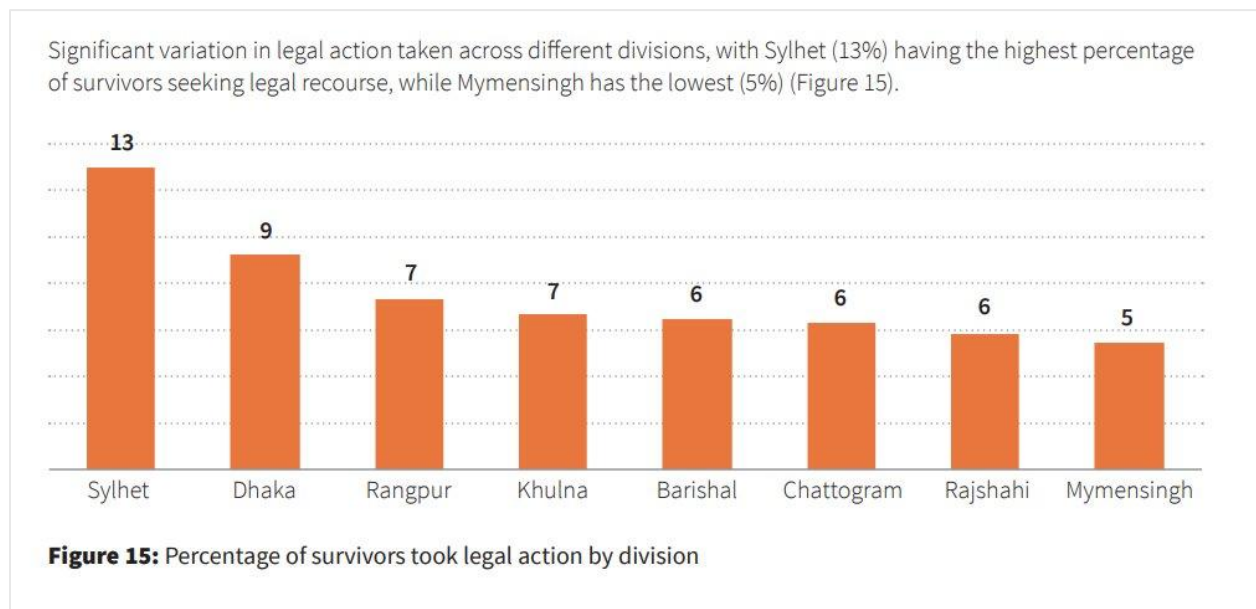
⁹⁵ ISNA (Inter Sector Needs Assessment) 2024

⁹⁶ ISNA (Inter Sector Needs Assessment) 2024



Bangladesh Bureau of Statistics (BBS) and UNFPA. Key Findings: Violence Against Women Survey 2024.

Reporting and seeking legal justice remain very low, despite the availability of free legal aid for survivors. This is largely due to a lack of awareness. Only 15% of survivors sought medical care, and 8% sought legal action. Additionally, for medical care, survivors reported paying BDT 2512 for medical care and close to BDT 4, 104 on legal support making this financially untenable to most Bangladeshis and Rohingya refugees.



Bangladesh Bureau of Statistics (BBS) and UNFPA. Key Findings: Violence Against Women Survey 2024.

Creative approaches have shown strong potential in enhancing community engagement. Past initiatives, such as the CHS Alliance's theatre performances and the Rohingya Cultural Memory Center's creative projects, highlight how culturally tailored messaging can be effectively delivered through innovative and engaging methods. Improve in messaging is urgently needed not just for the community but also government actors, heads of

office, PSEA focal points, program managers, staff, volunteers, religious and traditional leaders, focusing on the critical distinctions between GBV/SEA and what is often being labelled as "indecent acts", even the law. Currently, this terminology dangerously conflates criminal sexual violence with moral judgments, creating confusion that can have impact on the accountability, not only within the humanitarian and development sector but as well at legal level in the Country. Effective communication strategies are needed to deliberately separate discussions of violent criminal acts from moral discourse while developing culturally appropriate, child-friendly methods to teach body safety, reduce SEA risks, and understand who public servants are and how they should be treating the communities they serve.

The Rohingya Cultural Memory Centre, as an established and trusted community institution, provides an ideal platform to advance these efforts through creative collaborations with singers, songwriters, and storytellers who can craft messages to deliver concrete safety information while respecting community traditions. This model could be expanded nationwide through partnerships with public schools, mosques, and community centers to ensure consistent messaging about the critical differences between criminal sexual violence and moral/social concerns ensuring these messages can reach all Bangladeshi communities.

Further research is needed to understand how to effectively reframe messaging in the context of Bangladesh, from influencing legislation on sexual harassment to improving the ways communities report and communicate incidents.

4.3b. Reporting & Accountability to Communities

"(Police) Investigators often demand a large amount of money or extra benefits, and in the name of punishment, they repeatedly harass the victim." (Bangladeshi FGD Participant)

According to the Inter-Agency research "Gender Amongst Rohingya Refugees and Host Communities", one of the most concerning issues the report highlights is that, though complaints have been made, the complaint mechanisms available were often tokenistic where perpetrators of sexual abuse, especially from the local staff and camp authority figures, enjoy impunity due to ineffective mechanisms.⁹⁷ "Inadequate security, a sense of impunity among perpetrators, and inaccessibility to or lack of justice for survivors of SGBV in the camps all play into a rise in sexual harassment, abuse, and exploitation. This, on top of the inaccessibility of formal and informal justice systems and reliance on camp governance mechanisms, make reporting instances of both SGBV and SEAH nearly impossible for many women and girls."⁹⁸

Only 47% of senior managers shared anonymized data on SEA allegations with the senior-most UN Official (RC/HC). However, 31% did not, and the remaining (22%) did not know whether their agency did or did not report to the RC. This shows gaps in knowledge of SEA allegations and lack of available solid data, and concerns within the agency regarding procedures and guidelines to follow when reporting allegations. But this also highlights the low support and engagement to PSEA and to the network itself from senior leadership.

Communities themselves, involved in the FGDs, were not sure about what was sexual exploitation and abuse or whom to report to. Some communities were generally well informed on their rights but couldn't distinguish

⁹⁷ UNHCR, ActionAid. *An Intersectional Analysis of Gender Amongst Rohingya Refugees and Host Communities in Cox's Bazar, Bangladesh*. Inter-Agency Research Report. September 2020.

⁹⁸ *Closing the Accountability Gap: "Community Perspectives and Experiences with Sexual Exploitation, Abuse, and Harassment (SEAH) in Occupied Palestinian Territories (oPt), Bangladesh, and Ethiopia"* (2022)

SEA from GBV or used definitions interchangeably. They were informed mainly because they were participants in GBV projects or programs.

Despite their knowledge of PSEA, they didn't think reporting to the NGO was an option. Many of them said, "After reporting, confidentiality is often compromised, causing further distress." This exacerbates the cultural, religious, and societal fear of stigma and victim blaming and furthers impunity. "In most cases, negative reactions follow, including victim-blaming. Victims may suffer double harassment, with only a limited case being resolved. A more discreet and fair process would be beneficial, and focal persons must remain unbiased," recommends a frontline staff. This sentiment is echoed in the context of Cox's Bazar, where disillusionment and fear are prevalent among communities who worry that reporting concerns may lead to reprisals, such as the withdrawal of aid.

Only a newly established PSEA email serves as inter-agency Community-Based Complaint Mechanism at the national level in Bangladesh. There are two national governmental hotlines that are not coordinated or supported by the PSEA network, AAP working group, the UN, or any of the protection actors. However, this could be an opportunity for collaboration between the government and the PSEA Network for capacity building in handling cases, training, and streamlining GBV and SEA cases.

In Cox's Bazar, Community-Based Complaint Mechanism (CBCM) tools lead by individual entities, such as complaint boxes, and hotlines are available in women and child friendly safe spaces, information desks, service centers and the site management office. The CBCM mainly relies on hotlines, complaint desks, emails, and they are managed by individual organizations. Staff at safe spaces and information desks also often receive complaints directly and refer them to the appropriate agency, while ensuring that survivors receive timely support from GBV service providers. According to the AAP TWG surveys, almost all organizations reported that staff working at complaint desks were trained. Each agency is responsible for the capacity building of their staff/volunteers working on CBCM. The PSEA Network supports the capacity building of the PSEA focal point, each focal point should be leading the mainstreaming and training of staff within their agency. Standardized ways for organizations to measure the knowledge and response capacities of their organizations to SEA should be implemented, particularly with regards to the capacity of actors working at help desks for CBCM.

GBV actors provide victim support, and they are also the ones to identify if the case is an SEA case, which imply the report of allegation to involved entity for investigation, collection of PII and signed of informed consent, and referral for victim assistance. There are no SEA guidelines or separate intakes form to help this process and relies heavily on the hope that the case manager makes a note that this is an SEA case. The PSEA network is coordinating with GBV actors to create guidelines for documenting and separating filing SEA cases so better follow-up and monitoring can occur for victims of SEA. This will also better reflect the impact of PSEAH efforts on the country.

There is a concern over the multitude of hotlines, as almost every agency has its own, and how this creates confusion. The AAP (Accountability to Affected Population) Technical Working Group in Cox's Bazar is coordinating efforts to ensure a streamlined complaint system for all the complaints and feedback from the different camps. The camps are split into those led by IOM and those run by UNHCR. IOM has a centralized database system for complaints among its camps. This does not however include SEA complaints. The AAP WG efforts will help centralize all camps' complaint feedback data however it remains unclear about SEA allegations and how those would be handled.

GiHA Working Group coordinators mentioned that the community-based complaint mechanism was ineffective for several reasons. "The CBCM relies on written complaints. Communities are often not educated

enough to draft and submit a complaint." This further affirms the community preference for in-person communication. CBCM does have complaint box and email. However, it also has help desks for complaints in the camp within safe spaces, CIC or camp management office. In addition, staff also go door to door to follow up with community members. So, although written systems might be difficult, there are other touch points with the community. The challenge is to maintain confidentiality and whether these complaints are properly followed up by the staff/volunteer. According to the GiHA Working Group coordinator, complaints seldom get any follow-up from the staff or workers.

Additionally, PSEA focal point also reports that one of the most significant challenges in handling SEA allegations is responding to allegations with investigations and proper follow-up. Currently, UNs and most NGOs don't have local investigation capacity. The current model that requests entities to have investigation capacities sitting only at HQs level, having global PSEA investigators following up on allegations around the world, has created a wait time of at least 2-3 years, if not longer. This delay, also in receiving feedback on allegations, encouraged community to prefer reporting to CiCs and community leaders, who they perceive to hold power and influence in the community. Follow-up from the community leaders or police is faster than going through the UNs or INGOs. However, this also creates issues with how the community leaders handles cases as they lack a victim centered approach while dealing with SEA or other GBV cases. Examples of how they have dealt with SEA cases include: interrogating the perpetrator themselves, bringing the perpetrator and victim together for cross-examination, publicly beating or humiliating the perpetrator as a form of recourse and recommending marriage to end the dispute. From our assessment, we see a bias against victims of allegations.

In the past the APBn office has taken actions to dismiss "one staff member for sexual misconduct allegations," and as well, RRRC office has shown some commitment to PSEA principles. However, because they also feel that in the past they took action against their staff wrongfully, an emphasis is made on having the ISCG or UN actors confirm allegations to be credible before bringing them to the RRRC's office, emphasizing on high number of false allegations. It is essential for organizations and government entities to handle all allegations using a victim-centered approach and uphold a policy of zero tolerance toward SEA. This means that organizations and government entities must be equipped to receive and process allegations appropriately. However, it is important to acknowledge that the UN and ISCG are not mandated to investigate or adjudicate allegations involving government personnel, as they lack the necessary administrative and investigative authority.

The PSEA Network and focal points might use this as an opportunity to increase the government's understanding of how to handle SEA investigations and difference between criminal and administrative investigations, the importance of a victim-centered approach, provision of training for staff and support on their reporting systems define procedures when receiving allegations involving any of the UN or non-UN entities. This includes the importance of promoting reporting rather than creating barriers to reporting.




The investigation process is further complicated by the perception that local aid volunteers are among the most likely perpetrators of SEA. While these volunteers often have some form of contractual agreement, the systems in place are frequently inadequate. Agencies working with the UN as Implementing Partners are requested to have investigation mechanisms in order to receive funding. However, many of these agencies do not have sufficient capacity, either technical or financial, to abide by procedures that are guided by victim-centered principles and ultimately contribute to deepening mistrust within the community.

The greatest challenge is that there is a clear tendency to be a lot of confusion by the government, local NGOs, and implementation partners, community leaders, CiCs, etc. that investigation of SEA allegation relates to "legal investigations" versus the administrative investigation of the UN/aid agencies of SEA. This can bring to practice that are against the victim centered approach, an example are cross examination and the right of the




perpetrator to witness the victim testify, which are mandatory in legal investigation but against victim centered approach. According to BLA, “If in an enquiry, any oral evidence is given by any party, the person against whom such evidence is given may cross examine the witness.” (S.24(5), BLA 2006). Local NGOs or camp level administration misconstrue their role or subject victims to unsafe investigations that exceed the boundaries of administrative investigations.

The PSEA Network has emphasized the urgent need to map all investigators working with NGOs and Implementation Partners in Bangladesh. It also advocates for collaboration with CHS Alliance and other relevant stakeholders to strengthen investigative capacity through specialized SEAH investigation training. Such efforts would significantly enhance the quality of victim response, align messaging and procedures across local agencies, and improve overall knowledge and practices in handling SEA cases.




In addition, the PSEA Network has called for stronger legal provisions related to SEAH. Collaborative efforts with the ILO and the government are currently underway, aiming to build the capacity of local governance, legal, and public service institutions. The goal is to foster a deeper understanding of SEA and support the implementation of meaningful, actionable reforms.

<i>Dimension Four: Protective Mechanisms. SEA Risk Register</i>		
4.1a. Capacity of PSEA focal points		
 Findings	 SEA Risks	 Recommendations
<ul style="list-style-type: none"> Bangladesh’s PSEA Networks include a large number of focal points; however, many of them are double- or even triple-hatting, and most have limited prior experience in PSEA. Organizations in Bangladesh involved in the PSEA Networks face significant challenges due to high staff turnover. Many of the designated focal points lack backgrounds in protection, gender-based violence, or human resources. While such qualifications are not formally required, this lack of expertise complicates capacity-building efforts. Moreover, there is inadequate budgetary support 	<ul style="list-style-type: none"> PSEA focal points play a critical role in strengthening an organization’s capacity to prevent and respond to sexual exploitation and abuse (SEA) using a victim-centered approach. The risk of SEA increases significantly when an organization lacks a well-trained focal point. In such cases, the PSEA Network also faces difficulties in implementing key activities, including the development and dissemination of communication strategies, conducting awareness sessions, and delivering training programs. 	<p>Senior Leadership</p> <ul style="list-style-type: none"> Senior management to look into the background and capacity of PSEA focal points being nominated to ensure capacity to serve in the role Increased budgets towards capacity building, retention, and support for PSEA focal points. <p>PSEA Network</p> <ul style="list-style-type: none"> Develop and conduct standardized trainings regularly each quarter by the Network for focal points to create a sustainable way to ensure capacity of focal points, even with high turn around. Alternatively, ToT is a way to ensure the PSEA focal points orient their new






to effectively equip focal points to carry out their responsibilities.		focal point in handover processes. The ToT would be most effective as a scenario-based training.
4.2a. Reporting		
 Findings	 SEA Risks	 Recommendations
<ul style="list-style-type: none"> • There is a lot of qualitative knowledge but limited numbers on the extent of the issue. One point of data missing that should exist comes from limited participation in anonymized data being shared to the RC's office. There is also a lack of documentation of "unsubstantiated claims" or allegations that haven't finished being investigated however this is a global issue with UN Check and MDS. • Reporting is limited by there not having harmonized hotline system or communications materials on reporting. The CBCM using numerous methods including in-person opportunities which resonate for the population such as house-to-house visits, safe spaces, help desks, camp management desks. Staff is trained to handle complaints by the organization they work for. 	<ul style="list-style-type: none"> • Programme participants /staff does not know where to report, how to report supports a culture of silence and increase SEA incidents • Police have been noted as violators of the community and having unsafe reporting channels can increase impunity, and violence by the police and other actors. • The police force often does not take online harassment seriously and lacks the necessary training and capacity to handle such cases effectively. 	<p>PSEA Network</p> <ul style="list-style-type: none"> • Introduce dedicated PSEA reporting hotline number • Explore available channel for awareness and information dissemination on reporting • Strengthen community-based complaint mechanism, reporting channel by ensuring that teams working at the in-person locations are well-trained and know how to handle SEA cases. • Implementing harmonized data systems for managing complaints, including those related to sexual exploitation and abuse (SEA), across UNHCR and IOM-managed camps in the Rohingya response would significantly improve data collection, enable more effective follow-up, and strengthen overall accountability mechanisms. <p>Government and PSEA Network</p> <ul style="list-style-type: none"> • Trainings on improved code of conduct policies that explicitly prevent sexual exploitation and abuse are



<ul style="list-style-type: none"> Reporting to the police or getting legal justice is difficult and slow as they want to show crime rights are not in the rise or high in their districts and often do not handle cases properly. 		<p>necessary for all public servants (CiCs, Police, Community Leaders, etc.)</p> <ul style="list-style-type: none"> Referral pathway needs to create safer channels for legal recourse through the Police forces for better, safer, confidential reporting channels such as private female officer reporting room or trained hotlines operators. And handbooks for addressing SEAH including online abuse. Greater awareness raising is needed on provisions that exist, such as free legal aid for survivors. The community needs more access to information on reporting, hotlines, legal aid, and safer private reporting locations.
4.3a. Community Awareness		
 Findings	 SEA Risks	 Recommendations
<ul style="list-style-type: none"> Communities often lack awareness of Sexual Exploitation and Abuse (SEA) and struggle to distinguish it from Gender-Based Violence (GBV). Additionally, many are unable to identify aid workers and are not adequately informed about how or where to report SEA incidents. 	<ul style="list-style-type: none"> Being informed on SEA, prevents SEA. By not knowing their rights and in general understand that they do not have to submit to bribery, extortion, or paying for their aid, reduces the risk of exploitation and SEAH. Knowing who is an aid worker thus also empowers communities on their rights and helps them better report. Also aid workers in their labels, reduces their risky behaviour with their liability and pressure the organization can put on them. 	<p>Organizations</p> <ul style="list-style-type: none"> All aid workers, volunteers, and contractors should maintain high visibility while on duty. This includes wearing clearly identifiable items such as ID cards, vests, or other visible markers that indicate their affiliation with the aid agency. Ensuring visibility is essential for accountability and for building trust with the communities they serve.



		PSEA Network <ul style="list-style-type: none"> Update <i>communications strategy</i> that can both reach communities still desiring in-person information and a younger (highly vulnerable) population on safety from SEAH.
4.3b. Accountability and Victim Assistance		
 Findings	 SEA Risks	 Recommendations
<ul style="list-style-type: none"> A lack of accountability often arises from challenges in enforcing a zero-tolerance policy toward SEAH. Organizational cultures in many cases continue to disadvantage those who report SEAH incidents. Volunteers, contractors, and implementing partners (IPs) are particularly difficult to manage within the scope of PSEA efforts, further complicating prevention and response mechanisms 	<ul style="list-style-type: none"> Ignorance to misconduct create distrust among the staff/personnel. Organization may lose potential human resources 	Heads of Organizations <ul style="list-style-type: none"> Zero tolerance policies, code of conduct, guidelines need to be included in the induction package. Organization Heads need to make all the unit heads accountable to provide necessary training/refreshers to team members. Strong culture-zero tolerance- within organization to roll out policies and take actions against any sexual misconduct
<ul style="list-style-type: none"> Investigations into SEA cases are often inadequately followed up by UN, largely due to the reliance on HQ level investigation mechanisms. This can lead to a perception that aid agencies are not effectively addressing the issue, resulting in a shift toward local government actors who may not employ a victim-centered approach. 	<ul style="list-style-type: none"> Victim/survivor that do not get services as required can lead to severe health issues including mental health concerns sense of distrust for the whole service system from appropriate care and handling of SEAH cases, can result in underreporting, feeling of 	GBV/Protection Cluster/Sector <ul style="list-style-type: none"> Update service mapping on regular basis Referral services (Government services, NGO Services) should be inclusive (GDP, Person with disabilities etc.)



<p>Although local NGOs are required to establish investigation teams to qualify for UN funding, there remains a lack of locally based teams with the necessary training and expertise to conduct thorough and sensitive investigations. The investigative process is often lengthy and complex, further hindering timely and effective responses</p>	<p>alienation, and increase in SEAH</p> <ul style="list-style-type: none">• The requirement set by the United Nations for NGOs and implementing partners (IPs) to establish investigative systems is often treated as a compliance checkbox. While intended to strengthen PSEA efforts, this approach can pose serious risks when untrained personnel are assigned investigative roles. Without proper training and a victim-centered approach, these investigations may inadvertently cause further harm to survivors and undermine the credibility of safeguarding mechanisms	<p>Government and PSEA Network</p> <ul style="list-style-type: none">• Stakeholders, including service providers and government actors such as Camp-in-Charge (CiC) officials, should receive orientation and training on the survivor-centered approach to ensure that responses to SEA are sensitive, respectful, and aligned with international safeguarding standards.• Provide orientation on the IASC GBV Referral Guidelines across both humanitarian and development contexts, in collaboration with the GBV Sub-Cluster or relevant sectoral coordination bodies. <p>PSEA Network</p> <ul style="list-style-type: none">• Create a mandatory training methodology on PSEA investigations for all local NGOs investigators with regular monitoring and evaluations systems.
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Bangladesh has demonstrated progress in PSEA coordination, particularly at Cox's Bazar level, with strengthened networks, awareness campaigns, and senior leadership engagement. However, critical gaps persist—including under-resourced Dhaka-level coordination, weak accountability mechanisms, and systemic barriers like protracted investigative processes, victim-blaming, and conflation of SEA with moral rather than criminal frameworks. Community trust remains low due to inconsistent reporting pathways and cultural stigma, while funding shortfalls and capacity gaps among focal points further hinder progress. To sustainably address SEA, Bangladesh must prioritize victim-centered reforms, standardized training, harmonized reporting systems, and legal advocacy to close the divide between policy and practice. Without urgent action, systemic impunity and protection risks will persist, undermining humanitarian efforts.

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