



Standard Operating Procedures for Sexual Exploitation and Abuse (SEA) Complaint Referral in Bangladesh

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A. Introduction

These Standard Operating Procedures (SOP) cover actions to be taken in case alleged incidents of Sexual Exploitation and Abuse (SEA) committed by humanitarian or development workers partners, development or affiliated personnel, including Rohingya refugee in Bangladesh are reported, in humanitarian or development setting.

This SOP relies on UN “Zero Tolerance Policy for Sexual Exploitation and Abuse”¹ and the procedures explained below have been built upon those principles. The SOP aims to guide members of the PSEAH Network in Bangladesh to:

- handle SEA allegations received through established reporting channels;
- ensure the allegations are referred to the concerned entity for investigations and follow up;
- ensure appropriate protection, support, confidentiality, due diligence, services and information are provided to the victim in accordance with the Victim-Centered Protocol² and Do No Harm principle.

The PSEAH Network in Bangladesh is prioritizing the:

- a) prevention of SEA incidents;
- b) promoting and ensuring safe and accessible reporting mechanisms;
- c) providing prompt and quality assistance to all SEA survivors;
- d) ensuring all allegations of SEA are handled in a safe, confidential and efficient manner; and
- e) sharing of information on SEA allegations with the UNRC as per OSCSEA guidance note³.

This SOPs *for SEA Complaint Referral in Bangladesh* additionally provide guidance on:

- Step 1: Lodging and initial intake of a complaint.
- Step 2: Referral of victim for immediate assistance.
- Step 3: Referral of complaints for investigation.
- Step 4: Follow up with the Victim/Complainant

This SOP does not change or override internal policies and procedures of UN and non-UN entities on PSEA that comply with global PSEA standards. Rather, the SOP complements and contextualizes those policies and procedures by outlining the referral process for SEA allegations in Bangladesh.

Sexual harassment between the staff or affiliated personnel and GBV cases are not included in the scope of this SOP.

¹ ST/SGB/2003/13, also known as the Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Sexual Abuse

² [UN Protocol on the Provision of Assistance to Victims of Sexual Exploitation and Abuse](#)

³ [Updated Guidance Note - Information Sharing on SEA Allegations](#)

B. Complaint Referral Procedures

Phase 1: Lodging a complaint

1.1 Receiving a complaint

Complaints can be made by a victim, a complainant, a witness or a whistle blower using any of the already established channels or mechanisms that include but are not limited to:

- **In-person reporting** to an aid worker verbally or in writing.
- Specific locations such as women-and-girls' safe spaces, child-friendly spaces, person with disabilities friendly spaces, gender diverse population friendly spaces, multipurpose centers where women/child/adolescent-friendly complaint mechanisms are in place.
- **Information hubs and feedback and information centers** where information and referral on available assistance and services are provided and community feedback, grievances and complaints are received, their confidentiality ensured and addressed with a response.
- **Complaint and feedback boxes**
- **Toll-free hotlines** allowing a complainant to make direct contact with trained staff over the phone; and
- **Dedicated e-mails** allowing a complainant to report through designated organizational email addresses.
- **Community leaders** and any other community members identified and trusted by the beneficiaries, including Camp in charges (CiCs) and CiC Staff, Majhis and APBn⁴
- **Any other reporting channel** of the organization and/or partner/donor

1.2 Reporting Forms

Whenever the first recipient of the complaint receives a potential SEA allegation, the first recipient receiving the allegation will complete the GBV Intake form⁵ following the guidelines as per [Annex 4](#). The intake form will have a section on the informed consent which will clarify the mandatory reporting requirements, the sharing of Personal Identifiable Information (PII) and the follow-up.

The complainant can decide to report PII for themselves and/or for those involved in the incident, to make the report anonymous.

In the same way, it is the complainant's decision to share PII of the victim and of the perpetrator. In case the complainant is not willing or able to share PII, the complaints will be referred for investigation without PII, as per mandatory reporting.

The hard copy of the intake form will be saved in a secure location, with a lock, managed by the PSEAH focal point. The soft version of the Intake form will be saved and encrypted with a password. More information on the security management of this information is available in the attached Information Sharing Protocol (ISP), [Annex 3](#).

⁴ Specific agreement has to be defined with communities' representatives to ensure they are aware on how to properly refer SEA allegations.

⁵ [GBV Intake form](#)

Phase 2. Referrals for immediate assistance

The aim of the referral is to ensure that victims and those affected by the allegation are supported and promptly referred to receiving immediate assistance. Aid and assistance must be immediate and align with GBV Guiding Principles⁶, and it should not be dependent on the outcome of an investigation, or whether the survivor collaborates with the investigation. Whenever possible, the services should be provided following the existing GBV referral pathways. If victims do not want to access services, their wishes must be respected. Victims can still be provided with information in relation to GBV service providers in their area in case they wish to access services in the future. See further guidance below:

Step 1

While talking to the victim/complainant, explain the service available in the specific location. However, the services in the location should be verified and assessed regularly through the service mapping exercise and referral pathways update led by the GBV cluster/sub-sector. All services must be provided following victim's consent.

The services provided to a victim can be:

- **GBV Case management:** Case management process involves a social worker or a case worker supporting survivors to assess their multi-sector needs (health, mental health, psychological, legal, safety and security, livelihoods, etc.) and accompanying them to other services through referral with the consent of survivors.
- **Medical/health care services:** The victim can be referred to healthcare services including services related to Clinical Management of Rape (CMR) or One Stop Crisis Centers⁷ as soon as possible – within 72 hours after an incident of sexual violence, to ensure necessary treatment to the victim.
- **Psychosocial Support:** Services or support to the victims to address emotional and psychological needs including crisis care, long term emotional and practical support, information and healing education. This can be done to help overcome stress, trauma and depression, provided by trained personnel.
- **Legal Assistance:** The victim may be referred to or supported with legal assistance that can help them know their rights, claim their legal rights and make informed decisions in seeking access to justice.
- **Safe Shelter:** The victim can be referred/accompanied to a safe house or shelter that provides immediate security, temporary refuge, and support to victims and their families in imminent danger who are escaping violent, retaliation or abusive situations or are at risk of further violence.
- **Safe Spaces:** The victim may be referred to a women and girls' safe space or gender diverse populations' safe spaces where they feel physically and emotionally safe and comfortable without the fear of judgment or harm.
- **Security/Police:** The victim can be referred to the safety and security services provided by government police and security services.
- **Livelihood/Economic Empowerment Support:** The victim can be referred to or supported with skills development and capacity building or provision of resources to enable survivors and vulnerable persons to gain knowledge and skills to seek employment or begin an activity that will provide them with income and empower them.
- **Emergency Basic Need Support:** includes provision of any nonfood items (NFIs) or cash for basic needs, including provisions of hygiene kits, cooking materials, supplies for shelter, protection items such as solar lanterns, dignity and well-being items clothing, menstrual items, baby items etc.

When the victim is under the age of 18, the first recipient will contact the relevant GBV Focal Point for immediate referral for specialized services.⁸ The GBV case worker will follow the existing referral

⁶ [GBV Guiding Principles](#)

⁷ [Multi-Sectoral Programme on Violence Against Women](#)

⁸ [Caring for child survivors of sexual abuse guidelines.](#)

pathways and inform the Child Protection Focal Point in accordance with the GBV and CP Case Management Guidelines⁹.

Step 2

Decision on the type of support needed lies with the victim (or their guardian in case of children) and their willingness to access the services. The services provision must be timely, confidential, and guided by survivor choice and informed consent, in line with protection standards and the survivor-centered approach.

Step 3

After obtaining the victim's consent, information on the allegation and the victim's needs will be shared with the GBV case manager or with the service provider.

The service provider receiving the victim is responsible for contacting the referring personnel within 48 hours and notifying him/her of the services accessed/received by the victim.¹⁰

Phase 3. Referral of complaints for investigations

Before making a formal referral for investigation, it is mandatory to ensure that the consent information section (as per [Annex 4](#)) in the INTAKE Form is signed by the complainant.

In case the victim does not consent to share the PII, the allegation will still be reported but no identifiable information in relation to the victim will be disclosed.

The investigation, follow-up and potential disciplinary measures are solely the responsibility of the concerned organization based on their internal procedures and policies.¹¹ **Other Members of the PSEA Network will not be involved in any of those processes.**

Step 1

After referring the victim for assistance, the first recipient refers the Intake form as below:

1. If the alleged perpetrator is from own organization, the allegation will be shared with the organization's PSEA Focal Point in accordance with their internal reporting channels (ideally within 24 hours from the report of the allegation);
2. If the alleged perpetrator is from a different organization, the allegation will be shared with the PSEA Network coordinator (within 24 hours from the report of the allegation). The PSEA Network coordinator will refer the allegation with the concerned organization;
3. If the organization of the alleged perpetrator is unknown, the allegation will be shared with the PSEA Network coordinator (within 24 hours from the report of the allegation). The PSEA Network coordinator will take necessary steps to ensure investigations are conducted, with support of external investigators and HQs support whenever needed;
4. If the alleged perpetrator is a government actor, the allegation will be shared with the PSEA Network coordinator (within 24 hours from the report of the allegation). The PSEA Network Coordinator will inform the UNRC who will inform the relevant Government counterpart (within 48 hours from receiving the report).
5. If the first recipient believes the reporting channel is compromised, or is concerned about retaliation, or the PSEA Focal Point and the backup are unavailable, the allegation will be shared with the PSEA Network Coordinator (within 24 hours from the report of the allegation).

⁹ [Gender Based Violence \(GBV\) and Child Protection \(CP\) Case Management Guidelines](#)

¹⁰ [Guidance Note on Inter-Agency Sexual Exploitation and Abuse Referral Procedures \(IA SEARP\)](#), September 2023.

¹¹ For more information on referral for investigation and possible administrative action, refer to p.29-32 [IASC Global Standard Operating Procedures on Inter-Agency Cooperation in Community-Based Complaint Mechanisms, 2016](#).

It is not the aid workers' responsibility to determine the credibility of a complaint or whether there is sufficient information for investigation. It is also not the responsibility of the aid worker to investigate any allegations. Complaints must be treated as strictly confidential and will only be shared following the referral mechanisms established in this SOP.

Step 2

After receiving the allegation, the PSEA Focal Point of the organization will:

1. Ensure the victim receives the necessary assistance and assess the need for more assistance (within 24 hours from the report of the allegation).
2. Share the allegation for investigation as per the internal procedures (within 24 hours from the report of the allegation).
3. Share the allegation with the UN Resident Coordinator as per the Guidelines as per [Annex 2](#) (within 24 hours from the report of the allegation).

In case an organization lacks the capacity to investigate a SEA complaint internally, and/or does not have a partnership agreement with a UN agency that can support an investigation, the PSEA Network Coordinator will assist the organization in identifying appropriate resources to undertake the investigation from within the PSEA Network or from other accredited resources in the country or from within the region.

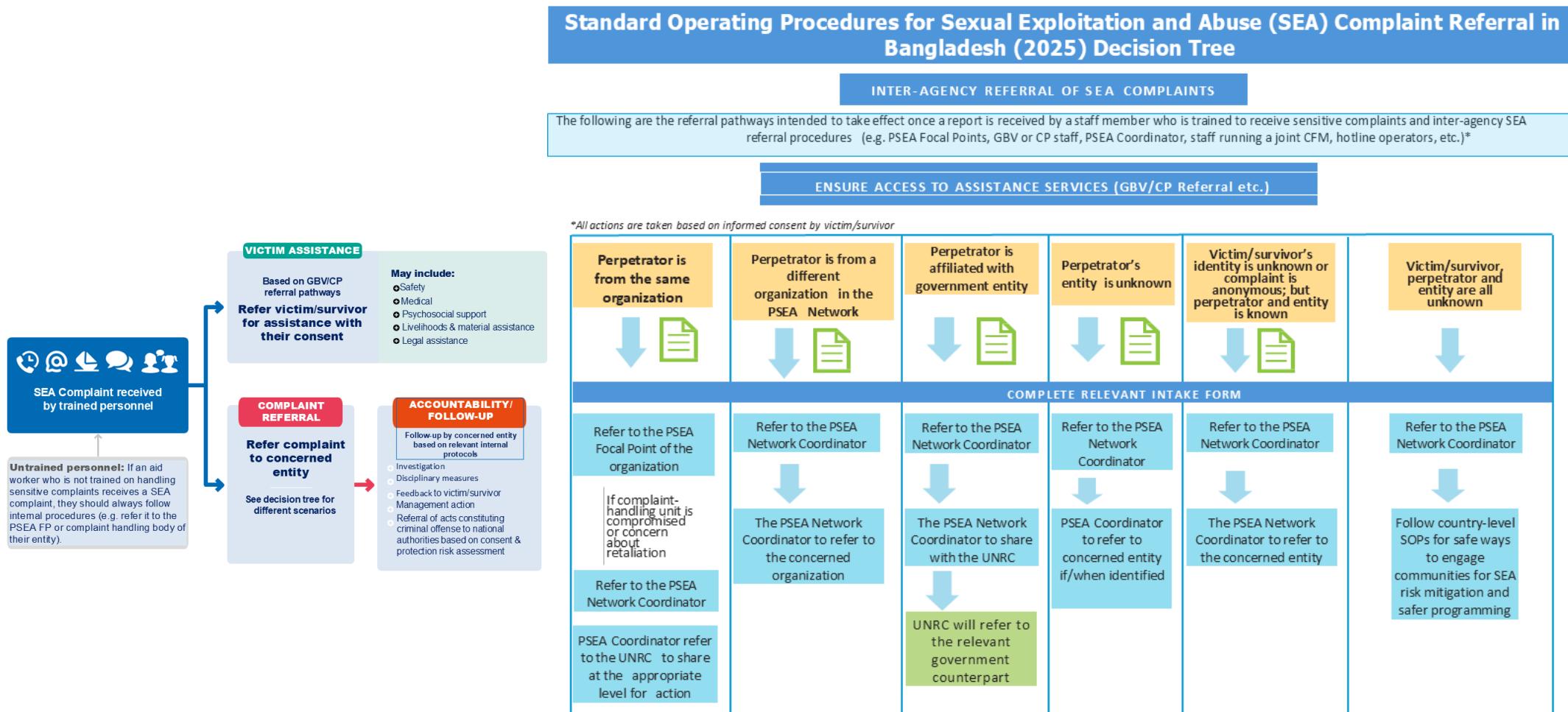
Step 3

Follow up with the Victim /Complainant

After 90 days from the initial report, the PSEA Focal Point of the relevant organization, or whoever responsible, based on the organization's internal procedures must:

1. Provide an update to the complainant or to the preferred person identified by the victim on the status of the investigation. Such information must be shared with the complainant only if he/she requests an update.
2. Provide an update to the UNRC and/ or PSEA Network Coordinator on the status of the investigation and support provided to the victim.
3. In case the investigation has not been finalized after 90 days, the relevant organization's PSEA Focal Point will provide update to the UNRC and/or PSEA Network Coordinator on the status of the investigation every 3 months, until the investigation is completed.

Standard Operating Procedures for Sexual Exploitation and Abuse (SEA) Complaint Referral in Bangladesh (2025) Decision Tree



Annex 1. Definitions

Complainant¹²: A person who brings forward an allegation of SEA. This person may be a SEA survivor or another person who is aware of the wrongdoing. The complainant should be protected from retaliation for reporting SEA.

Concerned Organization: The organization that employs the alleged perpetrator. It may be a UN agency, I/NGO, implementing partner, or any organization involved in the provision of humanitarian aid. This is the organization responsible for investigating allegations of sexual exploitation and abuse (SEA) and taking appropriate follow-up action.

Confidentiality: Confidentiality is a fundamental principle at the very core of victim assistance. Confidentiality is a responsibility to protect the information that someone else has shared and their choices about disclosure.

Do No Harm Principle: ‘Do no harm’ principle is taking all measures necessary to avoid exposing victims to further harm as a result of actions, when providing assistance. This means protecting victims from further harassment, intimidation, retaliation, trauma, or victimization.

Aid workers: All personnel involved in providing protection and/or assistance to those in need who have a contractual relationship with the participating organization, including incentive workers from target communities. It refers to all staff of humanitarian organizations, including UN agencies, INGOs, NGOs, implementing partners including paid staff, volunteers, contractors, incentive workers and anyone performing a task on behalf of any humanitarian organization, regardless of the type or duration of their contract.

Implementing Partners¹³: Entities or organizations that operate at country level to provide services and deliver humanitarian assistance. Staff of, and all those employed by, an implementing partner are “aid workers” for the purposes of this SOP.

Informed Assent: Informed assent is the expressed willingness to participate in services. For younger children, who are, by definition, too young to give informed consent but are old enough to understand and agree to participate in services, the child’s “informed assent” is sought.

Informed consent: Informed consent means making an informed choice freely and voluntarily by persons in an equal power relationship, including full knowledge of all information available to make the consent informed. The victim must be informed about all available options and fully understand what she or he is consenting to as well as the risks, including the limits of confidentiality, and benefits before agreeing. The full range of choices should be presented to the victim, regardless of the service provider’s individual beliefs. The victim should not be pressured to consent to any service, interview, exam, assessment, etc. A victim can withdraw consent at any time.

Mandatory Reporting¹⁴: In recognition of the UN’s zero-tolerance policy for SEA, the Secretary General’s Bulletin on SEA and related organizational policies oblige staff and partners to promptly report all concerns or suspicions of SEA by fellow workers via established reporting mechanisms, whether or not the alleged perpetrator is from the same organization.

¹² [Global Standard Operating Procedures](#), inter-agency cooperation in community-based complaint mechanisms, Key Definitions, IASC, 2016.

¹³ [Global Standard Operating Procedures](#), IASC, 2016.

¹⁴ Secretary-General’s Bulletin on SEA, mandatory reporting as per standard (e) of Secretary-General Bulletin, [ST/SGB/2003/13](#).

Sexual Exploitation and Abuse¹⁵: Sexual Exploitation and Abuse (SEA) is a form of GBV that constitutes an abuse of power by aid workers against the affected population.

Sexual Exploitation: Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another.

Sexual Abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual Harassment¹⁶: Any unwanted sexual advance, request for sexual favor, verbal or physical conduct of a sexual nature, gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct is made by a colleague and interferes with work, is made a condition of employment, or creates an intimidating, hostile or offensive work environment.

Alleged Perpetrator: an individual whom a victim alleges committed an act of sexual violence against the victim

Victim¹⁷: A person who has SEA perpetrated against him/her or an attempt to perpetrate SEA against him/her. For the purposes of this SOP, a complainant who reports SEA committed against him/herself is treated as a survivor for the purposes of security and needs assessments.

Survivor-Centered Approach¹⁸: Humanitarian organizations have committed to actively prevent and respond to SEA and to ensure that all responses are developed in a manner that balance respect for due process with a survivor-centered approach in which the survivor's wishes, safety and well-being remain a priority in all matters and procedures. All actions taken should be guided by respect for choices, wishes, rights, and dignity of the survivor.

Whistle-blower: In general, any UN staff or related personnel who reports sexual exploitation or abuse. In the context of the policy for protection against retaliation, in defined circumstances, a staff member, intern or United Nations volunteer who reports misconduct, including sexual exploitation or abuse, may be entitled to protection under the terms of the Secretary-General's Bulletin S/SGB/2005/21.

First recipient: The first person interacting with the complainant, providing information on the assistance and filling out the INTAKE form.

Complaint: An objection to something that is unfair, unacceptable, or otherwise not up to normal standards.

Allegation: a statement, made without giving proof, that someone has done something wrong or illegal

¹⁵ Secretary-General's Bulletin on SEA, Section 1, Definitions, [ST/SGB/2003/13](#).

¹⁶ Sexual Harassment is covered by UN Secretariat Administrative Instruction Procedures for dealing with sexual harassment [ST/AI/379](#) (29 October 1992); Secretary-General's Bulletin, Prohibition of discrimination, harassment, including sexual harassment, and abuse of authority [ST/SGB/2008/5](#) (11 February 2008).

¹⁷ [Global Standard Operating Procedures](#), IASC, 2016.

¹⁸ [Global Standard Operating Procedures](#), IASC, 2016.

Annex 2. **Incident Reporting on SEA with the UNRC**

After receiving an allegation, an email must be shared with the UNRC for informational and statistical purposes. It contains information on SEA allegations that may involve UN and non-UN staff and related personnel. This must be done by the Organization PSEA Focal point within 24 hours from receiving the allegation, including the below details, if known¹⁹:

- Date and locations of the incident,
- Gender, age and number of victims
- Gender age and work category of the perpetrator
- Nature of allegation
- Actions taken, including referring to investigations and assistance provided to the victim.

¹⁹ [Updated Guidance Note - Information Sharing on SEA Allegations](#)

Annex 3. PSEA Network SEA Information Sharing Protocol

Information Sharing Protocol¹ on Sexual Exploitation and Abuse

Bangladesh PSEA Network 2025

1. Purpose

Adherence to the SOP rests with the Heads of each Networks' member entity.

The Information Sharing Protocol (ISP) does not impose any new requirements but reinforces and clarifies the provisions of the SOPs for reporting and referring SEA allegations and sharing related information by receiving entities with the Network Coordinators, Resident Coordinator's Office (RCO) and any other relevant stakeholders 'on a need-to-know basis's principle. The ISP is meant to facilitate good practices in sharing essential information throughout the reporting, referral and response process. The aim is to ensure good collaboration and collective responsibility with regards to handling, referral, feedback and timely reporting of sexual exploitation and abuse. In addition, the ISP spells out the minimum standards that must be adhered to by all UNCT members, Networks' members, Co-Chairs and RCO personnel handling and using PSEA information received.

The ISP is a Bangladesh (including the Rohingya Response) specific complementary document to the SOP and system-wide guidelines that apply. The ISP will be updated to reflect any future changes in the SOP, system-wide guidance or contextual realities.

2. Receiving, reporting and referring SEA allegations

Allegations must be reported using the INTAKE form with the addition of the "GBV Guidelines when receiving an SEA allegation" ([Annex 4](#) to this SOP)

SEA allegations are likely to be received through a variety of channels, including through Community Based Complaints Mechanisms (CBCMs), PSEA focal points (at field and national level), via the PSEA Network email or hotline numbers. Allegations may also be received by different bodies (such as clusters/sectors, police, local authorities, RRRC office, women and child friendly spaces, etc.) and referred to a PSEA Focal Point.

PSEA Focal Points and CBCMs are required to report all SEA complaints to the UN Resident Coordinator as soon as possible and within 48 hours of receiving the complaint, as per OSCSEA guidance. The information shared should follow [Annex 2](#) of this SOP.

After sharing the initial report, entities will be responsible to update the UNRC on the allegation, including the status of the investigation, the outcome of the investigation, action taken, support and services provided to the victim.

The Case Log with all the information received will be consolidated by the PSEA Coordinator and will serve as a tool to ensure the follow-up of each case within the 90-day deadline as per the SOP.

a) Entities' internal allegations

Every PSEA Focal Point must report to the UNRC any internal allegation received to ensure the UNRC accountability on the 90-days follow-up as per the SOP. This information is confidential and does not include Personal Identifiable Information (PII) or otherwise sensitive information and will be used to

ensure follow-up as well as for statistical and trend analysis and for regular PSEA Networks' reporting. Such analysis or reporting will not contain information that could cause any further harm to parties involved.

b) Inter-entity allegations

All entities must convey all relevant information received about allegations involving other entities to the Networks' Coordinators, who will in turn refer to the entities that are subject to these allegations without delay. The Networks Coordinators are responsible for referring specific cases to the entity with an email to the Head of the entity (ex. Representative, Executive Director) with a copy to the designated PSEA Focal Point in the concerned entity.

c) Allegations with unclear or insufficient information

All PSEA Networks' entities must convey all relevant information, including PII, to the Networks' Coordinators about any allegations where it is not certain or where it is unknown, which entity may be responsible for the alleged violation.

3. Victim assistance

Assistance is provided to victims on the basis of the victim-centered approach, with the victim's consent, as soon as information about an individual being a victim of sexual exploitation or abuse is received in any way or form irrespective of the credibility of the allegation or final outcome of the investigation. The PSEA Focal Point receiving the allegation and the PSEA Focal Point of the involved entity, if different, ensures the victim's referral to the appropriate service provider.

The involved PSEA Networks' entity has the responsibility to undertake all measures possible to provide assistance to the victim. In cases where the referral pathway is weak and services are not readily available, the recipient of the allegation will contact and share relevant information, including PII when required, with the Network Coordinator who will support the provision of assistance to the victim.

4. Data security and access

The UNRC through the Networks' Coordinators and the Networks' members, will ensure that all data are safe and secure and will implement appropriate procedures to maintain confidentiality of the data.

When required according to the SOP and this ISP, entities will submit the allegation forms to the PSEA Networks email²⁰ where the document will be protected by a password, which will be shared in a separate email with the Networks' Coordinators. The PSEA Coordinators will create a specific case number for every SEA allegation received that will be used as reference for subsequent communication to share relevant information for referral.

²⁰ pseabangladesh@un.org

Annex 4. GBV Guidelines when receiving an SEA allegations

This guideline is meant to be used by any actor who is recording an SEA allegation utilizing GBV reporting form. While recognizing there is no need to develop a separate reporting form for SEA allegations, the following specific steps should be taken accordingly.

- The person receiving the allegations needs to clearly clarify the meaning of informed consent as follows:
Consent is based upon the victim's clear appreciation and understanding of the facts, implications and potential consequences of an action. Actively seek consent from victims on the possible use of the information they provide. Endeavor to make no information disclosure at any time to any party without the informed consent of the victim. Inform victims about their right to engage or not to engage in a process and the fact that the Organization may decide to pursue management action, without their consent and participation, to prevent further harm, this include referring for investigation even when the victim decide not to share PII. A victim can withdraw their consent to participate in the process at any time, without impacting their right to assistance.
- Within the section to describe the allegation, all information related to the perpetrator must be recorded, including all PII and other relevant information.
- While following established procedures to refer the victims to different services, the report must be shared also with the Organization PSEA Focal point to refer to investigations and all other relevant steps already highlighted in this SOP.

Approved/endorsed by UNCT on 16th November 2025