

# Protection from Sexual Exploitation, Abuse, and Harassment (PSEAH)

## Briefing Note for Country Coordinating Mechanisms

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This Briefing Note has been designed to accompany and support members of Country Coordinating Mechanisms (CCM)<sup>1</sup> in the event that they need to navigate allegations of sexual exploitation, abuse, or harassment (SEAH), in violation of [the Code of Ethical Conduct for Country Coordinating Mechanism Members](#) (CCM Code of Conduct). The CCM Code of Conduct establishes that CCM members share accountability for prohibiting, preventing and responding to harassment and abuse of power, SEAH, as well as sexual activity with children,<sup>2</sup> in the context of Global Fund-supported programs. In addition, CCM members are prohibited from engaging in SEAH, including child sexual abuse, and required to abstain from all forms of bullying, harassment, discrimination, and other abuses of their power.

In the context of their roles, CCM members may encounter a variety of disclosure scenarios, including allegations of SEAH or related abuse of power involving CCM members or recipients of Global Fund grant funds. For guidance on referral and notice accountabilities when responding to SEAH allegations, please refer to [The Global Fund's Operational Framework on the Protection from Sexual Exploitation and Abuse, Sexual Harassment, and Related Abuse of Power](#).<sup>3</sup>

CCMs are required to immediately report all allegations of SEAH to the Global Fund Secretariat or the Office of the Inspector General (OIG). Reporting can be done through different channels, as indicated below.<sup>4</sup>

In the event that a victim/survivor approaches you directly to disclose an SEAH allegation, below are some recommendations to assist and support you in handling the situation. All

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<sup>1</sup> References to CCM include any Regional Coordinating Mechanism, RO or other non-CCM entities.

<sup>2</sup> Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally.

<sup>3</sup> See section IV.1 (Reports & Complaints).

<sup>4</sup> If a victim/survivor directly approaches you, please involve your CCM Ethics Function and the Global Fund Victim/Survivor Advocate and In-country Support Coordinator to facilitate access to support and assistance as may be available. The CCM Code of Conduct requires CCM members to support anyone who raises concerns about violations of the CCM Code of Conduct or the CCM Policy.

interactions with victim/survivors should be guided by a victim/survivor centered approach, maintaining their dignity, safety, experiences, rights, needs, and wants at the center.

## Promote a safe and trusting environment

DO	DO NOT
Create an environment of trust for anyone to feel safe to speak up.	Make promises you are not able to keep.
Listen and show empathy, whether or not you believe the allegation is true.	Be dismissive, defensive, judgmental, argue or blame the victim/survivor.
Inform the victim/survivor that all allegations of sexual exploitation, abuse, and harassment are treated seriously, and that all reports will be handled confidentially and fairly.	Ignore the disclosure. Downplay the significance of the victim/survivor's disclosure.
Emphasize that the data of the victim/survivor will be protected, and measures will be put in place to mitigate the risk of further harm.	Disclose any information or data to individuals or entities outside the established and trusted reporting mechanisms within the Global Fund.

## 1.2 Collect information

DO	DO NOT
<p>Ask:</p> <ul style="list-style-type: none"> <li>• <b>Who</b> (who is reporting, who the victim is, who the subject of the complaint<sup>5</sup> is, who else they told)</li> <li>• <b>When</b> (it happened)</li> <li>• <b>Where</b> (it happened and what context)</li> <li>• <b>What</b> (happened, generally)</li> </ul> <p>Always act on a “need to know” basis, meaning: You do not need to know all the details, nor should you ask or require that you be given those details. You only need the high-level facts.</p> <p>Remember that it is normal for a person who has experienced a traumatic event not to remember all the details.</p> <p>Assess and address any immediate safety needs of the victim/survivor.</p>	<p>Ask:</p> <ul style="list-style-type: none"> <li>• <b>Why</b> (it happened)</li> <li>• <b>What did you do</b> (to encourage, to give in, to defend yourself, etc.)</li> </ul> <p>These kinds of questions imply that the victim/survivor was somehow responsible for what happened to them, and these questions should be avoided.</p> <p>Try to investigate or ask for too many details – just take notes about what is being reported.</p> <p>Make comments or assumptions without knowing the facts.</p>

<sup>5</sup> The Subject of Complaint is the person who is alleged to have perpetrated the misconduct in the complaint ([Guidelines for Investigations](#), CHS Alliance, 2015, p.78).

### 1.3 Document carefully - following a victim/survivor-centered approach

DO	DO NOT
Ask and document the victim/survivor's informed consent to share information, after having described what you will do with the information given and the next steps.	Contact the subject of complaint or anyone else allegedly involved in the matter.
Inform that you are obliged to report the incident to respective investigatory actors but remind the victim/survivor that reports can be done anonymously.	Pressure the victim/survivor to have their name appear in the report.
Acknowledge that the victim/survivor may wish to receive information on assistance, support and protection. Inform the victims/survivors as to the availability of support services and offer to link the victim/survivor with somebody who can orient them to services if needed, such as the CCM Ethics Function, Global Fund PSEAH Coordination Unit, or OIG.	Attempt to provide specialized assistance or services to victims/survivors in areas where you are not specialized.
Repeat & check your understanding of the situation.	Jump to assumptions, draw premature conclusions, or fill in gaps with what you suspect might have happened.
Include in your report only the basic information about the allegation (who, when, where, what) and how the person can be contacted again.	Share unnecessary details or personal information that could compromise the confidentiality and privacy of the victim/survivor.

### 1.4 Report to the Global Fund<sup>6</sup>

DO	DO NOT
Report the concern or allegation immediately to the Global Fund through formal CCM channels, (e.g., reporting through the CCM Ethics Function) or directly to the Global Fund via:  Email: <a href="mailto:hotline@theglobalfund.org">hotline@theglobalfund.org</a> or <a href="mailto:report.SEAH@theglobalfund.org">report.SEAH@theglobalfund.org</a> Telephone: +1 704 541 6918 (free service) Online report: <a href="http://www.ispeakoutnow.org">www.ispeakoutnow.org</a>  If possible, keep written records of what you said to whom, when and the responses you got.	Attempt to investigate the allegation yourself. In case of doubt, ask for guidance from the Global Fund.  Discuss the allegation with anyone except the Ethics function in your CCM, the OIG investigation team, or Ethics/PSEAH Coordination Unit staff to maintain confidentiality.

For confidential advice, please contact the Global Fund Ethics Office or the Protection from Sexual Exploitation, Abuse, and Harassment Coordination Unit (PCU):

[ethics@theglobalfund.org](mailto:ethics@theglobalfund.org) or [pseah@theglobalfund.org](mailto:pseah@theglobalfund.org)

<sup>6</sup> If the host country laws foresee mandatory reporting of alleged SEAH cases to the relevant state authorities, the involved parties shall ensure that any and all processes are carried out with due consideration of and in compliance with applicable host country laws.