

INTERNATIONAL LABOUR ORGANIZATION

Action Plan to Prevent and Respond to Sexual Exploitation and Abuse (2025)¹

REQUIRED OUTCOME ²	OUTPUT	KEY PLANNED ACTIVITIES	TIMEFRAME
1. Leadership Accountability and Compliance: Leaders and managers at all levels foster a respectful and safe working environment and are accountable for PSEA implementation.			
Outcome 1.1 Senior leaders and managers at all levels, communicate clear expectations regarding the standards of conduct and create and maintain a working environment which promotes a respectful and safe culture, where individuals can speak out against misconduct.	All personnel in supervisory or management positions are made aware of their PSEA accountabilities, including the duty to prevent and address SEA, ensure protection from retaliation and provision of assistance for victims/survivors and witnesses.	A. Continue examining departmental and managerial accountability, roles and responsibilities on PSEA (at HQ and regional levels) and reflect roles and responsibilities in updated PSEA policy.	Q1-Q4
	The responsibilities of supervisors and managers regarding PSEA are clearly defined in PSEA policy and in their terms of reference. The repercussions for not fulfilling duties with respect to PSEA are outlined in relevant policies and procedures.	B. Ensure leaders, managers and supervisors are aware of their responsibilities in relation to protection from retaliation and to fostering a safe and respectful work environment, free from all forms of violence and harassment (including SEA) and integrate specific duties in terms of reference, and performance evaluation processes.	Continuous
		C. Require supervisors and managers to sign a pledge to appropriately address all SEA reports, as per the relevant ILO framework.	Q1-Q4
Outcome 1.2 Leaders at all levels within the entity at both headquarters and field locations, are aware of and implement their PSEA responsibilities and take appropriate actions to	Senior Leaders certify through Compacts or Management Letters that instances involving credible allegations of SEA from their areas of responsibility have been accurately and fully reported and investigated.	A. ILO Director-General presents to the UN Secretary-General an End-of-Year Management Letter, duly taking into account relevant certifications. Information is also shared with Chair and Vice-Chairs of the ILO Governing Body (GB).	Annually

¹ The *ILO Action Plan to Prevent and Respond to Sexual Exploitation and Abuse* is implemented by the ILO PSEA working group, composed of the PSEA Officer, the Ethics Officer, the Senior Risk Officer, representative(s) of CABINET, the Office of the Legal Adviser (JUR), the Office of Internal Audit and Oversight (IAO), the Human Resources Development Department (HRD), the Treasurer and Financial Comptroller (TR/CF), the Department for Multilateral Partnerships and Development Cooperation, the Financial Management Department, the Communication and Public Information Department (DCOMM), the Procurement Bureau, the Gender, Equity and Diversity Inclusion Branch (GEDI) and the Priority Action Programme/Crisis.

² The structure, outcomes, outputs and indicators of the action plan from (1 to 5) are based on the template provided by the *Office of the Special Coordinator on improving the United Nations response to sexual exploitation and abuse (OSCSEA)*. Outcome 6 provides a space to add ILO-specific outputs and planned activities.

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prevent and respond to reports /allegations of SEA.		B. Directors and other officials with management responsibilities certify through an internal letter of representation that they have promptly and accurately reported situations that may involve SEA in the context of any ILO activity to IAO. IAO is informed of any reports of SEA in the internal letter of representation.	Q1 (February) – Annually
		C. Annual reports of the Ethics Officer (until year ending 31 December 2024), the Chief Internal Auditor and the Senior Risk Officer – to the GB – encompass PSEA.	Annually
		D. Leadership training/guidance is provided to ensure that leaders and managers fulfill their PSEA responsibilities including adherence to PSEA policies and processes, ensuring that all personnel have received required training, that there is no retaliation against whistleblowers and that SEA reports are properly handled.	Q3-Q4
		E. PSEA focal points are in place in all regional and country offices as well as in ILO project locations.	Q1
		F. Present to the Global Management Team (GMT), an annual PSEA update, highlighting progress made, challenges and priorities.	Annually
2. Policy and Oversight: Entity-specific policy frameworks and a code of conduct, applicable to all categories of personnel, that address sexual exploitation and abuse, are available and communicated to all personnel, and dedicated resources and structures are in place to support policy implementation.			
Outcome 2.1 A policy framework to provide effective protection from sexual exploitation and abuse (PSEA) is developed, disseminated, implemented, and reviewed regularly to ensure it remains up to date, and reflects best practice.	PSEA policies and procedures, including standards of conduct, and a work plan to implement them are in place and reviewed regularly.	A. Update existing policies and procedures (including Office Directive 568 on Prevention and Response to SEA) to ensure consistency, address gaps identified and align with international standards.	Q1-Q2
		B. Update ILO <i>Principles of Conduct</i> to integrate importance of preventing and combatting all forms of violence and harassment, including SEA.	Q1-Q4
		C. Further examine mechanisms to enforce protection against retaliation (PaR), based on emerging trends and ILO’s needs. Continue raising awareness on reporting misconduct and protection from retaliation.	Continuous
		D. Update the PSEA action plan regularly and share on annual basis with UN Secretary-General.	Continuous
		E. Participate in inter-agency PSEA Working Groups and international events, with a view to benchmarking progress, sharing knowledge and benefitting from the experience of other entities.	Continuous

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	PSEA policies and related frameworks are disseminated to ILO's workforce.	F. Relevant policies and accountability frameworks are widely communicated and disseminated. G. Regular communication and engagement of all heads of Country Offices, managers, and response leaders. H. Regular staff engagement through trainings, webinars, clinics and regional townhalls.	Continuous
	Staff members are aware of their obligation to report SEA.	I. Integrate SEA refreshers into recruitment, onboarding, and training (of all staff, managers, and interns). J. Update IAO public website and make it available in the three official languages.	Q1-Q2
	PSEA clauses are included in all contractual arrangements/agreements between ILO and third parties.	K. Assess and review ILO's legal framework and agreements with third parties with a view to strengthening protection from retaliation, adoption of protective measures pending investigation and corrective actions to address SEA incidents by the personnel of such parties (including implementing partners, grantees, contractors/suppliers, external collaborators (referred to as "excolls")). L. Review funding partners agreements to integrate PSEA clauses.	Q1-Q2 Q1
		M. Review frameworks and require all excolls to complete PSEA training and provide proof of completion. N. Confirm vendor ³ 's eligibility through vendor's self- certification and undertake individual assessment of vendors by ILO officials, including through UNGM, at different stages of the procurement/contracting process. In accordance with the ILO Policy against fraudulent and other proscribed practices (IGDS No. 69), the ILO Vendor Review Committee is tasked with the review of allegations of proscribed practices (including unethical practices, e.g., SEA) and the determination of the applicable sanctions against vendors.	Q1
	PSEA tasks and responsibilities are clearly defined and assigned at the institutional level,	O. The PSEA Working Group has the overall responsibility for the development and implementation of the PSEA policy and activities. It	Continuous

³ Vendor is understood as any external collaborator, grantee, implementing partner, contractor or supplier of goods or services.

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	through the creation of a dedicated taskforce and function for the development, implementation, monitoring and coordination of PSEA activities.	meets on a quarterly basis to discuss progress made in the implementation of the PSEA policy and action plan.	
		P. A dedicated PSEA function is in place with a direct reporting line to the Director-General (PSEA OFFICER).	Continuous
		Q. The PSEA Officer is responsible for the overall coordination of ILO's efforts to prevent and respond to SEA and reports regularly to CABINET/DG and senior management on progress made and difficulties encountered, as needed.	Continuous
	PSEA policies are communicated to all staff and mechanisms are in place to track policy implementation.	R. Establish a PSEA country leaders and focal points network across ILO's offices and projects, to enhance prevention, reporting and response efforts and ensure ILO's representation in local inter-agency networks.	Q1
	A dedicated PSEA country focal point has been identified for each duty station and tasked with the overall responsibility for monitoring the implementation of the PSEA policy and activities, and reporting progress to country directors. PSEA responsibilities are reflected in performance appraisals.	S. Ensure apposite trainings are obtained by designated leaders and focal points and progress is monitored through periodic calls. Provide guidance and support to the network, including through the review of inputs to country level action plans.	Continuous
		T. Define PSEA leaders and focal points tasks. Ensure that the role performed by focal points is recognized and reflected in performance appraisals and managerial responsibilities.	Q1
		U. As members of UNCTs, ILO field offices feed into country level action plans and are supported by the PSEA OFFICER.	Continuous
3. Victim-Centered Approach: Every beneficiary and member of the communities we serve has access to confidential, safe, and gender-, child- and culturally sensitive mechanisms and pathways to report SEA, which ensure that the rights and dignity of victims are prioritized, and their needs addressed, following the United Nations Comprehensive Strategy on Assistance and Support to Victims of Sexual Exploitation and Abuse & the UN Protocol on the Provision of Assistance to Victims of Sexual Exploitation and Abuse.			
Outcome 3.1 Safe, accessible, confidential, and gender-, child-, and culturally sensitive reporting mechanisms are in place in all locations where the entity has a presence.	Confidential, safe and accessible complaints mechanisms are in place, and procedures for handling SEA allegations, including timelines for referrals exist, and are disseminated across ILO's projects and activities.	A. Establish and strengthen confidential, safe, gender and child-sensitive SEA reporting mechanisms in all locations where ILO has a presence.	Q1-Q4
		B. Operationalize ILO hotline for reporting misconduct (including SEA) and make available online complaint form on ILO public website.	Q2

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		C. At the field level, establish community feedback mechanisms and community-based complaints mechanisms in all locations where ILO conducts its activities.	To be determined
	Information on how and where complaints of SEA can be made and how assistance can be accessed is disseminated to all entity personnel as well as members of the local community where the ILO conducts its activities.	D. Develop and disseminate public messaging on what constitutes SEA, its prohibition in local languages through appropriate channels.	Q4 (of previous year) - Q3
		E. Upon operationalization of ILO hotline, ensure information on how and where to report SEA incidents is readily available to all personnel, covering both internal cases and those they may become aware of.	Q2-Q3
	A Standard Operating Procedures (SOP) on how to report, manage and respond to SEA allegations is in place and communicated to all relevant personnel.	F. Develop SOP for PSEA focal points to ensure clear, formal reporting mechanisms for incidents of SEA at both at the field level and headquarters. Outline referral pathways for victim support, ensuring they are accessible and widely communicated to all relevant personnel. The SOP is sent by email to all relevant parties and saved at a specified location on shared drive. The SOP is reviewed annually and updated as necessary.	Q1-Q2
Outcome 3.2 Adequate funding and mechanisms are in place to ensure comprehensive support and assistance to victims/survivors, including child victims and, where relevant, children born of SEA, and to address their specific and lifelong needs.	Adequate financing and funding mechanisms are in place to ensure that survivors can be assisted in a reliable, swift, flexible, empowering manner, including assistance for children born of SEA to address their specific/ lifelong needs, or transnational legal paternity claims.	A. Discuss resource allocation for the provision of holistic assistance and services to SEA victims/survivors and contribution to pooled contingency funds for victim support at the UN country team level.	2025
Outcome 3.3 The entity adopts a victim/survivor-centered approach in its response to SEA, including investigations, and establishes a support function to guide victims/survivors and ensure they are regularly informed of the investigation's progress.	Policies reflect a victim/survivor-centered approach, and guidance regarding support and assistance to victims/ survivors, including child victims and, where relevant, children born of SEA.	A. Provide regular briefings to PSEA leaders and focal points to ensure awareness of a victim/survivor-centered approach and that the needs and wants of the victims are considered at each step of the process (e.g. that confidentiality is maintained throughout the process; respect for victim/ survivor consent; and that victims/survivors are updated on the progress of the investigation on a regular basis).	Continuous

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4. Investigations and Accountability: Allegations of SEA are reported, assessed, and referred to investigations in a timely manner, and all substantiated cases are addressed in accordance with the organization's rules and regulations.			
Outcome 4.1 Standard investigation operating procedures or equivalent are issued and used to guide the investigation practice.	Standardized procedures help maintain a high quality of investigations by ensuring all necessary steps are followed, including for investigations involving children.	A. Update the Investigation Charter and SoPs for Investigations to take due account of SEA and enhanced whistle-blower protection.	Q1-Q2
		B. Examine special considerations to be provided when conducting investigations involving children.	Q1-Q2
		C. Enter all SEA allegations (upon receipt) into UN SEA tracker	Continuous
Outcome 4.2 The entity has mechanisms to ensure accountability including prompt reporting, assessing, and investigating allegations of SEA in a victim/survivor-centered approach.	Written procedures on handling complaints or reports from staff members, complainants, and victims, including SOPs for filing and handling complaints, are in place.	A. Develop, disseminate and implement procedures and protocols for victim-centered investigations.	Q1-Q2
		B. Integrate use of E-IRF in relevant procedures and review in an ongoing manner organizational approach to ensure coherence.	To be determined
		C. Track and report progress on the status of investigations. Ensure full and faithful reporting using iReport SEA Tracker and include PSEA in Annual Reports of Chief Internal Auditor. See also Outcome 3.1.	Continuous
	Mechanisms are in place to ensure that the investigative process is explained to victims/survivors, and that they are updated on the progress of the investigation. regularly, on a schedule consulted with the victim/survivor.	D. Develop an information handout in local language that explains the investigative process and victims' rights.	Q1-Q4
		E. Consult with victims/survivors to determine how often and by what method they would like to be updated on progress of the investigation.	Q1-Q4
	Investigations into reports of SEA are conducted by personnel who have received training on PSEA and victim-centered approaches.	F. Investigators are trained in using a victim-centered approach to investigations. G. Ensure where external investigators are retained that they meet minimum requirements. H. Only investigators trained in appropriate child interviewing techniques will interview children.	Continuous
Outcome 4.3 All SEA reports/complaints are assessed, without discrimination, and where appropriate, investigated thoroughly.	Written procedures on handling complaints or reports from staff members, complainants, and victims, including SOPs for filing and handling complaints, are in place.	A. An SOP, detailing the steps to be followed when personnel receive a report of SEA from any individual are drafted. These SOPs are disseminated to all personnel and are easily accessible on the Intranet and in other relevant policy documents.	Q1-Q3

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Perpetrators in any substantiated cases are held accountable in accordance with the policies and procedures of the entity.	Any individual who is found not to have complied with policy, either through committing acts of SEA, or non-compliance with reporting requirements and/or protection from retaliation, is held accountable. Penalties for non-compliance will be commensurate with the severity of the offence and the role of the individual.	B. Ensure all supervisors and managers receive clear instructions on referral processes for victims/survivors support and assistance, as well as their duty to protect participants in SEA investigations from retaliation. Supervisors and managers are held accountable for failure to address reports of SEA.	Continuous
	The outcomes of investigations and disciplinary actions taken when SEA allegations are substantiated are reported and disseminated.	C. All investigation outcomes are reported through appropriate channels, including via the Information Note on <i>Disciplinary cases</i> and/or a user broadcast. D. For accountability and transparency purposes, an online dashboard on disciplinary actions taken on substantiated investigations is made available and regularly updated.	
5. Prevention, Training, Awareness, and Risk Management: The entity undertakes proactive prevention measures, including through training and awareness raising, screening and vetting of personnel, conducting risk assessments, and implementing robust risk mitigation measures in its programs and activities, including with implementing partners.			
Outcome 5.1 Clear policies and guidance to ensure that mandatory, continuing training on protection from SEA, including mandatory reporting requirements are in place. Compliance with training requirements is monitored.	All staff and non-staff are enrolled in and complete mandatory e-learning on PSEA.	A. Require all staff and non-staff (including excolls) to complete mandatory on-line PSEA training. A mechanism to monitor compliance with this requirement is developed and a regular follow-up is done with concerned staff and individuals.	Continuous
	Compliance levels are reported to entity senior management for inclusion in annual Management Letters.	B. Compliance rates for PSEA online course are reported to senior management for inclusion in the year-end Management Letter.	Q1 (February) - Annually
	Mandatory periodic follow-up or refresher training is provided, and compliance is monitored and reported to senior management for inclusion in annual Management Letters.	C. Complement the online mandatory training with scenario-based modules accessible through the e-learning platform and/or reviewing time validity of mandatory training.	Q1-Q2
Outcome 5.2 Appropriate risk assessments are undertaken on a regular basis and mitigation measures	Comprehensive SEA risk assessments are conducted at appropriate levels (e.g., organizational, programme, or project). Risk	A. Develop corporate risk assessment on SEA and identify measures to mitigate the risks in this action plan (based on ILO SEA data results from UN PSEA annual survey and other relevant tools).	Q1-Q3

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are developed and implemented where required.	mitigation measures are developed and implemented for all entity activities and in all locations. These measures are reviewed regularly and amended or updated as required.	B. Embed relevant questions on the matter in risk registers for field offices and projects, as well as policy outcomes. Review risk register questions upon completion of risk assessment exercise above.	Q3
		C. Develop best practices and/or guidelines for a successful management of SEA risks in ILO's country and project location (in consultation with relevant departments and offices).	To be determined
	Effectiveness of existing risk mitigation measures is evaluated as part of the annual risk assessment update.	D. The risk assessments are reviewed annually or when there are significant changes in activities or operations. Existing mitigation measures from the previous year's Action Plan are evaluated to ensure they effectively address identified risks and are adjusted to enhance effectiveness.	2026 onwards
Outcome 5.3 Human Resources personnel and hiring managers ensure that rigorous background checks are conducted for job applicants and other personnel, including screening for prior history of misconduct or SEA issues using Clear-Check and/or the Misconduct Disclosure Scheme.	All prospective personnel are vetted using Clear Check and the Misconduct Disclosure Scheme. Personal references and former employers are contacted; self-declarations are required.	A. The prohibition of SEA is reflected in all vacancy announcements. B. Clear Check is fully implemented for all types of employment contracts and adherence to the Misconduct Disclosure Scheme is assessed. C. All staff/new recruits are required to sign a code of conduct or self-declaration on PSEA which is maintained on file. D. All management appraisals evaluate efforts to create a respectful environment that prevents SEA.	Q2-Q4
Outcome 5.4 The entity has clear standards and harmonized due diligence processes in place to ensure that implementing partners, grantees, excols and contractors/suppliers	Agreements with implementing partners, grantees, excols and contractors/suppliers include zero tolerance language with respect to SEA. The ILO can terminate the arrangement in the event that SEA occurs and is not adequately addressed by the third-party.	A. Ensure that all agreements, contracts and terms and conditions with third parties (including implementing partners, grantees, vendors and external collaborators) contain clauses that require active prevention and protective measures and allow for termination for non-compliance with or violation of these additional PSEA standards.	Q1-Q4

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prevent and respond to SEA and abide by ILO's PSEA standards.		B. Review relevant IGDSs, including Office Procedure 270 on <i>Implementing partnerships</i> to include due diligence considerations in relation to the prevention and response to SEA (draft other IGDS, as necessary). C. Adopt proactive due diligence measures and review relevant instruments to embed PSEA – e.g.in IP self-certification and step by step procedure for implementing agreements. D. Present updated framework and IP Protocol requirements to Global Finance Team.	Q3-Q4
	Implementing partners have adequate PSEA safeguards in place. Requirements for completion of trainings (by the personnel of the third party), screening of candidates, reporting SEA incidents, and other provisions/mechanisms to address SEA are assessed and documented.	E. With regard to implementing partners: - consider use of UN Partner Portal for PSEA capacity assessment of implementing partners; - determine roles and responsibilities for the conduct of due diligence processes at field level (starting with a pilot in PROSPECTS during 2025); - provide personnel concerned with training opportunities or materials and resources (e.g. through the UNPP); - conduct PSEA capacity assessments of implementing partners in line with the IP Protocol and harmonized assessment tool.	Q2-Q4
	Contractors/suppliers under a contract with the ILO have adequate PSEA safeguards in place. Guidance is available to ILO responsible officials involved in procurement operations to promote ILO's alignment with UN best practices.	F. With regard to contractors/suppliers, PROCUREMENT will participate in the Inter-Agency WG on PSEA and private sector, in liaison with the Sustainable Procurement WG of the High-Level Committee on Management Procurement Network (HLCM-PN) to map existing practices across the UN on Human Rights Due diligence, in particular in relation to PSEA with a view to reflecting such practices in PROCUREMENT guidance materials (for responsible officials involved in procurement operations).	Q1-Q4

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		G. As part of the ESS framework⁴: - consider and implement measures to further mainstream the ILO PSEA policy into project materials/guidelines such as learning tools, materials, and events (e.g. DC Learning Pathways); - update design, appraisal and project reporting templates and guidelines (e.g. project proposal template, appraisal checklist, etc.), in line with relevant and upcoming IGDS. Engage, at entity level, consultant to formulate a plan to develop ILO Environmental and Social Sustainability (ESS) Framework with a view to producing practical guidance materials that encompass Accountability to Affected Populations, SEA risks, mitigation and monitoring measures. Namely, SEA as part of the ESS screening checklist, short report focusing on key considerations for adapting the UN EMG Model Approach on Environmental and Social Standards (MA), and guidance note on ESS risks.	Q3-Q4
6. Additional outputs and actions resulting from ILO's approach to PSEA.			
Outcome 6.1 PSEA standards and requirements are communicated widely and clearly to staff, constituents, partners and beneficiaries.	PSEA communication materials are developed and enhanced, in line with ILO's mandate, values and standards in preventing all forms of violence and harassment, including SEA.	A. Update 2024 campaign materials and pages (posters, banners, cards intranet and web pages) to reflect relevant developments in relation to PSEA framework, functions, reporting mechanisms, etc.	Q1-Q2
		B. Develop additional communication actions and materials to further strengthen awareness raising efforts on PSEA.	
		C. With the support of Regional/Country Office Directors, ensure that awareness raising materials are printed/displayed in all ILO country offices.	Q1-Q4
		D. Integrate PSEA messages in the draft DG's message on the International Day for the Elimination of Violence against Women.	Q3-Q4
		E. Integrate PSEA communication materials in the media campaign during the 16 days of activism against gender-based violence.	Q3-Q4
Outcome 6.2 PSEA is integrated and mainstreamed in ILO Crisis responses SoPs and programming tools.	PSEA included in SOPs, programming and Conflict analysis tools.	A. Review Crisis Response SoPs and include PSEA component.	Q1-Q2

⁴ DC Learning Journey on Compliance and Accountability for ILO staff includes topics on: UN policies and practices on PSEA; MOPAN assessment and funding partners' expectations on ILO's PSEA framework; Application of ILO PSEA standards and guidelines to ILO's implementing partners and project beneficiaries.

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Outcome 6.3 PSEA is integrated and mainstreamed in ILO's activities, projects and events.	Procedures are in place to ensure awareness on and application of the ILO standards and to uphold the Office's zero tolerance for inaction against SEA in its activities, projects and events.	A. Issue user-friendly guidance and learning and awareness raising on ILO's approach to PSEA, for ILO staff, constituents, implementing partners, workers' and employers' organizations and other parties involved in the implementation of ILO's projects.	Q1-Q3
		B. Ensure systematic distribution of <i>Code of Conduct for prevention of all forms of violence and harassment</i> prior to and during relevant events, trainings, conferences, etc. Discuss enforcement of the Code, e.g. through establishment of internal protocol including complaint process, reporting mechanisms for third parties, and immediate reactive measures for situations warranting ILO's urgent attention.	Q1-Q2
BUDGET: The ILO PSEA activities are led and coordinated by a PSEA OFFICER (P4). The implementation of this action plan is subject to the availability of human and financial resources. The budget allocation for the implementation of this action plan may be updated throughout the year.			