Inter-Agency Risk Assessment (IARA)on Sexual Exploitation and Abuse (IARA SEA) in Sudan – Executive Summary

CDF Sudan and Sudan PSEA Network – Strategic Advisory Group (SAG)

Executive Summary

According to SEA Risk Overview (SEARO) Index of 2024, recipients of aid in Sudan are at higher risk of SEA by aid workers. Triggered by the continued conflict and the ever-increasing demand for humanitarian support, Sudan PSEA Network, committed to preventing and responding to SEA, recognizes the urgent need for a comprehensive understanding of the current SEA risk landscape across Sudan as well as for prioritized recommendations for mitigation measures. This country-level Inter-Agency Rapid Assessment (IARA) on SEA is the first in Sudan amid conflict covering 12 states either directly affected by conflict or hosting displaced people.

This study synthesizes secondary data, including inter-agency assessments, response plans, and surveys, to analyze the risks of Sexual Exploitation and Abuse (SEA) within the humanitarian context of Sudan, drawing comparisons with high-risk environments like South Sudan. This rapid but comprehensive assessment involved desk review. It also included key informants' interviews as well as focus group discussions with government and NGOs actors, PSEA Focal Points, frontline staff and displaced communities. The findings, examined through the lens of a standard SEA dimensions framework (Context, Program Operations, Aid Worker Conduct, and Community Factors), reveal a consistently high likelihood of SEA, exacerbated by ongoing emergencies, displacement, and socio-economic vulnerabilities.

While a commitment to PSEA integration and survivor assistance is evident in policy and strategic planning, significant systemic and operational gaps impede effective prevention and response. These include weaknesses in inter-agency coordination, inconsistent SEA risk assessments, inadequate reporting mechanisms, insufficient and inconsistent PSEA training for personnel, and challenges in the consistent implementation of safeguarding measures across program operations. These gaps are collective responsibility of the humanitarian actors such as NGOs, UN agencies and government counterparts.

Issues related to aid worker conduct, such as underreporting and a lack of comprehensive understanding of SEA principles, further compound the risks. Despite community condemnation of SEA, barriers to reporting and a lack of trust in existing channels hinder community-led protection efforts.

However, the study also identifies crucial existing synergies that offer a foundation for strengthening PSEA. Leveraging established GBV and Child Protection referral pathways, the presence of inter-agency PSEA networks, the development of inter-agency SOPs, and the emergence of community-based PSEA initiatives represent key opportunities for building a more robust safeguarding framework.

The analysis of the data involved the identification of most significant SEA risks, which was categorized under the four dimensions of the IARA SEA Frames work: enabling environment, context, operational context and protective environment.

Key Findings: The highest SEA risks are found to be:

Dimension 1: Enabling Environment

- Lack of a clearly defined unified PSEA policy leading to inconsistencies in implementation and comprehensiveness across different government entities and sectors.
- The varied and often non-specific approaches of vetting systems increasing the vulnerability of individuals to abuse by government personnel with undetected histories of SEA.

Dimension 3: Operational Context

- Programs involving direct interaction with beneficiaries, especially during aid distribution and when targeting vulnerable groups, carrying a higher risk of SEA.
- Individuals holding positions of power or authority within aid organizations, government entities, service providers, and influential community members being the primary actors likely to commit SEA.

Dimension 2: Context

- Significant challenges in registration, selection, and distribution processes increasing the risk to SEA within vulnerable groups, i.e., IDPs, refugees, returnees, host communities, who are unaware of aid worker Codes of Conduct and the free provision of assistance.
- The varying levels of understanding of what constitutes SEA among frontline staff leading to a failure to prevent, identify, or report SEA.

Dimension 4: Protective Environment

- Significant gaps in PSEA Focal Points' interagency collaboration, legal knowledge, referral expertise, and overall resources and skills creating risks of ineffective survivor assistance and poor coordination. For instance, inactive PSEA network in some of the states and where it exists, not all representers are keen to attend the meetings.
- Fear and lack of trust in community, e.g., committees, representatives, leaders, and staff reporting channels acting as significant barriers to disclosing SEA incidents.

Prioritized Recommendations

- Develop and enact a comprehensive, unified inclusive national PSEA Policy applicable across all
 government entities and sectors, coupled with the standardization and strengthening of vetting
 procedures for all government personnel, as well as capacitating the Focal Points.
- Streamline and improve the transparency and accessibility of registration, selection, and distribution processes, alongside implementing mandatory, comprehensive, and regularly refreshed PSEA training for all frontline staff.
- Implement robust inclusive PSEA risk assessments for all programs involving direct beneficiary
 interaction and establish clear protocols and Standard Operating Procedures (SOPs) for these
 interactions, coupled with the rigorous vetting and enforcement of clear Codes of conduct (CoC) for
 all staff and partners, particularly those in positions of authority.
- Provide comprehensive and ongoing capacity-building for PSEA Focal Points focusing on key areas like
 inter-agency collaboration and referral pathways as well as inclusive approaches, e.g., targeting
 persons with disabilities, alongside establishing and promoting safe, confidential, and accessible
 reporting channels for both communities and staff, including robust whistleblower protection.
- Community outreach PSEA awareness activities to increase and encourage reporting.
- Inclusive, safe, confidential, and diversified FAMs for SEA reports especially for vulnerable people.
- Appointment of at least two PSEA Focal Points (one man and one woman) in each community to encourage SEA reporting from both sexes.

• To increase the accountability of vendors and non-NGO figures who deal directly with the community by training them on PSEA and signing PSEA Code of Conduct.

Conclusion

To effectively mitigate SEA risks and ensure accountability in Sudan, a comprehensive and multi-faceted approach is urgently required. This necessitates a concerted effort to address the identified gaps through enhanced leadership and prioritization of PSEA at all levels, improved inter-agency coordination and information sharing, systematic and regular SEA risk assessments integrated into program design, the establishment of safe and accessible reporting channels with robust whistleblower protection, mandatory and ongoing comprehensive PSEA training for all personnel, and the consistent application of survivor-centered approaches in all interventions. Crucially, capitalizing on existing synergies through dedicated strengthening, resourcing, and sustained commitment is paramount to translate policy into tangible protection for the vulnerable populations in Sudan, including those in high-risk areas, especially those who are at higher risk, such as persons with disabilities.