PARTNERSHIP APPROACH TO PROTECTION FROM SEXUAL EXPLOITATION, ABUSE AND HARASSMENT AND GENDER-BASED VIOLENCE

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GPE Transforming Education

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Purpose of this document

Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) within the delivery of the GPE program of work is a shared responsibility. All partners must play an active role in reporting and addressing sexual exploitation, abuse and harassment (SEAH) incidents as they occur. This document outlines the strengthened measures for all GPE partners involved in the implementation of GPE grants to prevent, mitigate and respond to incidents with regard to SEAH in the delivery of GPE grants. This document also illustrates how the partnership acknowledges and responds to gender-based violence (GBV) in contexts where grants are delivered. It is recognized that broader attitudes to and the nature of common forms of violence have a direct influence on the likelihood of SEAH incidents occurring and being reported in grant-based activities.

This document highlights the key entry points for proactive risk mitigation, monitoring and reporting across grant making aspects of the partnership.

This document also focuses on **grant making responsibilities and processes** under the GPE PSEAH policy. For protocols concerning GPE governance actors and Secretariat staff, please see the broader GPE PSEAH policy. PSEAH protocols concerning these actors are managed through GPE governance guidance and World Bank staffing processes.

Introduction

The perpetration of sexual exploitation, abuse and harassment (SEAH) is systemic and continues across many societies and contexts. As a form of gender-based violence (GBV) and an abuse of power, SEAH inflicts harm not only on individuals but has an impact on families and entire communities and is also a human rights violation. Education has a profound impact on the future—for individuals, communities and economies. **But education systems only deliver on their promise when both learners and educators are safe.** Where girls and boys are safe in and around school, in their communities and homes: they learn. Where they or the adults who support their learning are exposed to physical, psychological or sexual violence: learning stalls, teachers leave, systems weaken and public investment is wasted. Experiencing violence can have lifelong and even intergenerational impact on individuals, families, communities and society. Individually and collectively, governments, international organizations and civil society have an important role to play in SEAH prevention and response. Actors across the development community and beyond have a responsibility to increase efforts to ensure safer environments and to prevent SEAH within their agencies and beyond.

GPE has zero tolerance for sexual exploitation, abuse and harassment of any kind. GPE is committed to addressing all forms of SEAH. This partnership approach document sets out the roles and responsibilities of GPE actors to prevent, mitigate and respond to incidents of SEAH alongside integrating efforts to address broader gender-based violence within the contexts that grants are being delivered. This GPE policy reflects GPE's international commitments to address SEAH in development cooperation and humanitarian assistance.[1]

Definitions and distinctions

Sexual exploitation: refers to "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 abuse of another."[2] For example, coercing individuals into engaging in sexual activities in exchange for aid, services, employment opportunities or other benefits.

[1] Whistler Declaration on Protection from Sexual Exploitation and Abuse in International Assistance 2019; DAC recommendation on Ending Sexual Exploitation, Abuse, and Harassment in Development Cooperation and Humanitarian Assistance the commitments made by donors in at the 2018 United Kingdom Safeguarding Summit and the DAC Recommendation on Ending Sexual Exploitation, Abuse, and Harassment in Development Co-operation and Humanitarian Assistance 2018.

[2] UN Secretariat, Special Measures for Protection from Sexual Exploitation and Sexual Abuse, ST/SGB/2003/13, UN Secretary-General's Bulletin (2003).

Sexual abuse: refers to "the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions." [3] All sexual activity with a child is sexual abuse. This includes sexual assault, rape, molestation and other forms of non-consensual sexual activity.

Sexual harassment: Sexual harassment means any unwelcome conduct of a sexual nature that may reasonably be expected or be perceived to cause offense or humiliation when such conduct: interferes with work; is made a condition of employment; or creates an intimidating, hostile or offensive work environment. Sexual harassment may occur in the workplace or in connection with work. It may occur between persons of the same or different genders. It may occur between staff or involve staff and an external party such as clients, vendors, contractors and external partners.[4]

Protection from sexual exploitation, abuse and harassment (PSEAH): measures taken by an organization to protect people from sexual exploitation, abuse and harassment by staff and programs. It covers prevention, mitigation and response.

Safeguarding: A broader term than PSEAH, means preventing harm to people in the delivery of humanitarian or development assistance. Safeguarding terminology also includes other non-sexual harms and abuses such as economic exploitation and physical violence or neglect.

Gender-based violence (GBV) is violence that results in or is likely to result in physical, sexual or psychological harm or suffering against someone based on gender discrimination, gender role expectations and/or gender stereotypes or the differential power status linked to gender. It is important to acknowledge that men, women, boys and girls all can experience violence, but to date GBV research, policy making and programming have largely focused on women and girls as structural and systemic gender inequality privilege men with greater power and resources which renders women and girls at far greater risk of harm.

School-related gender-based violence (SRGBV) concerns acts or threats of sexual, physical or psychological violence occurring in and around schools perpetrated as a result of gender norms and stereotypes and enforced by unequal power dynamics. It may refer to the different experiences of violence and vulnerabilities for all learners and may include physical violence or bullying, sexual or verbal harassment, non-consensual touching, sexual coercion as well as assault and rape.

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[3] Ibid. United Nations, *UN Glossary on Sexual Exploitation and Abuse: Thematic Glossary of Current Terminology Related to Sexual Exploitation and Abuse (SEA) in the Context of the United Nations*, 2nd edition (United Nations, 2017).

[4] GPE Policy on protection from sexual exploitation, abuse and harassment 2025.

PSEAH and GBV: Distinctions and linkages



Notes. 'Implementing partners' in this diagram covers actors (staff, contractors and volunteers) within organizations that directly or indirectly receive GPE funds, including grant agents. Grant agents and implementing partners must have PSEAH protocols that prevent or respond to SEAH actions perpetrated by actors they manage, targeted at beneficiaries within the communities they serve, their own staff or partners. PSEAH training for grant agent and implementing agency staff should be informed by context specific attitudes and understanding of local patterns of GBV and SRGBV.

Distinctions between 'gender-based violence' and 'sexual exploitation, abuse and harassment'[5]	
Sexual exploitation, abuse and harassment refers to acts perpetrated by those working in or with development or humanitarian organizations. SEAH always occurs in a work environment or work-related environment including in a program setting or work travel. Within the development and humanitarian sector, PSEAH should be part of an organization's code of conduct. The code of conduct covers behavior in professional as well as personal lives—staff are identified as part of the organization and work-related environments can be as much outside of the office as in it. People at risk of SEAH are an organization's beneficiaries, members of the community or staff.	**Gender-based violence** is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (such as gender) differences between men and women. GBV includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion and other deprivations of liberty. The term "GBV" is most commonly used to underscore how systemic inequality between men and women which exists in every society in the world acts as a unifying and foundational characteristic of most forms of violence perpetrated against women and girls. GBV acts can occur anywhere in public or in private.

Implications for GPE PSEAH policy

- Gender-based violence that occurs in the wider communities where GPE operates does not directly fall under the remit of the GPE PSEAH policy. However, understanding attitudes to and prevalence of GBV is important to contextualize the likelihood of staff and beneficiaries raising concerns, or making reports through PSEAH systems.
- The countries in which partners operate will have context-specific attitudes to different forms of violence across workplaces, schools and communities with varied levels of support from institutions and local services as well as thresholds where people seek help as victim-survivors of acts of violence.

[5] See Resource & Support Hub Understanding SEAH and GBV 2021 for further details on SEAH and GBV.

These context- and environment- specific attitudes to GBV influence when and if actors who fall under the GPE and grant agent PSEAH policies are likely to respect codes of conduct or seek support if they are subject to a form of SEAH.

- Country-level risk assessments conducted for grant design development should include gender analyses that cover the nature and prevalence of violence in schools, communities and workplaces. Findings should be fed into both PSEAH training and awareness raising for staff and partners working under GPE grants as well as into grant design to ensure robust risk mitigation strategies are included to protect beneficiaries from risks of sexual exploitation, abuse or harassment.

Partnership roles and responsibilities

GPE Board	GPE PSEAH policy owner ensuring effective implementation of policy across the partnership and holding GPE partners accountable. The GPE Board is also ultimately responsible for the GPE approach to gender equality and inclusion which includes supporting partner efforts to address the prevalence of gender-based violence within education systems.[6]
GPE Secretariat	Responsible for establishing and maintaining PSEAH systems to ensure accountability across the partnership and providing quality assurance for grant design. This includes: • Communicating with GPE Board (and Board committees) on PSEAH risk monitoring and lesson learning across GPE grant portfolio. • Monitoring and recording SEAH case reporting, overseeing PSEAH elements of grant monitoring. • Facilitating learning and exchange on PSEAH across the partnership. • Prior to grant agent accreditation, conducting due diligence of grant agents PSEAH policies. • Annual training for staff on PSEAH relevant to their roles. • Providing best practice guidelines for country-level grant agent selection processes. • Providing quality assurance that grant designs include evidence-based approaches to addressing GBV where this has been identified as a priority in that country context. • Providing a review of grant agent's SEAH risk rating and mitigation measures for all GPE-funded core grants to ensure alignment of GPE PSEAH policy.

[6] Going further together: A partnership approach to gender equality.

Governments of partner countries

Partner country governments have overall responsibility for safeguarding across the education system. Leadership responsibility to ensure GBV is considered within education policy dialogue and policy reform. This includes identifying weaknesses in coordination among development and, where appropriate, humanitarian partners and support services that could lead to increased risks of the prevention and management of SEAH incidents by GPE grant agents.

Where GPE grant implementation is delivered predominantly through partner government systems (such as through pooled funding/project management units), there should be systems of internal controls for all government officials that seek to prevent, mitigate and respond to SEAH including procedures to support survivors. As per the GPE PSEAH policy, this includes communicating any SEAH incidents involving government officials operating under GPE funds to the Secretariat through the grant agent. This should include measures taken or planned to protect survivors and prevent recurrences of SEAH.

This also recognizes that GPE works with governments affected by fragility, conflict and crisis and operates across a diversity of country contexts and implementation arrangements including contexts where GPE-funded programs are implemented outside government systems. In these circumstances, grant agents are responsible for ensuring that local partners delivering GPE-funded programming have robust SEAH policies and safeguards in place consistent with Inter-Agency Standing Committee (IASC) standards.[7]

- **In practice:** Within GPE 2025, many partner country governments have recognized the need to address GBV within their priority education reforms. Key innovations include: integrating safeguarding within leadership training for headteachers and school mentors and establishing formal GBV response mechanisms as well as teacher and administrator codes of conducts in schools in Somalia; and strengthening GBV prevention and response networks across schools and support services in Nepal.

[7] IASC Minimum Operating Standards PSEA 2024.

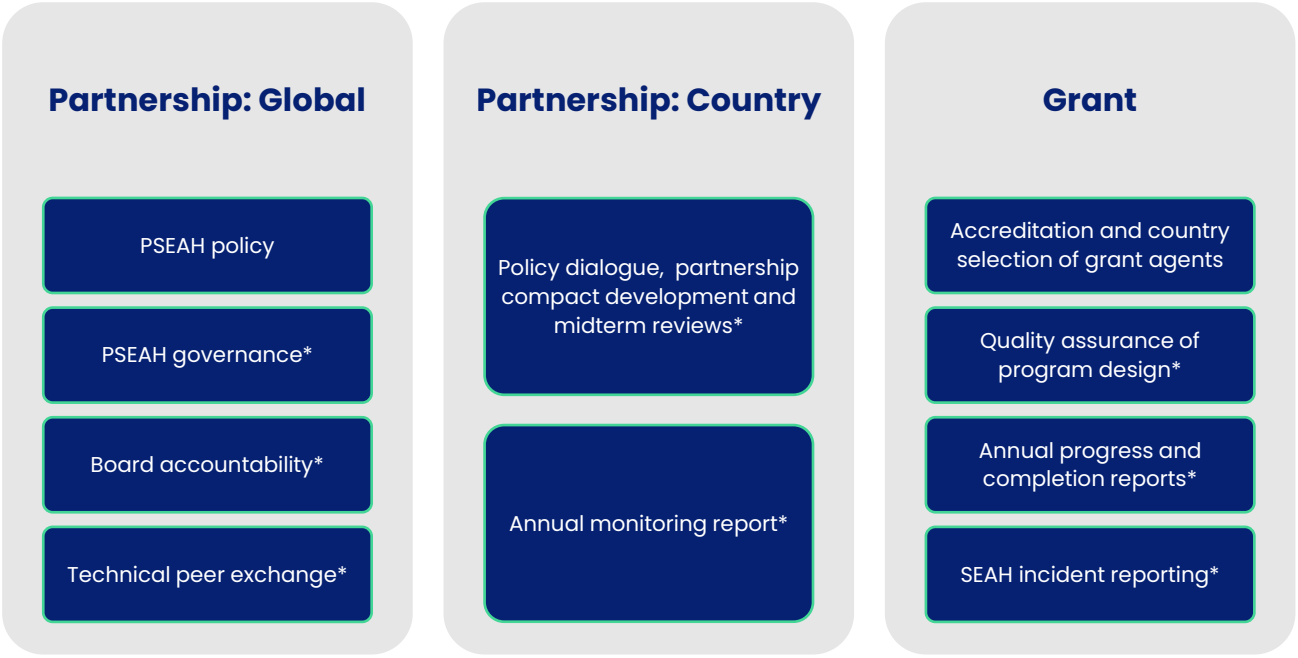
Local education groups	As stated in the GPE PSEAH policy, local education groups play a key role in being vigilant on patterns of SEAH concerns, particularly within pooled funds where GPE grants are integrated in wider system reforms managed by partner country ministries. Members of local education groups are responsible for sharing credible allegations of any SEAH incidents in the education sector within GPE-funded programs with the grant agent or coordinating agency. The local education group is also responsible for integrating evidence about broader patterns or prevalence of GBV within the education sector into policy dialogue exercises to ensure education priority reforms integrate measures to respond and mitigate risks to SEAH and GBV within proposed reforms.
Grant agents	Grant agents are responsible for establishing and maintaining their own PSEAH policies and procedures, including measures to address SEAH incidents in GPE grant-funded operations. This includes: • Meeting GPE PSEAH minimum standards prior to accreditation.[8] • Considering SEAH risk in project development and delivery including capturing mitigation measures and lessons learnt in annual monitoring processes. • Reporting all substantiated SEAH incidents to the GPE Secretariat along with the outcome of investigations and corrective or remedial measures taken. • Conducting due diligence on implementing partners and contractors engaged in delivery of GPE grants. • Grant agents are required to have gender and education expertise available to advise on PSEAH and GBV considerations, mitigation and accountability measures that can be integrated into program design and implementation processes. Grant agent consultations (held in November 2025) indicated interest in prompting earlier dialogue on SEAH risk management in the grant making process. Grant agents were also to share examples of proactive SEAH mitigation and response initiatives used in varied contexts. Reporting on these initiatives within standard monitoring process encourages accountability and visibility of a holistic approach to grant PSEAH responsibilities that goes beyond SEAH incident reporting as the primary measure of PSEAH policy application.

[8] See PSEAH minimum standards in GPE Guidelines Selection Process for Grant Agents May 2024: Appendix 2.

Implementing partners and contractors	Implementing partners are responsible for implementing with sufficient capacity their own PSEAH policies. They are responsible for case reporting according to their PSEAH contractual responsibilities with the relevant grant agent.

PSEAH and GBV entry points across partnership processes

This diagram moves beyond individual partner responsibilities through illustrating how PSEAH and GBV are integrated into GPE processes often involving multiple actors from across the partnership:



*Indicates new or updated process introduced in 2025-2026.

Partnership process 'entry points' across global-, country- and grant-level processes are opportunities to leverage and uphold accountability commitments to protect partners, staff and beneficiaries from sexual exploitation, abuse and harassment.

At the global level:

GPE PSEAH policy	The framework within which the partnership delivers its commitments to prevent SEAH. This includes core principles that run through GPE operations.

PSEAH governance	GPE risk framework indicators on PSEAH *[*update due for GPE 2030]* **Code of Conduct**: Designed to help inform the expected behavior of GPE Board of Directors, standing committees, partner focal points and GPE-funded delegates during participation in GPE activities and interaction with fellow governance officials and members of the Secretariat.
Board accountability	• Delivered through **biannual PSEAH Secretariat updates**: with midyear update. • **Updates will include** *[*updated 2026]:* Aggregated case incident reporting from across all grant agents; lessons learned drawn from compact annual monitoring report, midterm reviews, grant level annual progress reports which include risk assessment and mitigation efforts within proposed program design and implementation; lessons learned from grant quality assurance processes.
Technical peer exchange *[*proposed for 2026]*	Annual grant agent webinar convened by GPE Secretariat on PSEAH for lesson learning and country good practice**.**

At the country level:

Policy dialogue, partnership compact development and midterm reviews *[*midterm review new in 2026]*	Stakeholders involved in country level education policy dialogue inform reform prioritization in the partnership compact and midterm reviews. These are key entry points to consider contextual risks and capacities for partner country government leadership and coordination with other development partners to address GBV within education systems and mitigate risks in GPE grant implementation.
Annual monitoring report *[*updated in 2026]*	This annual report on partnership compact progress completed by partner country governments prompts consideration of strengthened partnership coordination and leadership to prevent and respond to GBV in the education system and SEAH risks relating to ongoing grant implementation.

At the grant level:

Accreditation of grant agents	Prior to accreditation, grant agents are required to complete a comprehensive institutional capacity assessment. This includes assessment of safeguarding policies, whistleblowing and complaints, human resources aspects of PSEAH, risk management protocols and governance and accountability. Grant agents have either met the GPE SEAH good practice guidelines or agreed to an action plan to improve the policies and processes. › **Country selection of grant agents:** Grant agent selection at country level is led by the government and coordinating agency, advised by the local education group with an independent review conducted for grants above US$5 million. Grant agents' capacity is considered against GPE minimum standards on PSEAH. (see Selection process for grant agents, annex 2.) › **Quality assurance of program design** *[*updated in 2025]*: All grants are channeled through a GPE Secretariat quality assurance process before Board approval. PSEAH quality standards include whether SEAH risk has been considered in program design, provision of a risk rating and appropriate mitigation measures given. Gender and inclusion standards are also assessed, reviewing how grant agents have mitigated activities that may involve higher risk of GBV. › **Annual progress and completion reports** *[*new in 2026]*: Annual progress and completion reports (from grant agents) will include requests for detail on whether there have been any changes to risk ratings and adaptations; lessons learned based on SEAH incident reporting; and opportunities for enhanced policy dialogue with national or local governments to mitigate further risks.
SEAH incident reporting *[*new in 2026]*	Grant agents are responsible for using their policies and processes to respond to reports, mitigate risks, conduct investigations and provide victim assistance. The new case reporting protocol provides clarity on when and how grant agents submit reports to the GPE Secretariat. The GPE SEAH incident reporting channel allows cases that involve individuals and where notable SEAH reporting system weaknesses have been recorded. Aggregated case reporting data is collated by the Secretariat and fed into the biannual Board report.

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