2024

Prevention Against Sexual Abuse & Exploitation Policy

VERSION 1.0

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PURPOSE OF THIS POLICY

Development and humanitarian actors have a mandate to provide assistance and protect people in some of the world's most challenging political, social, economic, and technological environments. PUNSAA recognizes the unique position it is in within the society in Somalia and the role it can play in ensuring that humanitarian aid and development sector workers uphold the highest standards of personal and professional conduct at all times to protect beneficiaries of assistance and uphold the trust placed upon them. Sexual Exploitation and Abuse (SEA) by development sector workers including those at PUNSAA directly contradicts the principles upon which assistance and protection interventions are based and represents a protection failure on the part of the aid community. SEA inflicts harm on those whom the humanitarian community is obligated to protect, as well as jeopardizes the credibility of all assistance agencies.

PUNSAA is fully committed to ending Sexual Exploitation and Abuse (SEA) against any member of society and acknowledge that we have a duty to promote the gender responsive safeguarding of women, men, and children and particularly those with whom we work or are in contact. All PUNSAA employees and associated personnel are therefore required to behave irreproachably with the project beneficiaries or members of the community, using particular care with the most vulnerable classes: minors, women, the elderly, those from minority clans etc.

PUNSAA has zero-tolerance for sexual exploitation and abuse and is strongly against complacency and impunity. PUNSAA Management with the support of other leadership structures, and indeed everyone at PUNSAA is expected to create and maintain an environment that prevents sexual exploitation and abuse. PUNSAA management must be familiar with and enforce this policy, being proactive in overseeing their team.

Through the Protection from Sexual Exploitation and Abuse Policy, PUNSAA clearly expresses its determination to prevent and combat sexual exploitation and abuse of beneficiaries and members of the community by all PUNSAA employees and associated personnel and sets the minimum standards and requirements to effect the same. PUNSAA PSEA policy sets minimum standards to be followed to protect beneficiaries and members of the community from sexual exploitation and abuse.

POLICY APPLICATION

The policy principally applies to all PUNSAA employees and Associated Personnel included in the following categories:

- Board of Directors and PUNSAA Management.
- All the employees at PUNSAA.
- All employees and associated personnel of non PUNSAA entities that have contracts, memoranda of understanding or are in partnership, sub-grant or sub-recipients' agreement with PUNSAA including community-based structures and associations of any sort – including their members and staff – supported, financially or otherwise, by PUNSAA.
- Consultants and other freelance persons who act on behalf of PUNSAA on the basis of service contracts (understood as consultants and providers of intellectual services).
- All persons acting voluntarily on behalf of PUNSAA
- Suppliers of any sort of goods, services, or works, including current and potential suppliers.

- All the other people not included in the above-mentioned categories who have signed a contract with PUNSAA.

The principles set forth in this policy apply and are binding at all times, during and outside office hours and during the periods of leave, with no exceptions.

POLICY STATEMENT

Sexual Exploitation and Abuse is a violation of PUNSAA Code of Conduct. PUNSAA does not tolerate any form of sexual exploitation and abuse, as well as bullying and a range of non-sexual abuse of power perpetrated by PUNSAA employees and associated personnel against any individual regardless of age, gender, sexuality, disability, religion or ethnic origin.

PUNSAA acknowledges fully its duty to safeguard and promote the welfare of all, and ensure all our safeguarding measures are embedded, accessible and communicated clearly to staff, partners, women, men and children and their communities, in their native language.

PUNSAA will take all reasonable steps to make itself safe, both as an organization and in the conduct of all aspects of its day-to-day operations of emergency, humanitarian, development, policy and advocacy work.

PUNSAA commits to do all that is necessary to prevent programs from having any negative effects such as SEA by PUNSAA employees and associated personnel against beneficiaries and members of the community.

PUNSAA takes seriously all the complaints and concerns about sexual exploitation and abuse and will initiate rigorous investigation of complaints or allegations that indicate a possible violation of this policy, PUNSAA Code of Conduct and related policies.

APPLICABLE PRINCIPLES AND REQUIREMENTS

This Protection from Sexual Exploitation and Abuse Policy is informed by the following set of principles and requirements that guide its implementation:

1. CHILDREN PROTECTION: Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense and in no way shall ignorance of the age of the person be accepted as a justification. A specific Child Safeguarding Policy further sets the principles and the operationalizing procedures and guidelines for guaranteeing children safeguarding in all domains of PUNSAA action.
2. Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited. This includes exchange of assistance that is due to beneficiaries.
3. WORK PLACE SEXUAL RELATIONSHIPS: Sexual relationships between PUNSAA staff and

beneficiaries or vulnerable members of the community are strongly discouraged since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of development sector work.

4. REPORTING ABUSE: Where PUNSAA employee or associated personnel develops concerns or suspicions regarding sexual abuse by a fellow worker, whether the individual works for PUNSAA or for other organization, partners, suppliers or other related stakeholders, he or she must report such concerns through the means and tools available within the organization.

5. The Safeguarding and Complaints Committee (SCC) must be informed about all the concerns and suspicions, including rumors in good faith arisen about sexual exploitation and abuse.

6. RESPONSIBILITY**:** All PUNSAA staff members, whatever their levels are obliged to create and maintain an environment that prevent sexual exploitation and abuse and promotes the implementation of PUNSAA Code of Conduct.

7. RECRUITMENT: Managers and Human Resource team must ensure robust screening and recruitment process for all the personnel, particularly for persons who will have any direct contact with children.

8. ONBOARDING & ORIENTATION: The SHEA and Safeguarding Focal Point and HR will ensure all joining staff and other representatives have an induction on PUNSAA's SHEA and Safeguarding approach and this policy no later than one month after they have been appointed. It is the responsibility of the individual's Line Manager to ensure that this briefing is carried out. Depending on the nature of the role, more extensive inductions on SHEA and Safeguarding approach should be carried out.

9. PUNSAA Code of Conduct establishes, at a minimum, the obligation that all staff and associated personnel do not exploit, abuse or otherwise discriminate against people. Every effort must be made to ensure that it is duly known by all and sundry.

10. SAFER PROGRAMING: PUNSAA recognizes that PSEA must be integral to its development work. We must recognize that rights holders and communities, including adults at risk can be harmed as a result of poorly designed programs and projects, and related activities. Staff members responsible for program or project design and implementation must ensure that SHEA and Safeguarding is accounted for at all stages of the program/project cycle.

11. PUNSAA is responsible to engage the support of communities and governments to prevent and respond to sexual exploitation and abuse. Local communities shall be involved in developing and or organizing project activities to ensure they cause no harm to the beneficiaries and the community.

12. FEEDBACK AND COMPLAINT MECHANISM (FCM): An FCM for reporting sexual exploitation, abuse is in place and accessible. FCM should not be a separate, parallel system to other complaints and feedback structures in a given area, but rather link to and build on existing structures to create one system for handling feedback and complaints.

13. PUNSAA staff and associated personnel are completely aware of the applicable principles,

requirements and minimum implementation standards contained in this policy and related documents including PUNSAA Code of Conduct.

COMMITMENTS

PUNSAA commits to do all that is within its power to prevent and respond to potential or actual incidents of Sexual Exploitation and Abuse by its staff or associated personnel in a timely and systematic manner. In order to do so:

1. PUNSAA undertakes to set protocols to process complaints of sexual exploitation and abuse in a timely manner, including the immediate suspension of the alleged perpetrator from all the activities with a direct impact on beneficiaries and communities until the investigation is ended.
2. PUNSAA undertakes to set protocols to properly inform the appropriate authority which is responsible for conducting investigations of sexual exploitation and abuse allegations in respect of national and foreign legislation.
3. PUNSAA undertakes that beneficiaries and members of the community shall be made aware of whom or to whom they should report and suspected incidents of sexual exploitation and abuse and what sort of response they can expect to receive.
4. Complainants and survivors have the right to receive feedback on the development and outcome of their case, and the PSEA Focal Point will make every effort to maintain lines of communication.
5. PUNSAA undertakes to take appropriate disciplinary actions including immediate termination of employment and referral for criminal prosecution and legal action, where appropriate, against the person who committed sexual exploitation and abuse, in accordance with the national law, reporting and responding system.
6. PUNSAA undertakes to ensure the protection of the victim, the complainant, and the whistle-blower of SEA while in the process of or after having verified and confirmed the reports as factual either by internal investigation or by external investigation.
7. PUNSAA undertakes to provide case management services, psychosocial counselling, medical treatment, legal assistance and any other service as may be needed to any victim of sexual exploitation and abuse perpetrated by one of its staff members or associated personnel prior to or in lieu of an investigation.
8. PUNSAA undertakes to be responsible for ensuring that all third parties including partners and suppliers are committed to respect the principles included in this PSEA Policy, in addition to those in PUNSAA Code of Conduct.
9. The acceptance to be bound by this PSEA Policy is by appending a signature or thumbprint of Safeguarding Commitment Form/Safeguarding Commitment Form for Contractors. Such acceptance shall be a condition for undertaking any relation with PUNSAA and shall be incorporated into contracts, MOUs and partnership agreements entered into between PUNSAA and other party.

ROLES AND RESPONSIBILITIES

1. All Staff and Associated Personnel shall:

   a) comply with this Protection from Sexual Exploitation and Abuse Policy and PUNSAA Code of Conduct that sets minimum implementation standards.

   b) be aware of and adhere to the provisions of this Protection from Sexual Exploitation and Abuse Policy, the Safeguarding Case Handling Framework at PUNSAA and related policies.

   c) commit to comply with the provisions by signing the Safeguarding Commitment Statement or Safeguarding Commitment Statement for Contractors as may be appropriate.

   d) commit and contribute to an environment where everyone regardless of age and gender and any other characteristic feel respected, supported, safe and protected.

   e) never act or behave in a manner that results in sexual exploitation and abuse against a child, young person, woman or man or places them at risk of the same.

   f) report and respond to safeguarding concerns and breaches of the policy in line with the applicable procedures of Puntland Non-State Actors Association outlined in the Code of Conduct, Whistle Blowing policy and other such policies, standard operating procedures and guidelines.

2. All staff and associated personnel MUST NEVER:

   a) Sexually exploit or abuse anyone we come into contact with through our work, this policy addresses harms carried out towards rights holders and community members, including adults at-risk in particular.

   b) Engage in any sexual activity with rights holders or adults at-risk

   c) Engage in any sexual activity with children.

   d) Engage in any kind of exploitative or harmful behavior towards members of a community that PUNSAA works with or near to.

   e) Raise malicious complaints or use the policy for purposes other than what it is intended for.

3. Managers shall ensure that:

   a) Women, Men and Children and communities with which we engage, work or are in contact are made aware of the provisions of this Protection from Sexual Exploitation and Abuse Policy and to ensure they have the confidence and ability to report any incidents occurring;

   b) Staff and Associated Personnel are aware of the standards that are applicable to their role or engagement with PUNSAA.

   c) they support and develop systems which maintain an environment which is safe for and prevents sexual exploitation and abuse; and

   d) they are accountable for ensuring that the policy is fully embedded within their areas of responsibility in accordance with the Code of Conduct.

4. Directors shall ensure that:

   a) the relevant PUNSAA Entity has in place procedures that are consistent with this Protection from Sexual Exploitation and Abuse Policy, the Code of Conduct, Safeguarding Case Handling Framework and related policies which outline the reporting requirements and the manner in which they are escalated within each PUNSAA Entity.

   b) the policy and applicable procedures are communicated in the local language and child-friendly formats with due regard for cultural sensitivity.

   c) that beneficiaries and members of the community are made aware of whom or to whom they should report actual or suspected violations and what sort of response they can expect to receive.

   All potential and actual survivors of SEA must be fully informed about how the complaint mechanism works, including the reporting process by various means including PUNSAA website and social media pages and handles, in posters and stickers at project sites and through community engagement activities such as community sensitization campaigns, Community dialogues etc.

5. Organizations that work with us in carrying out programs, projects, processes, events and/or activities must comply with the Safeguarding Guidelines in place.

6. SHEA and Safeguarding Focal Points must always:

   a) Work with others to create a safe environment where staff and others feel able to raise concerns without fear of retribution.

   b) Ensure that this policy is displayed at prominent places within the office, as well as online, and to make it accessible to all members of staff.

   c) Ensure that all inductions include a discussion of this policy.

   d) Deliver training to all staff on this policy and other policies that fall within the SHEA and other Safeguarding concerns remit.

   e) Work with others to ensure that the values, commitments, and procedures set forth in this policy are embedded throughout all PUNSAA's programs and activities, and those of our partners.

   f) Ensure that they raise all concerns and complaints relating to SHEA and Safeguarding to the Global SHEA and Safeguarding Team.

   g) Work with the SHEA and Safeguarding Stakeholder Panel to address concerns relating to sexual exploitation and abuse, and ensure incident management is carried out in line with PUNSAA's SHEA and Safeguarding approach.

   h) Set a positive example both on and off duty.

7. Human Resources must always;

   a) Work with others to create a safe environment where staff and others feel able to raise concerns

without fear of retribution.

b) Work with the SHEA and Safeguarding Focal Point to ensure that this policy is displayed at prominent places within the office, as well as online, and to make it accessible to all members of staff.

c) Work with the SHEA and Safeguarding Focal Point to ensure that all inductions include a discussion of this policy.

d) Ensure that the values, commitments, and procedures set forth in this policy are embedded throughout the employee life cycle (including safer recruitment, performance management, and exit).

e) Work with the SHEA and Safeguarding Stakeholder Panel to address any concerns relating to abuse or exploitation of rights holders and communities, including adults at-risk by providing strong employment law and employee relations advice, and ensuring that all relevant PUNSAA policies and processes are followed correctly throughout the incident management process.

f) Set a positive example both on and off duty.

SANCTIONS

Breach of this policy will be investigated in accordance with sensitive investigation procedures and guidelines and the following sanctions imposed in adherence with disciplinary procedures and contractual agreements:

1. Sexual exploitation and abuse by PUNSAA employee and Associated personnel constitute acts of gross misconduct and are therefore grounds for disciplinary actions and/or termination of employment contract within the applicable and current regulations.
2. When appropriate and with the consent of the victim/survivor, PUNSAA may report to statutory authorities for criminal investigation under the law in Puntland and the Federal Republic of Somalia for criminal prosecution and legal action in accordance with the applicable law.
3. If a legitimate concern about the suspected sexual exploitation and abuse is raised but proves to be unfounded on investigation, no action will be taken against the reporter. However, appropriate sanctions will be applied in cases of false and malicious accusations.

COMPLIANCE MONITORING

All PUNSAA Entities shall monitor compliance with this Protection from Sexual Exploitation and Abuse Policy through regular review. Auditing against the standards will be led by the PSEA Focal Point in collaboration with the PUNSAA management, PUNSAA HR and M&E Department. The Safeguarding and Complaints Committee (SCC) shall have the overall supervisory role in ensuring implementation of this policy.

REPORTING PROCEDURES

As part of embedding SHEA and Safeguarding into all PUNSAA program design and activities, the following

complaints mechanisms are established in order to ensure that rights holders and community members, including adults at-risk are able to raise concerns. Staff should work in a participatory way with rights holders and communities (e.g. local committees) to create, strengthen, and evaluate existing complaints mechanisms in line with best practice, and ensure that the mechanisms used are relevant to the local context, translated into local languages, and made publicly available (e.g. published on the website).

As part of our commitment to accountability, staff must ensure that policies and procedures are shared with rights holders and community members, including adults at-risk so they can provide feedback and be instrumental in developing our approach. The SHEA and Safeguarding Focal Point will work with relevant teams to ensure that complaints mechanisms are accessible, inclusive, survivor-centered, and relevant to the local context (e.g. to ensure that people with disabilities are able to access complaints mechanisms and report concerns). Because it is critical that complaints mechanisms provide a variety of ways of reporting, recognizing that many people prefer to disclose allegations of abuse or exploitation to someone they trust, and that people are assured of confidentiality, PUNSAA has established the following multiple reporting mechanisms;

PUNSAA PSEA Focal Point	
Community Focal Point	
PUNSAA Complaints Hotline	
PUNSAA Complaints Dedicated Email Address	
Community Focal Point Contact	

CONFIDENTIALITY

Confidentiality is vitally important to SHEA and Safeguarding. We are committed to working with survivors/complainants and all others involved in an incident management process in a confidential and respectful manner. Breaches of confidentiality undermine confidence and trust in PUNSAA's Safeguarding and complaints management processes and in the organization itself. Maintaining confidentiality around people's personal data and information is particularly important when managing issues relating to sexual harassment, exploitation and abuse.

From the point of disclosure to the final outcome of any investigation, every effort will be made to maintain and promote confidentiality in order to protect the safety and privacy of everyone involved. Information must be shared on a 'Need to Know' basis – that is, only those who need to be informed so they can support an investigation or because they hold overall accountability will be given information, and they will receive only as much information as they need in order to be effective.

If information is shared confidentially which relates to a child or suggests that someone's life is in danger, then action will need to be taken outside of standard confidentiality procedures in order to ensure that everyone is safe. This will be managed on a case by case basis, and the safety and wellbeing of the child or adult in question is always paramount. As noted above, only those who need to know will be informed so they can take effective action.

TERMS AND DEFINITIONS

When used in this document:

Associated personnel: refers to a range of contracted paid and non-paid individuals who have committed to work with or support a PUNSAA Entity. It includes, among others, board members, volunteers (including community volunteers), interns, sponsors, researchers, donors, international and local consultants, in addition to individual and corporate contractors of these entities and related personnel. This includes non-PUNSAA entities and their employees and individuals who have entered into partnership, sub-grant or sub-recipient agreements with PUNSAA their staff and/or representatives of partner organizations and local governments (when operating in partnership agreement with Puntland Non-State Actors Association).

Beneficiaries (of Humanitarian Assistance): A person who receives assistance as part of either emergency relief or development aid through assistance programs. Persons under this title include members of affected populations including refugees, internally displaced persons, and other vulnerable individuals, as well as host community members. Sexual exploitation or abuse of a beneficiary is SEA; however, the individual need not be in a vulnerable position; a differential power or trust relationship is sufficient to establish SEA.

Child: in line with the United Nations Convention on the Rights of the Child and for the purposes of this PSEA policy, is defined as any person – girl, boy, young woman, young man, and children of other gender identities - under the age of 18 years (UNCRC Article 1).

Complainant: a person who brings an allegation of SEA to the Safeguarding Focal Point or other members of the organization in accordance with established procedures. This person may be a SEA survivor or another person who is aware of the wrongdoing. Both the survivor and the complainant, if different from the survivor, should be protected from retaliation for reporting SEA. Where there is any conflict of interest between the survivor and another interested party, the survivor's wishes must be the principle consideration in case handling, particularly when there is a risk of additional physical and/or emotional harm.

Code of Conduct: A set of standards of behavior that staff of an organization are obliged to adhere to.

Director(s): is the Executive Director and members of Board of Directors at Puntland Non-State Actors Association.

Manager: refers to a Staff member who has responsibility for line managing or supervising the work of Staff or Associated Personnel**.**

Harm: is any detrimental effect on a person's physical, psychological, or emotional wellbeing. Harm may be caused by abuse or exploitation whether intended or unintended.

Humanitarian Aid Worker: all persons involved in providing protection and/or assistance to affected populations and who have a contractual relationship with the participating organization/partners, including incentive workers from target communities. It refers to all staff of humanitarian agencies and organizations, including UN agencies, INGOs, NGOs, funding partners, including paid staff, volunteers,

contractors, incentive workers, and anyone performing a task on behalf of any humanitarian agency or organization, regardless of the type or duration of their contract.

Sexual Exploitation and Abuse (SEA): Particular forms of gender-based violence that have been reported in humanitarian contexts, specifically alleged against humanitarian workers.

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 Harassment versus SEA: SEA occurs against a beneficiary or member of the community. Sexual harassment occurs between personnel/staff and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature. Sexual harassment is not covered by SEA

Staff: refers to individuals who receive a regular salary for work in any PUNSAA Entity

Survivor: A person who has SEA perpetrated against him/her or an attempt to perpetrate SEA against him/her. For the purposes of this policy, persons who report SEA committed against themselves are treated as survivors for the purposes of security and needs assessments

PUNSAA refers to Puntland Non-State Actors Association, including when operating through one of its subsidiaries. It generally includes headquarters, branch offices and PUNSAA operated/supported Schools.

Whistle blower: For the purposes of PSEA Policy a whistle-blower is a type of complainant, not the survivor, who is a humanitarian aid worker either as staff or associated personnel making a report of SEA. PUNSAA whistleblowing policy encourages staff and associated personnel to report concerns or suspicions of misconduct by colleagues by offering protection from retaliation for reporting and clarify the rules and procedures for reporting and addressing such cases. The DO NO HARM principles apply to whistleblowers as they would to any complainant, and our internal organizational policies shall protect whistleblowers on SEA from retaliation, so long as the report is made in good faith and in compliance with our policies

PUNSAA ENDORSEMENT OF THE POLICY, PROCEDURES AND GUIDELINES.

The PUNSAA Board of Directors herein represented by the Executive Director and BoD Chairperson hereby adopt this policy as binding to PUNSAA BoD, PUNSAA management, all PUNSAA staff members and associated personnel, PUNSAA partners, PUNSAA Visitors, Vendors of goods and services to PUNSAA and any other entities with dealings with PUNSAA subject to contractual agreements.

Abdirahman Abdirisak Abdirahman

PUNSAA Chairperson

Signature: _____

Date:

Dahir Hussein

PUNSAA Executive Director

Signature: _____

Date:

ANNEXES

REFERRAL FORM

***CONFIDENTIAL**: Please restrict access to this document & stored safely. **Note:** Please share copies of filled out referral forms with the survivor and receiving agency and keep a copy for the organization's internal records and follow-up.*

Referral from (*Referring officer details)*			
Name:		Position/Title:	
Agency/org:	Puntland Non-State Actors Association	Phone:	
Email:		Location:	
Referral to *(Receiving officer details)*			
Name:		Position/Title:	
Agency/org:		Phone:	
Email:		Location:	
Survivor information			
Name:		Phone:	
Address:		Age:	
Sex		Nationality:	
Language:		ID number	
If survivor is a minor (under 18)			
Name of primary caregiver:		Relationship to child:	
Contact information for caregiver:		Is child separated or unaccompanied? ☐ Yes ☐ No	
Caregiver is informed about Referral? ☐ Yes ☐ No (If no, explain)			
Background Information/Reason for referral and services already provided			
Has the survivor been informed of the referral? ☐ Yes ☐ No (If no, explain below)		Has the survivor been referred to any other organization? ☐ Yes ☐ No (If yes, explain below)	

Services requested		
☐ Mental Health Services	☐ Protection Services	☐ Shelter
☐ Psychosocial Support	☐ Legal Assistance	☐ Material Assistance
☐ Social Services	☐ Education	☐ Nutrition
☐ Medical Care	☐ Livelihood Support	☐ Support for children born as a result of SEA
Please explain any requested services:		

Consent to release information. (Read with survivor/ caregiver and answer any questions before s/he signs below. Sign on behalf of survivor/caregiver if consent is given verbally and survivor/caregiver cannot sign.)
I, _____**(*survivor name*),** understand that the purpose of the referral and of disclosing this information to _____(***name of receiving agency***) is to ensure the safety and continuity of care among service providers seeking to serve the client. The service provider, **Puntland Non-State Actors Association** has clearly explained the procedure of the referral to me and has listed the exact information that is to be disclosed. By signing this form, I authorize this exchange of information.
Signature of responsible party (survivor or caregiver if a child):
Date (DD/MM/YY):

Details of Referral
Any contact or other restrictions? ☐ Yes ☐ No (If yes, please explain below)
Referral delivered via: ☐ Phone (emergency only) ☐ E-mail ☐ Electronically (e.g., Primero, App, or database) ☐ In Person
Follow-up expected via: ☐ Phone ☐ E-mail ☐ In Person. By date (DD/MM/YY):
Information agencies agree to exchange in follow up:

Name and signature of recipient: Date received (DD/MM/YY):

_____

INCIDENT REPORT FORM FOR SEA ALLEGATIONS

CONFIDENTIAL: Please restrict access to this document and keep it stored safely (e.g. using passwords or encryptions for computers and locking offices when unattended). Always use code names when referring to individuals involved in the case, omit information that could reveal identities (e.g. date of birth, address, phone number, description of unique physical traits) and keep information on the identity and personal details of persons involved separate from incident and related reports.

ADMINISTRATIVE DETAILS			
Report Date*	**Incident Date***	**Receiving Staff Code***	**Report by Survivor*?** ☐ Yes ☐ No

DETAILS OF PERSON REPORTING **(Only fill if report is not by survivor)**			
Name:		**Title:**	
Phone:		**Email:**	
Location		**Report Date:**	

DETAILS OF THE INCIDENT

Description of the Incident (summarize in the words of person reporting)

Incident Zone* ☐ **Puntland (**Regions and Districts below**)** ☐ **South Cental** ☐ **Somaliland** ☐ **Other**

Region*	☐ **Bari**	☐ **Mudug**	☐ **Nugaal**	☐ **Other**
District*	☐ Bandarbayla ☐ Bossaso ☐ Caluula ☐ Iskushuban ☐ Qandala ☐ Qardho	☐ Galkayo ☐ Galdogob ☐ Hobyo ☐ Jariban ☐ Xarardheere	☐ Burtinle ☐ Eyl ☐ Garowe	☐ Unknown
		Incident location/Where the incident took place*:		

Time of day that the incident took place*:	☐ Workplace ☐ Client's home ☐ Alleged Perpetrator's home ☐ Abandoned house ☐ Army Barracks ☐ Bush ☐ Border ☐ Check Point ☐ Chewing Sites ☐ Detention Centre/ Prison ☐ Farm/ Open Field ☐ Front lines/battle zones ☐ Hospital/ Health Centre ☐ Hotel, Motel, Guest House ☐ IDP Settlement	☐ Latrine ☐ Madrassa ☐ Market/ Kiosk ☐ Police Station ☐ Refugee settlement ☐ Registration/Distribution site ☐ Road/Street ☐ School ☐ Vehicle (Taxi, Bus, Tuktuk, Truck etc.) ☐ Water Point ☐ Other ☐ Unknown
☐ Morning (sunrise to noon) ☐ Afternoon (noon to sunset) ☐ Evening/night (sunset to sunrise) ☐ Unknown/Not applicable		

SURVIVOR INFORMATION				
Survivor's Age*	**Sex of Survivor*** ☐ Female ☐ Male	**Client's Country of Origin*❍?** ☐ Somalia ☐ Somaliland ☐ Ethiopia ☐ Kenya ☐ Uganda ☐ Yemen ☐ Tanzania ☐ Other (Specify):	**Specific Needs / Vulnerabilities*** (check only one option in each box)	
Marital Status ☐ Single ☐ Married/cohabitation ☐ Divorced/Separated ☐ Widow			**Disability?** ☐ No ☐ Physical Disability ☐ Mental Disability ☐ Mental & Physical Disability	**UASC?** ☐ Unaccompanied Minor ☐ Separated Child ☐ Other Vulnerable Child
Displacement status at time of report* ☐ Refugee ☐ Asylum Seeker ☐ Foreign National ☐ Stateless Person ☐ Returnee ☐ Resident ☐ IDP ☐ N/A				

ALLEGED PERPETRATOR INFORMATION		
Alleged perpetrator sex* ☐ Male ☐ Both ☐ Female	**Alleged perpetrator relationship with survivor *** ☐ Intimate partner / Former partner ☐ Primary caregiver/ Parent ☐ Family other than spouse or caregiver ☐ Supervisor / Employer ☐ Teacher / School official ☐ Service Provider ☐ Landlord ☐ Cotenant / Housemate	☐ Schoolmate ☐ Family Friend / Neighbour ☐ Other refugee / IDP / returnee ☐ Other resident community member ☐ Other ☐ No relation ☐ Unknown
Age Group* ☐ 0-11 ☐ 41-60 ☐ 12-17 ☐ 61 & older ☐ 18-25 ☐ Unknown ☐ 26-40		
Nationality of alleged perpetrator' *❍ ☐ Somali ☐ Yemeni ☐ Ethiopian ☐ Kenyan ☐ Ugandan ☐ Tanzanian ☐ Eritrean ☐ Djiboutian ☐ Other (Specify):		
Main occupation of alleged perpetrator *❍		

☐ Armed State actors (AMISOM, END, KDF, SNA, NISA) ☐ Armed non-State actors/rebels/militia ☐ Civil servant ☐ Community Leader ☐ Driver ☐ Farmer/pastoralist ☐ Fisherman	☐ Gatekeeper ☐ Guard ☐ Hotel/motel/guest house staff ☐ INGO / NGO Staff ☐ Labourer ☐ Police ☐ Religious leader ☐ Service provider	☐ Shopkeeper ☐ Teacher ☐ Trader/Business owner ☐ UN Staff ☐ Unemployed ☐ PUNSAA Staff ☐ Other ☐ Unknown

PLANNED ACTION / ACTION TAKEN:

Any action / activity regarding this report

Who referred this client to you? *

☐ Self-Referred	☐ Livelihood Program	☐ Other Humanitarian / Development Actor
☐ Health/Medical Services	☐ Safe House/Shelter	☐ Other Government Service
☐ Psychosocial/Counselling Services	☐ Teacher/School Official	☐ Other (specify)
☐ Police/Other Security Actor	☐ Community or Camp Leader	
☐ Legal Services		

Was client referred to a safe house/ shelter? * ☐ Yes ☐ No - Service provided by you ☐ No - Service received prior to this visit ☐ No - Service not applicable ☐ No - Referral declined by survivor ☐ No - Service unavailable	**Referral Details/Date of Future Appointment/Name & Location:**
Was client referred to medical services? * ☐ Yes ☐ No - Service provided by you ☐ No - Service received prior to this visit ☐ No - Service not applicable ☐ No - Referral declined by survivor ☐ No - Service unavailable	**Referral Details/Date of Future Appointment/Name & Location:**
Was client referred to psychosocial services? * ☐ Yes ☐ No - Service provided by you ☐ No - Service received prior to this visit ☐ No - Service not applicable ☐ No - Referral declined by survivor ☐ No - Service unavailable	**Referral Details/Date of Future Appointment/Name & Location:**
Was client referred to a security/police services? * ☐ Yes ☐ No - Service provided by you ☐ No - Service received prior to this visit ☐ No - Service not applicable ☐ No - Referral declined by survivor ☐ No - Service unavailable	**Referral Details/Date of Future Appointment/Name & Location:**
Was client referred to a livelihood programme? * ☐ Yes ☐ No - Service provided by you ☐ No - Service received prior to this visit ☐ No - Service not applicable ☐ No - Referral declined by survivor ☐ No - Service unavailable	**Referral Details/Date of Future Appointment/Name & Location:**
Was client referred to a legal aid? * ☐ Yes ☐ No - Service provided by you ☐ No - Service received prior to this visit ☐ No - Service not applicable	**Referral Details/Date of Future Appointment/Name & Location:**

☐ No - Referral declined by survivor ☐ No - Service unavailable	

Services requested		
☐ Mental Health Services	☐ Protection Services	☐ Shelter
☐ Psychosocial Support	☐ Legal Assistance	☐ Material Assistance
☐ Social Services	☐ Education	☐ Nutrition
☐ Medical Care	☐ Livelihood Support	☐ Support for children born as a result of SEA
Please explain any requested services:		

Report transmitted by:	
Name:	Contact info (email, phone):
Title:	Date: