



MOPAN PERFORMANCE INSIGHTS

**Protection from Sexual Exploitation,
Abuse and Harassment (PSEAH) in
International Financial Institutions:
Progress, Gaps and the Road Ahead**
BRIEF



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About this study

Protecting people from sexual exploitation, abuse and harassment (SEAH) is fundamental to the legitimacy and effectiveness of every organisation working with vulnerable populations. SEAH causes profound and enduring harm, erodes trust in institutions and undermines programme and investment outcomes. Over the last decades, the potential ethical, operational, and reputational consequences of SEAH have become increasingly visible across humanitarian, development and peace operations. PSEAH has become a strategic issue. It is recognised as a necessity for sustainable, inclusive development and **a foundational requirement for organisational legitimacy**.

This imperative has sharpened further as global instability rises, the funding environment tightens, and investors seek to minimise risks. The upward trajectory of multilateral ODA has reversed since 2024: the OECD projected a 9% decline in net ODA for 2024 and a further drop of 9–17% in 2025.¹ MOPAN's recent mapping of multilateral organisations' response to the current funding environment highlights that ODA contributions to International Financial Institutions (IFI) concessional windows have been flat for more than a decade.² This funding context is clearly affecting PSEAH efforts in the United Nations (UN) system and is likely to challenge PSEAH efforts in IFIs as well. And yet recent scandals involving organisations have shown that SEAH poses considerable risks to institutional credibility, legitimacy and reputation.

This study looks at PSEAH practice in IFIs, documenting progress and gaps and providing reflections and recommendations for the way forward. Drawing on evidence from seven MOPAN-assessed IFIs (ADB, AfDB, EBRD, IDB, IFAD, IFC, and the World Bank), it finds that they have made clear progress since their first joint commitment to PSEAH in 2018. They focus more strongly on PSEAH in response to reputational risk and the expectations of shareholders. Most have updated their environment and social (E&S) frameworks, expanded guidance on gender-based violence (GBV) and SEAH in their operations, and strengthened reporting, ethics and misconduct management systems. The progress remains uneven, however, and efforts are fragmented. Moreover, because IFIs do not yet speak with one voice on PSEAH, their ability to leverage collective influence with governments, the private-sector, industry bodies, investors and implementing partners is limited.

1 OECD (2025), "Cuts in official development assistance: OECD projections for 2025 and the near term", OECD Policy Briefs, Vol. No. 26, <https://doi.org/10.1787/8c530629-en>

2 MOPAN (2025c), Mapping of Multilateral Organisations' Response to the Current Funding Environment, Multilateral Effectiveness in a Shifting Landscape, Paris.

Progress to date: Achievements with uneven traction

IFIs have made meaningful progress in protecting from SEAH in several areas.

They have strengthened their policy architecture and are embedding PSEAH in a maturing, risk-based approach. Most IFIs have integrated PSEAH into their operational policies and systems, most clearly through E&S frameworks. The broader E&S architecture — risk screening, project design, due diligence and supervision — provides a consistent foundation for PSEAH as it integrates SEAH considerations into established operational systems. That said, PSEAH is embedded in E&S frameworks with variable depth and enforceability. IFAD is the only IFI with a dedicated, institution-wide PSEAH policy. The policy has since been updated and will soon be submitted to the board for consideration and approval. It embeds PSEAH in E&S standards, codes of conduct, and gender strategies. Other IFIs rely only on these instruments, using each to cover just a part of their work. Still others, such as the IFC and the World Bank, rely on guidance based on good practice rather than making explicit E&S prohibitions.³

PSEAH guidance and operational tools for PSEAH are gradually converging. IFIs have developed a growing body of technical guidance and notes on good practice that help translate policy ambitions into operational action. New guidance across sectors including major civil works, agribusiness, transport, as well as human development, provides project implementation units and clients with clearer expectations for prevention, mitigation and response. IFIs are increasingly co-developing guidance. This expanding toolbox has improved operational consistency and supports staff in applying SEAH considerations more systematically across diverse project contexts.

Co-operation among IFIs is expanding at both normative and operational levels as the interpretation of SEAH-related requirements converges gradually. Led in part by the MFI SEAH Working Group, institutions are relying increasingly on shared standards and joint guidance, driving greater alignment and clearer expectations for clients and staff. Operational co-operation on PSEAH is also taking shape. Such early steps towards mutual reliance arrangements in co-financed projects makes it possible for IFIs to draw on one another's assessments or procedures. While these efforts remain limited, they do reduce duplication, support more coherent supervision, and highlight the value of further harmonising standards to strengthen collective influence and reduce the fragmentation of PSEAH expectations across jointly financed operations.

Challenges and recommendations

The study highlights the strategic and operational challenges. Together, they point to a need for clearer institutional vision, stronger resourcing, and more consistent accountability in applying the PSEAH principles.

Based on these findings, a set of recommendations is proposed to strengthen future IFI efforts on PSEAH. These recommendations are directed at IFI leadership and senior management, as well as board members, shareholders, and donors. They identify future directions that — if strategically elevated and adequately resourced — could significantly strengthen system-wide PSEAH performance. As the global financial situation heightens SEAH vulnerability among communities served, collective engagement across governance and management structures is essential to renew institutional commitment and financial investment.

³ IFC is undertaking a comprehensive overhaul of its E&S framework, expected to be completed in 2027. It is anticipated to include explicit provisions and enhanced clarity on PSEAH.

Strategic and systemic challenges and recommendations

Challenge 1: IFIs do not speak with one voice on PSEAH and GBV and thus fail to raise the bar sufficiently

Global PSEAH benchmarks and expectations have advanced since the 2018 joint IFI commitment, especially with the Common Approach to Protection from Sexual Exploitation, Sexual Abuse and Sexual Harassment (CAPSEAH). However, IFIs have not updated their collective pledge. While the original commitment spurred substantial guidance, tools and good-practice notes, most of these remain voluntary and practice varies widely. As a result, partner countries and clients face different requirements. IFIs run into obstacles to cooperating in operations, which limits their ability to influence national systems. Shareholders and practitioners call increasingly for harmonised minimum standards to boost coherence and collective impact

Recommendation:

Renew IFIs' joint commitment on PSEAH, aligning with the most recent international framework CAPSEAH, and moving toward normative convergence. IFIs should develop and endorse shared minimum standards and expectations to reduce fragmentation and strengthen collective influence with partner countries. UN collaboration should be deepened and coordinated in-country engagement with UN agencies expanded.

Challenge 2: Despite great potential, IFI-UN collaboration is under-explored

IFI-UN collaboration remains under-developed normatively and operationally. IFIs and the UN system have complementary mandates and strengths in addressing SEAH which they could harness better through stronger collaboration. The impact of such a collective approach could be greater than the sum of its parts. But in practice, IFIs and UN agencies have not yet aligned with a common, system-wide framework, nor do they often conduct joint diagnostics or reinforce each other's engagement with governments. This limits their collective leverage to develop shared minimum standards and collaborate in-country. They also miss opportunities to coordinate prevention and survivor assistance which weakens collective leverage and reduces the sustainability and reach of GBV/PSEAH outcomes

Recommendation:

Deepen collaboration on PSEAH across the IFIs, the UN, and other partners. IFIs should institutionalise deeper collaboration among themselves, with the UN and with civil society to move beyond partial harmonisation and uneven operational cooperation. This should include joint diagnostics, shared analysis and indicators, mutual reliance frameworks, and coordinated engagement that leverages IFIs' financial influence alongside the UN's technical PSEAH expertise and links to survivor services.

Challenge 3: Vision, leadership and a renewed commitment: The need to elevate PSEAH strategically

IFIs lack whole-of-institution strategies for PSEAH. Only IFAD has a board-approved, organisation-wide vision that coherently links operational risk management, country engagement and internal systems. Such a whole-of-institution policy is pivotal for elevating PSEAH strategically. Without it, efforts tend to be fragmented, leadership signals uneven, and action often skewed toward compliance rather than transformational change. Without an overarching institutional vision to locate SEAH among broader development challenges, it is seldom integrated into high-level country or regional industry sector strategies. Early alignment opportunities in project planning are under-used and policy-focused work often relies on separate funding streams that constrain uptake.

Recommendation:

Build an institution-wide vision for protecting from SEAH. IFIs should mandate board-approved strategies that integrate internal systems, country or industry sector engagement and operational risk management into a single, coherent framework, positioning PSEAH as a development challenge that should shape operations, country engagement and internal culture rather than a narrow compliance exercise and strengthening leadership and follow-through on joint commitments. Available entry points within project risk management provide opportunities to incorporate PSEAH into high-level country strategies, while a coherent, institution-wide PSEAH policy that is required by executive boards and backed by regular, transparent reporting, would reduce fragmentation in internal systems by clarifying roles, strengthening coordination across functions, and improving end-to-end survivor support and reporting.

Challenge 4: IFIs are not working through a whole-of-institution vision for PSEAH

Strategic vision and leadership vary significantly across IFIs. Strong senior-level direction is a key enabler of effective PSEAH practice. Inconsistent prioritisation and follow-through weaken the collective capacity to elevate PSEAH as a strategic issue. Such unevenness also affects resource allocation. Where leadership signals are weak, PSEAH is less likely to receive dedicated staffing, sustained funding, or the institutional visibility needed to support its effective implementation. These strategic and systemic challenges translate into persistent operational gaps that limit consistent implementing, monitoring and enforcing PSEAH commitments across IFI portfolios.

Recommendation:

Strengthen leadership and accountability for PSEAH by ensuring visible leadership signals, clear responsibilities and adequate institutional prioritisation to drive resourcing and follow-through. Strong leadership is essential to position PSEAH strategically as a core development issue and to uphold commitments to a culture of respect, high standards of ethical behaviour and zero tolerance for inaction on SEAH. Leadership must be explicit in prioritising PSEAH through resource allocation, dedicated staffing, communication of good internal and external practice, and monitoring and evaluation to support effective implementation.

Operational challenges and recommendations

Challenge 5: Insufficient transparency in public reporting on PSEAH measures and incidents

Public reporting on PSEAH measures and incidents remains insufficiently transparent. Joint reporting after the 2018 commitment has ended. IFIs have no collective platform to demonstrate progress. No IFI publishes consolidated reporting on PSEAH implementation internally and in operations. Case reporting remains sparse and inconsistent compared to established mandatory practices across the UN system. These gaps reflect a lack of policy on reporting, limited supervisory rigour, weak digital tools for portfolio-wide tracking, uneven data systems and limited incentives. These all make it harder to build trust, strengthen learning and demonstrate institutional improvement.

Recommendation:

Increase transparency and accountability in reporting based on consistent monitoring that is facilitated by digital tools. Introduce joint IFI reporting as well as consolidated reporting on PSEAH implementation at institutional level. There have been strong calls for more transparent public reporting on PSEAH from IFIs to demonstrate accountability and allow stakeholders to understand if and how IFIs are meeting their commitments, appraise progress, exercise appropriate oversight and support further action. Beyond this, transparent reporting enables institutions to identify patterns, learn from recurrent risks, and strengthen safeguards, operational response, and survivor assistance.

Challenge 6: IFIs currently focus on compliance more than on effectiveness

This weak feedback loop reinforces a compliance-heavy approach rather than a focus on effectiveness. PSEAH measures are often applied as procedural safeguards rather than as tools for development impact, encouraging routines focused on documentation rather than outcomes. PSEAH therefore remains unevenly embedded across operations, constraining prevention and limiting adaptive decision-making and continuous improvement.

Recommendation:

Complement the compliance approach with measuring effectiveness and learning of PSEAH efforts. Introduce indicators measuring outcomes and use evaluations, audits and learning loops to assess and improve the impact of PSEAH measures. Effectiveness data, including from portfolio reviews and staff surveys, should inform strategic resource allocation, strengthen institutional learning, and close the gap between policy standards and practice through stronger knowledge management, learning and digitalisation.

Challenge 7: A shortage of PSEAH capacity and resources and the lack of capacity benchmarks result in prioritisation of only the highest-risk cases, leaving many projects underserved

Insufficient institutional capacity further compounds implementation gaps. Evidence points to shortages of dedicated staff, gaps in specialist PSEAH expertise, and the absence of benchmarks for minimum capacity. These shortfalls affect supervision, borrower support, and institutional learning, pushing IFIs to prioritise only the highest-risk cases, leaving many projects underserved.

Recommendation:

Ensure that institutional capacity for PSEAH reflects the scale of risk and ensure predictable funding and institutional capacity for portfolio-wide GBV/PSEAH action by establishing minimum institutional capacity benchmarks. IFIs must define staffing, skills and resource expectations institution wide. This should address fragmented, short-term and HQ-centric resourcing, strengthen specialist capacity in line with portfolio risk, and invest in the technical and digital systems needed to monitor risks, demonstrate compliance and support learning. IFI leadership and boards should prioritise PSEAH as a sound investment and advocate simultaneously for adequate and predictable resourcing in operations, including project budgets, concessional funding and trust funds where national systems are weak.

Challenge 8: Grievance mechanisms lack shared quality benchmarks

Grievance mechanisms in operations make capacity constraints quite visible; their quality varies, and they lack shared benchmarks. All IFIs maintain grievance channels, but accessibility and survivor-centred orientation differ significantly and gaps in referral pathways can expose complainants to harm. Inconsistent monitoring of usage data further limits opportunities to improve performance, while the absence of joint minimum requirements creates uneven expectations for clients and reduces coherence in handling SEAH-related complaints.

Recommendation:

Adopt shared minimum requirements for project grievance mechanisms. Harmonise standards for accessibility, survivor-centredness and referral pathways to ensure adequate, effective assistance to victims. This should address the absence of common standards for handling SEAH-related cases, strengthen confidentiality and expertise at project level, and ensure coherent, quality-assured referral systems.

Challenge 9: Challenges in adopting a victim-survivor-centred approach

Victim-centred approach: VCAs remain IFIs' weakest PSEAH area: implementation is uneven, accountability to survivors weak and expertise scarce. Referral pathways are often unmapped and services limited; reporting is inconsistent and underused. Inadequate follow-up can compound harm, erode trust and constrain institutional learning, especially in low-capacity contexts.

Recommendation:

Define and embed survivor-centred approaches across IFI policies and operations by embedding survivor-centred approaches as mandatory requirements, rather than voluntary guidance, to ensure that reporting practices do not undermine the autonomy of survivors. This should be supported through minimum standards, quality assurance and coherent referral systems that allow survivors to decide how to deal with their individual situations, report safely should they choose to, access services and have the option of receiving redress, shifting grievance mechanisms from formality to effectiveness. IFIs should embed survivor-centred approaches in legal agreements, safeguard frameworks and investigations and support local response capacity through community-based mechanisms and local civil society.

Challenge 10: IFIs are not yet leveraging the strengths of the private sector to advance PSEAH

The possibility for IFIs to collectively leverage their potential for change regarding PSEAH through private-sector operations has not yet been fully realised. The private sector arms of several IFIs have developed PSEAH guidance for companies in higher risk sectors such as major civil works, transport, agribusiness, hotels and manufacturing. However, due diligence, supervision and monitoring remain uneven — particularly where financial intermediaries are involved — and public and private sector arms do not reinforce one another consistently. These gaps reduce coherence across portfolios and weaken IFIs' ability to use private-sector leverage to strengthen outcomes.

Recommendation:

Leverage private-sector operations strategically to reinforce the uptake of PSEAH standards. Align expectations across public and private-sector arms within IFIs, strengthen the supervision of financial intermediaries and use private sector influence to strengthen PSEAH. This requires guidance, legal covenants and supervision approaches that are coherent across sovereign and private sector operations and adapted to private sector instruments, including co-investments and layered financing structures. Strengthening environmental and social management systems and grievance mechanisms in private sector operations is essential to improve visibility, oversight, accountability and survivor-centred responses.

Pathways to consolidate progress

Recognising that SEAH risks harming individuals, programmes, investments, and trust in institutions, neither IFIs nor member states can afford to let PSEAH investments erode at this crucial moment of heightened pressure on development finance. Robust PSEAH systems are fundamental for IFIs to uphold the highest standards of accountability, integrity and transparent risk management, and to continue to be trusted partners for member countries and communities. In this context, building the right policies, systems and expertise to prevent SEAH is a sound investment that far outweighs the costs and harms it can cause. IFIs' credibility, and the trust of member states, partners and communities, hinges on demonstrating that they can prevent harm, support survivors and uphold the integrity of development investments.

The strategic opportunities identified in this study offer a pathway to consolidate progress, reduce institutional risk, and ensure IFIs fully leverage their financial and operational influence to safeguard the dignity and rights of all people affected by the operations they finance.

About MOPAN

MOPAN is a network of 20 members⁴ committed to promoting an effective multilateral system, trusted to deliver solutions to evolving global goals and local challenges. MOPAN members work together to deliver relevant, impartial, high-quality and timely performance information as a public good through an inclusive and transparent approach. MOPAN's performance information mitigates risks, informs decision-making and supports change, helping to increase knowledge and trust amongst all stakeholders, and ultimately to achieve a stronger and better performing multilateral system.

4 As at 1 January 2026: Australia, Belgium, Canada, Denmark, Finland, France, Germany, Ireland, Italy, Korea, Luxembourg, Netherlands, New Zealand, Norway, Qatar, Spain, Sweden, Switzerland, United Kingdom, United States.

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