MURAD CODE PROJECT

Institute for International Criminal Investigations

PUTTING THE MURAD CODE INTO PRACTICE:

A Guide for Funders

March 2026



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INTRODUCTION

This Guide is designed for funders of any kind – governmental, multilateral or philanthropic – whose portfolios include partners or grantees who gather or use information about systematic and conflict-related sexual violence (SCRSV), and whose own work involves the gathering or use of such information. The Guide is inspired and framed by the Murad Code, that is, the *Global Code of Conduct for Gathering and Using Information about Systematic and Conflict-Related Sexual Violence*. The Code reflects minimum standards for the safe, ethical and effective gathering and use of SCRSV information. It expressly addresses funders.

Across conflict zones and post-conflict settings worldwide, information about SCRSV is gathered, shared and published on a vast scale – by researchers, documenters, official national and international investigators, humanitarian workers, advocates, civil society organisations and a range of other actors. Too often, the people at the centre of that information – survivors of SCRSV – are not adequately protected in the process. They may not fully understand what they are consenting to when they share their information. They may interact with people who are not trained do the work safely, or they may discover their information being used in ways that expose them to reprisals, stigma or re-traumatisation. These are not rare or isolated failures. These issues persist across sectors and contexts, not because those doing the work lack good intentions, but because the risks are poorly understood and minimum standards are too rarely built into the systems that shape how this work is designed and funded.

Funders and practitioners working on sexual and gender-based violence (S/GBV) do not always recognise that their programmes may involve engagement with survivors of SCRSV. In practice, the two frequently overlap. SCRSV is a form of S/GBV situated within a broader continuum of violence arising from systemic gender and other inequities. Organisations providing S/GBV services in conflict-affected or displacement, refugee or asylum settings – whether psychosocial support, legal aid, case management or livelihoods programming – will often work with individuals who have experienced SCRSV, even where that is not the explicit focus of the programme. Similarly, data collected through S/GBV information management systems, needs assessments or monitoring and evaluation processes may include information about SCRSV, regardless of how the programme is labelled.

Funders occupy a uniquely influential and important position in reinforcing minimum standards for how information about SCRSV is gathered and used in practice. The decisions made at funding level – about what to support, what to require of partners or grantees and how to measure results – shape the incentives, capacities and working cultures of organisations that they fund.

But funders are not only drivers of good and bad practice in others. They are also direct actors whose own internal processes, communications and behaviours can cause harm. Reporting requirements that collect unnecessary identifying details, site visits that treat access to survivors as a programme deliverable, and communications practices that extract survivor testimony for promotional purposes – these practices have direct consequences for survivors.

Funders also have responsibilities that extend beyond their individual grant-making. Insufficient coordination between governmental, multilateral and philanthropic funders has meant that survivors are often subject to repeated and unnecessary engagement by multiple actors funded in parallel. Furthermore, organisations that persistently fall short of minimum standards can continue to receive funding when funders do not share information or align their expectations.

KEY TERMS

Systematic and conflict-related sexual violence (SCRSV): Includes rape, sexual slavery, forced prostitution, forced pregnancy, forced abortion, enforced sterilization, forced marriage, trafficking in persons for the purpose of sexual violence and/or exploitation, and any other form of sexual violence of comparable gravity perpetrated against any person where that conduct is directly or indirectly linked to an armed conflict. It also includes such acts during peacetime or transitional phases when they are part of systematic, repressive, structured, or political violence, and when such violence is used to terrorise or destroy communities. SCRSV includes but is not limited to sexual violence which amounts to the international crimes of genocide, crimes against humanity or war crimes.

Partner/grantee: Some funders prefer "partner", others "grantees" to describe recipients of funding. This Guide uses these terms interchangeably.

The global context in which this Guide is published is particularly challenging. Funding for gender-based violence (GBV) programming is being cut significantly across governmental, multilateral and philanthropic sources. Organisations are competing for fewer resources, while new actors without specialist expertise in survivor-centred approaches are entering the field. At the same time, the broader political environment – including sustained pressure on international human-rights frameworks and the institutions that uphold them – makes rigorous, principled approaches to this work more necessary than ever.

PURPOSE AND SCOPE OF THIS GUIDE

The Guide provides a practical resource for governmental, multilateral and philanthropic funders who want to build or strengthen their ability to encourage, support and require the survivor-centred and effective gathering and use of information about SCRSV by their grantees, regardless of the size and duration of the grants, and of whether grant-making takes place at international headquarters or locally (e.g. via field offices or embassies). It covers grant-making to any actor who gathers or uses information about SCRSV, from police services, national and international human-rights bodies, international and local NGOs and corporate implementers to survivor-led organisations, UN entities, academic researchers, the media and the humanitarian community. The Guide covers every stage of the funding cycle, from strategy-setting and partner selection to monitoring, evaluation and closure. The Guide also can help funders to bolster their own adherence to the minimum standards reflected in the Murad Code and addresses what funders can do among themselves to positively influence funding ecosystems. The Guide encourages a genuine shift in how funding work is being done.

Like the Murad Code, the Guide covers work which involves the direct and indirect gathering and use of information about SCRSV, including open-source research and documentation conducted remotely. It covers a wider range of programming than funders may initially recognise as falling within the scope of their current work.

Relevant programming includes but is not limited to:

- S/GBV response
- SCRSV documentation and response
- Women, Peace and Security (WPS) agenda work
- human-rights reporting and monitoring
- justice and accountability focused work
- humanitarian projects that involve case recording or data collection, for purposes other than immediate care and support
- migration, trafficking, asylum and refugee focused response or research, including access to generalised public services and data collection in host countries
- conflict monitoring, analysis, reporting and resolution
- media, filmmaking and awareness raising programming
- academic and public health research.

WHAT IS THE MURAD CODE?

The Code was developed through an intensive global consultation process involving hundreds of experts and organisations, including UN entities, humanitarian organisations, governments, civil-society organisations and survivors themselves – as well as funders. It captures existing minimum standards, rather than creating new ones. It is not a set of discretionary best practices from which practitioners can pick and choose: it establishes a baseline of conduct that applies to anyone whose work falls within its scope.

THE MURAD CODE AND OTHER STANDARDS

This Guide focuses on how funders can incorporate the Code into their grant-making and other processes and should not be read in isolation. There are other important technical guidelines and standards governing work on SCRSV, GBV and with vulnerable populations that provide detailed operational guidance on specific aspects. The Code does not summarise or replace that wider body of guidance. Funders should use this Guide alongside other relevant standards, provided those standards are consistent with the minimum requirements distilled in the Code.

STRUCTURE OF THIS GUIDE

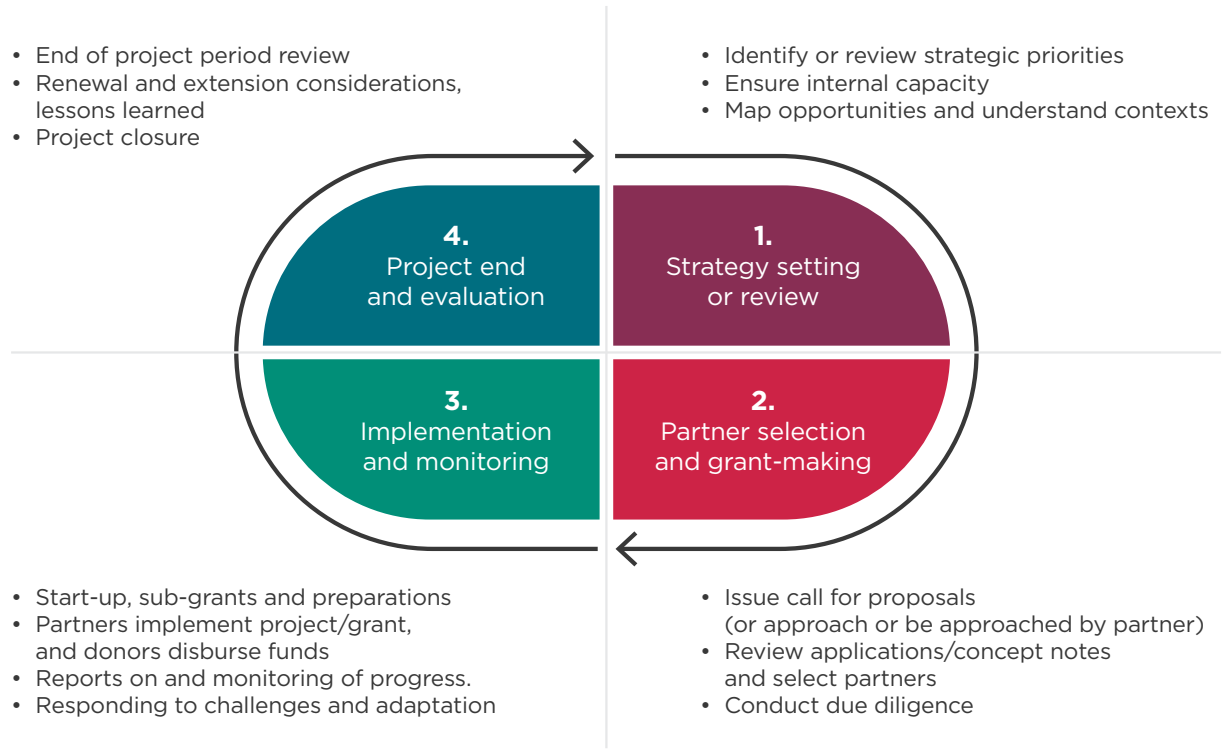


Diagram: *Funder project cycle with four main phases*

The structure of this Guide follows the phases in the diagram. While all the principles and minimum standards captured in the Murad Code are interdependent and mutually reinforcing, the Guide highlights principles that are especially relevant for funders to consider during each funding phase. It introduces key actions that should be considered to improve application of the minimum standards.

The Guide reflects two dimensions of the Code's application by funders:

- **Internal dimensions**: for example, how funders can apply the Murad Code to their own internal operations including processes to determine what they want to fund, their own internal capacity to understand SCRSV, and their internal systems to evaluate their funding and support their partners
- **External dimensions**: for example, how funders' grant-making processes can help, encourage and require implementing partners to adhere to the minimum standards, as well as how funders can engage with other funders and meaningfully engage in cross-sectoral discussions (humanitarian, justice, media, etc.) to encourage and support survivor-centred and effective information-gathering and use.

These dimensions are highlighted where relevant throughout the key actions (39 in total).

Some practical guidance has also been captured in tools annexed to the Guide.

PHASE 1: STRATEGY SETTING OR REVIEW

During this early phase, funders are developing or reviewing their strategies and preparing to disperse funds. This phase may look different for each funder. But for most it will include engagement and direction from a board or trustees; consultation with other funders on priorities and/or gaps in the funding landscape; engaging in strategic thinking and planning; reviewing prior funding experience and lessons learned (data from Phase 4); deepening understanding of the topic; and relationship-building with potential and existing partners. The activities funders undertake in this phase may happen concurrently or be dispersed through the other phases.

Funders can incorporate the Code's standards in three key ways during this phase:

- **Creating or reviewing strategic priorities and setting funding strategies** for the portfolios where SCRSV projects exist.
- **Building internal capacity** by hiring staff with competencies related to SCRSV information gathering and use, and/or developing these competencies in existing staff.
- **Developing deeper understanding of SCRSV and of the contexts in which they will fund**, including coordinating and communicating with other donors, stakeholders and experts.

PHASE 1: STEPS IN DETAIL

The steps in this first phase are outlined in more detail along with key actions funders can take to incorporate the Murad Code.

1. CREATE AND REVIEW STRATEGIC PRIORITIES AND SET FUNDING STRATEGIES FOR THE PORTFOLIOS IN WHICH SCRSV PROJECTS WILL FIT

Globally, embedding an approach to SCRSV information-gathering and use that centres the agency and choices of survivors, and ends harmful, extractive practices, will require sustained commitment from all actors, including funders. By incorporating the tenets of the Murad Code into funding strategies, funders can take concrete steps to ensure that any projects they fund that involve gathering and using information about SCRSV deploy ethical and survivor-centred practices. The key Code principles which should drive funders' strategic priority development and/or review include:

- ensure responsible decision-making about if, when and how to do this work (MC 4.1)
- centre survivors' choices as the basis for every action (MC 2.2), coupled with responsible decision-making through consultation (MC 4.1) and ensuring added value for survivors (MC 4.5)
- recognise survivors as diverse individuals who need flexible and individualised approaches, as well as inclusivity considerations for accessibility and reasonable accommodations to facilitate choices (MC 1)
- prioritise safety (MC 1.4), including risk assessment and mitigation (MC 5.3)
- recognise and challenge drivers of bad practice (MC 4.7)
- know the context (MC 6).

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Traditional power dynamics between funders and partners usually position partners with less influence. That can inhibit partners from sharing honest assessments of their capacity, programme achievements or ability to manage challenges because of concerns this will make their programmes less attractive to funders. Some of the key informants from private philanthropy and civil-society organisations that were interviewed in the development of this Guide advocate for a funding approach that seeks to mitigate this power imbalance by treating grantees as trusted, equitable partners (rather than as merely implementers) to foster more honest and transparent information-sharing.

4.1 Make responsible decisions: *We will assess the elements in this Principle ["Add value or don't do it"] to support responsible decisions about if, when and how to do this work. We recognise that our own self-assessments may benefit from consultation with others, such as community-based actors and external experts, to honestly assess whether our intended work and methods will be safe, effective and add value to survivors.*

Shift funders' focus to survivor-centred methods. An emerging way to ensure survivor-centred methods are fore-fronted is to ensure meaningful and effective survivor consultation in decision-making and priority-setting. This can be done in several ways, including:

- the creation and use of a survivor advisory group or board which can help inform funders' boards, trustees or other policy-making or priority-making persons
- ad hoc consultations with survivor networks or survivor representatives
- needs assessments/context-mapping which includes survivor networks' stated goals/needs (such information may be available open-source)
- consider requiring a survivor co-design model for project designs (where co-design is a relevant option and practically possible).

For funders with less experience in this approach, the *Guide to Survivor Engagement for the Use of the CARSV Stigma Toolkit for Justice* (due to be published in June 2026) of Synergy for Justice is an important resource developed by survivors to help ensure meaningful and safe consultations and engagement.

Add value or don't do it. Funders' strategies must ensure their funding adds value (MC 4.1, 4.5) by reflecting on the purpose of SCRSV information-gathering and use (whether it forms part of broader programmes or is the exclusive focus), and on the potential harm that it may cause if funders and partners do not follow minimum standards. There are numerous information-collection systems being funded, which underscores the importance of asking why a funder should focus such information-gathering and use and what value it would add. Even in contexts where there are no other relevant information-collection systems, it is important to consider the need and value added, as well as how these could be better coordinated, for the benefit of funders, partners as well as survivors. When deciding what and where to fund, base decisions on thorough analysis and, where possible, on survivor input (MC 4.1). Discourage and critically interrogate any emphasis on the importance of data concerning the number of SCRSV instances or of information sourced directly from survivors, as this may create incentives for partners to pressure survivors to share their experiences (MC 4.7).

4.7 Challenge drivers of bad practice: *We will critically test any pressure or justifications of 'urgency', 'public interest', quantitative targets, 'prevention' or any other such motives to proceed where we cannot do so safely, effectively and ethically.*

Engage with partners long-term: For many SCRSV survivors, it may take years after the sexual violence which they have experienced to feel safe enough to disclose to service providers and others. Additionally, it takes time to create meaningful connections with survivors and to offer them space, flexibility and care that centres their well-being and autonomy. One important way to increase

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accountability to survivors is to recognise the reality of how they experience SCRSV and that their needs will require sustained funder support. Where possible, funders should consider changing their funding cycles to better support long-term SCRSV information-gathering work to align with the reality of how survivors disclose.

Improving information-gathering and use practices will take continuous attention over time, and may not be accomplished by one-off grants or trainings. Longer-term relationships with partners can be critical to provide the necessary funding for partners to continue to embed the Code's standards into their work. Funding strategies that allow for multi-year partnerships will likely be more successful in achieving outcomes that shift practice to centring the needs of survivors.[1]

5.9 Enable follow-up: *We understand that communication between survivors and information-gatherers after their interaction can be critical for reasons such as sharing any resulting safety concerns, withdrawing or renewing consent and giving survivors feedback about progress and outcomes. We will strive to put in place an effective and secure way to communicate. If we cannot, we will discuss upfront with the survivor why not. For child survivors, we will take specific measures to enable contact with a carer for the child, with the support of a child protection expert whenever possible.*

KEY ACTIONS

1. (Internal) During funding strategy discussions, funders should consider several elements of supporting SCRSV information-gathering and use including:

   - Strategies must uphold the principles distilled in the Code by including their own commitment to the principles as a funding entity, in their plans for calls for applications and monitoring processes.

     Tool: Annexed Tool A: Introduction to the Murad Code for Funders: On-Boarding Presentation

     Further reading: *IICI, Evidencing Harms Briefing Note* (forthcoming, see Resources page on *Murad Code project website*)

2. (Internal) Funders should develop internal protocols and guidance that outline their stance on funding and decision-making related to SCRSV information-gathering and use to ensure systematic consideration and application of applicable minimum standards. This can include:

   - funding criteria to guide decision-making including that partners must adhere to the standards outlined in the Code
   - protocol if partners violate the standards during the project period and what information to share with other funders in an effort to assist their attempts to avoid funding poor and harmful information-gathering and use by grantees who cannot or would not adhere to minimum standards
   - policy or guidance on behavioural expectations during site visits including any interaction with vulnerable communities or survivors themselves (see Phase 3).
   - policy or guidance on requirements for independent oversight when governments request access to SCRSV archives (see Phase 4).

1. Even funders who do not work on SCRSV as a theme, or who give infrequent, one-off, or short-term funding should still ensure including the Murad Code principles and standards in their funding.

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3. (Internal) Develop rules and principles designed to ensure that funder's own teams do not promote unethical behaviour (including communication teams and their boards (where boards or similar governing bodies exist). Funders should issue clear guidance on what's acceptable and what not, including on obtaining consent when publishing any picture, video or name, and not distorting important elements of narratives, etc., of/from survivors for the sake of brevity and clarity.

4. (Internal) Reflect on the traditional power dynamics between funders and partners. More trusting, equitable and supportive relationships where partners feel that they can ask for more support or be honest about difficulties in their context can help build stronger funding strategies and programmes. This can mean discussing with partners how they will integrate the standards in the Murad Code and other resources and supporting partners through a process to deepen their survivor-centred practices.

5. (External) Consider developing longer-term partnerships with organisations to support their engagement with SCRSV survivors that extends past the duration of the conflict, crisis, etc. (e.g. in places like Timor-Leste, Bosnia and Herzegovina).

2. BUILD INTERNAL CAPACITY BY HIRING STAFF WITH COMPETENCIES RELATED TO SCRSV AND DEVELOP THESE COMPETENCIES IN EXISTING STAFF

Understanding the complexities of gathering and using information about SCRSV is not optional – it determines whether funding helps or harms survivors and is effective for the stated purpose. Before funding projects, funders must first put their own house in order: building the internal expertise, guidance and systems needed to ensure the Code's principles are upheld in any project which involves gathering and using SCRSV information.

Staff: Hiring staff who already have the relevant core competencies can greatly improve the ability of the organisation to uphold minimum standards. Ensuring advertisements for new positions reference the importance of understanding the standards captured in the Code, assessing candidates for jobs against the core competencies, and continuously ensuring commitment to a survivor-centred approach will provide a strong basis for effectively integrating the Code into the funding approach.

> **7.4 Build the right competencies:** *We will do this work only where we have the necessary knowledge, demonstrated skills and attitudes across our team. Those competencies include sexual violence and stigma sensitisation; understanding gender, diversity and context; working with people of different genders, disabilities and ages; informed consent and basic referral skills; risk recognition; safe communication and interviewing skills, including with children and in relation to remote interviews; trauma awareness and understanding; and information protection and preservation. We will keep the skills and knowledge which make this work safe and effective for our intended purpose up to date.*

It is equally important to plan for in-depth orientation and develop on-boarding materials on SCRSV and the Murad Code for all staff working on this topic, including in organisations with high staff turnover. Developing easy-to-understand materials such as distillations of the standards, short videos, checklists and case studies or scenarios to understand how decisions could impact survivors could make it easier for new hires and those who do not normally work on SCRSV to understand the issues. Training and orientation on the Code can be included in periodic refreshers with staff.

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Building internal understanding and capacity should not be confined to programme staff only, but should also include senior management, operations actors and, if applicable, even board members so that decision-making at all levels is informed by survivor-centred and effective approaches and adherence to the standards distilled in the Code.

Guidance for staff: The Code's principles should also be integrated into internal guidance, codes of conduct, policies and procedures for staff working on programmes that involve gathering and using information about SCRSV (such as peacekeeping, human rights, gender). Creating opportunities for staff to discuss and engage with the standards in the Code, how partners are applying it, and what funders can do to support application in the field can help ensure that sensitive and appropriate partners are selected and inform decision-making throughout the programme cycle.

7.1 Institutional responsibilities and support: *We recognise that we do not do this work alone. Most of us work in or for organisations. In organisations, we will implement this Code through leadership and commitment, policies, processes and resourcing, including in relation to consultants.*

External support: Even with in-house capacity on SCRSV, there may be situations where funders will need to bring in a deeper level of expertise to advise, for instance, when considering expanding programming to new contexts or reviewing applications. Having a trusted group of experts to consult with can help to ensure that the standards remain central to internal operations and decision-making.

7.5 Recognise our limitations: *We acknowledge that everyone has limits to their experience, expertise and perspective, as well as to their role or mandate. We will reflect honestly about, and will stay within, the boundaries of our knowledge, skills and understanding. Beyond our limitations, we will consult and work with others, such as trauma, security and child experts.*

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KEY ACTIONS

6. (Internal) Hire staff who can demonstrate understanding of the key principles of the Murad Code and their competence to work in a responsible, survivor-centred manner. These values can also be embedded into Codes of Conduct for staff to follow throughout their work.

   Further reading:

   - IICI, *Murad Code Competency Framework and Assessment Tools* which includes core competencies and values associated with the Murad Code, as well as ways to incorporate these into recruitment processes and interviews
   - IICI, *"In Our Own Words": Survivor Perspectives for Those Gathering and Using Information about Systematic and Conflict-Related Sexual Violence.* Published as part of the Murad Code project, this resource draws on the lived experience and insights of 164 survivors and shares direct quotes about how survivors experience retelling what happened to them to journalists, investigators, researchers and others. It is recommended reading for new staff who may lack familiarity with the range of ways in which poor practices can harm survivors and undermine the goals of information-gathering processes.

7. (Internal) Ensure that programme staff, portfolio managers and others are trained on the contents and principles distilled in the Code so they can work with grantees to implement it. Training and orientation on the Code can be included in regular on-boarding materials and for periodic refreshers with staff. It is also important to consider opportunities for existing staff to discuss and engage with the Code, how partners are applying it and what the funder can do to support application in the field.

   Tools:

   - Annexed Tool A: Introduction to the Murad Code for Funders: On-Boarding Presentation
   - Annexed Tool B: *Outline of the Murad Code*

   Further reading:

   - *Presentation: What does the Murad Code Entail?* (see Resources page on *Murad Code project website*)
   - The Red Line Initiative, *Guidebook on State Obligations for Conflict-Related Sexual Violence* (glossary link, key words link, and new AI chatbot)
   - PSVI International Alliance, *Survivor-Centred Approach: Best Practices from Members of the International Alliance* (compendium of best practices for implementing a survivor-centred approach)

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8. (Internal) Put in place policies and procedures that trigger when external expertise will be necessary to support funding decisions.

   Annexed Tool C: Sample Policy Statement: Use of External Expertise on SCRSV and the Murad Code

9. (Internal) Identify those with a deeper level of expertise on the Code and SCRSV who can be consulted, for instance, on expanding programming into new contexts or reviewing applications.

10. (External) Build the capacity to understand the standards in the Code with other funders in the space by socialising the Code in funding forums and other collaborative spaces. Funders, individually and collectively, can improve survivors' experiences by promoting safe and ethical information practices, strengthening coordination and knowledge-sharing, and supporting networks, outreach and convenings to reduce re-traumatisation and duplication.

3. BETTER UNDERSTAND SCRSV AND THE CONTEXTS IN WHICH YOU WILL FUND

Beyond grasping the core standards captured in the Murad Code, funders should actively educate themselves on SCRSV, including in relation to how it manifests in contexts where they are funding, its relationship to other forms of crimes and violations and other work being funded in that context, and by mapping key actors already working on the issue.

Research the contexts: Funders should conduct preliminary research to understand the issue of SCRSV and the context in the geographic regions of focus. This should include consulting with a range of stakeholders and conducting a situational analysis to understand the local systems, dynamics, conflicts and relationships in which SCRSV may be a feature. Funders should also seek to understand the landscape of actors working on SCRSV and other forms of GBV so that when prospective grantees submit applications, funders have some level of baseline knowledge about the context in which the applicants may work, including concerning others who are trusted and working with survivors, and about the organisational history and practices of the applicants (if they are based or have earlier worked there).

6.1 Know the context: *We will ensure that our team and those acting on our behalf base their work on a good understanding of the context in which the SCRSV took place and of the immediate environment around the survivor. We will identify positive and negative, direct and indirect impacts of the elements in this Principle [6: "Know and understand the contexts"] on survivors, their families and communities, and our work, and will ensure this understanding informs our preparation and work.*

Consider all of Murad Code **Principle 6,** including understanding culture (MC 6.2), understanding gender (MC 6.3), understanding stigma (MC 6.4), community dynamics (MC 6.5), individual, compounded and collective harms (MC 6.6), local laws and customs (MC 6.7), appropriate communications (MC 6.8), how to minimise negative repercussions (MC 6.9) and community-based support (MC 6.10).

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Impact of U.S. funding cuts on GBV services since January 2025

Beginning in January 2025, US government policy shifts—including a sweeping pause on foreign aid—have resulted in the termination or reduction of nearly $400 million in GBV programme funding. Consequently, over 60% of women's and women-led humanitarian organisations have been forced to reduce or suspend critical GBV services. A global survey indicated that U.S.-backed GBV protection initiatives suffered the largest net loss among protection services, with over $61 million terminated.[2] These funding reductions have had catastrophic real-world impacts. This - combined with the elimination of USAID, funding scale-backs by other governments like the Netherlands, Switzerland and the United Kingdom, and significant reductions from private philanthropy - mean there is far less funding for programmes to support survivors of SCRSV. Organisations will be competing for shrinking funding opportunities and new actors who previously did not work in the GBV field may enter bids for funding without nuanced understanding of the principles and values captured in the Murad Code.

Coordinate with other funders: Unless funders become better informed about the priorities and funding of other philanthropic, governmental and multilateral funders and coordinate together, harmful practices will continue. This includes survivors being unnecessarily interviewed multiple times by actors funded by different funders, increasing risks of re-traumatisation, differing accounts that may undermine their perceived credibility, etc. This is one example of why meaningful relationships with and collaboration with other funders is a prerequisite for more survivor-centred and effective information-gathering and use work. From the perspectives of survivors, individual funders adopting and encouraging sound approaches is important, but acting alone cannot address some of the grave consequences flowing from multiple funders supporting multiple actors to do the same kind of work in the same context.

Coordination and information-sharing among funders across the governmental, philanthropic, multilateral 'divisions' is essential to understanding the SCRSV landscape and promoting safe, ethical information-gathering and use practices. Coordination allows funders to share lessons learned and support harmonisation on information-collection. Coordination also helps verify that partners (who often receive funding from multiple sources) meet ethical standards, avoid duplication, and add value by considering the wider SCRSV ecosystem - who else is funding, what programming exists, and whether adequate support services are in place. Such coordination can include outreach to fellow funders (governmental, multilateral, philanthropic and others), convening thematic discussions, and sharing of practices.

5.7 Coordinate and cooperate: *We recognise the importance of multi-sector coordination and cooperation to prevent further harm, over-exposure of survivors and negative impacts on their rights arising from the cumulative effects of our work. Whenever appropriate, we will reach out to others working on the same issues, including humanitarian actors and community-based organisations, to seek ways to work together safely or to reduce risks of undermining each other's work.*

2. Humanitarian Action, "US funding freeze global survey" (US funding freeze global survey, round 2: preliminary analysis), 28 April 2025, *https://humanitarianaction.info/document/us-funding-freeze-global-survey/article/us-funding-freeze-global-survey-round-2-preliminary-analysis*.

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Funder coordination fora

Funders can use existing coordination spaces to align their strategy and approach to the standards in the Murad Code. For example, there are country and region-specific donor groups who meet regularly to discuss their funding priorities, such as those focusing on the "Whole of Syria" or the Great Lakes Region centred on the DRC. Some funders, such as the Swedish and Kenyan governments, convene around specific topics like addressing protection of women and girls in migration (see for example the Khartoum Process[3]). There are also funder initiatives to improve action on GBV, such as the Call to Action on Protection from Gender-Based Violence in Emergencies (Call to Action)[4] and the GBV Funders Collaborative Forum, who meet annually and at the regular Sexual Violence Research Initiative (SVRI) meetings. Funders also meet to convene thematic discussions (e.g. at Wilton Park[5]), and to share their own practices and lessons learned in philanthropic spaces (e.g. Ariadne Network). The UK government led the way on highlighting conflict-related sexual violence with the establishment of the Preventing Sexual Violence in Conflict Initiative (PSVI)[6] in 2014, and it has subsequently been carried forward by high-level meetings hosted by the UK and more recently by the rotating Presidency of the PSVI International Alliance – a group of 26 members (including 19 States, multilateral partners, civil-society organisations and survivors) that coordinates action on CRSV.

One challenge identified by funders interviewed for this Guide was that discussions are often held at a global level, but decisions are made at the country level and coordination between the two is lacking. However, in general, more systematic sharing of information between geographic and thematic coordination spaces could help promote context-appropriate implementation of the Murad Code.

In addition, funders should seek to require, support and fund coordination and collaboration amongst partners and other actors working on SCRSV information-gathering and use. Cooperation and coordination can support data minimisation and reduce unnecessary engagements with survivors. There are concrete examples of shared funding agendas or needs assessment/gap analysis on specific topics in some contexts, and of coordinated pooled funds or pipelines of funding which can promote shared values, target recognised needs and reduce duplication. Such coordination can involve sharing actor mapping (MC 5.5), increasing the use of alternative sources (MC 4.3, 8.1), minimising survivor exposure (MC 4.8) and encouraging data minimisation (MC 4.10). It can also include ensuring survivor input and consultation.

Influence academic research: Funders supporting academic research on SCRSV should consider their role in ensuring ethical research practices by facilitating more education of ethics boards that approve research around SCRSV. Ethics boards hold researchers accountable for standards and ethics, by asking them to explain and justify their approach, and have the ability to stop or delay research if there are concerns about unethical information-gathering and use practices. However, many ethics boards serve as a tick-box step and do not meaningfully address the commitment to doing no harm. Funders

3. *https://www.khartoumprocess.net/activities/technical-meetings/thematic-meeting-on-the-protection-of-women-and-girls-on-the-move-from-africa-to-europe-stockholm-18-19-september-2018.*
4. *https://www.calltoactiongbv.com.*
5. E.g. Report, CAPSEAH Dialogue: Sustainable and Effective Resourcing Models to Protect against Sexual Exploitation, Sexual Abuse and Sexual Harassment (April 2025) (WP3526), *https://www.wiltonpark.org.uk/reports/capseah-dialogue-sustainable-and-effective-resourcing-models-to-protect-against-sexual-exploitation-abuse-and-harrassment.*
6. UK Parliament, House of Commons Library, Research Briefing: Conflict-related sexual violence and the UK's approach (26 August 2025), *https://commonslibrary.parliament.uk/research-briefings/cbp-9577.*

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could directly support research councils and foundations/trusts to incorporate the Murad Code into their ethics review standards, as such standards can reinforce a commitment to research quality, and can impose requirements on researchers, directly or indirectly.

KEY ACTIONS

11. (Internal) Conduct research to understand the context in the geographic regions of focus or thematic areas of focus. This should include consulting with a range of stakeholders, most importantly survivors and affected communities, and conducting a situational analysis to understand the local systems, dynamics, conflicts and relationships in which SCRSV may be a feature. Ensure staff are equipped with the knowledge required to assess whether activities/projects are necessary, add value or are duplicative and uncoordinated.

12. (External) Improve coordination amongst partners and other actors to ensure more ethical practices with survivors (i.e. data minimisation and unnecessary engagements with survivors) and improve decisions on programmes based on their best interests.

    Further reading:

    - Sexual Violence Research Initiative (SVRI), *Funding Ethically* (focused on research on violence prevention, and including 7 steps which provide practical suggestions and considerations for 'better funding' at each stage of the research funding process.)
    - Foreign, Commonwealth and Development Office, *International Protocol on the Documentation and Investigation of Sexual Violence in Conflict (Second Edition)* and country-specific supplements: *Syria*, *Iraq*, *Myanmar*, *Sri Lanka*.

13. (External) For funders working to support academic research on SCRSV, targeting research councils and foundations/trusts directly to incorporate the Murad Code into ethics boards could strengthen commitment to incorporating Murad Code standards and impose requirements on researchers, directly or indirectly.

PHASE 2: IDENTIFICATION OF POSSIBLE PARTNERS AND APPLICATION/CONCEPT NOTE REVIEW

During this phase, funders may be proactively reaching out to possible partners or creating calls for applications, reviewing prospective partners' proposals or concept notes, and deciding which partners and projects to fund. Different funders have different approaches to this phase. For example, private foundations may focus more on identifying prospective partners first, whereas governmental donors may be more likely to issue specific open calls for proposals or applications for funding. Regardless, funders must assess project proposals or concept notes, as well as prospective partners by conducting 'due diligence'.

This phase requires funders to ensure that prospective partners can demonstrate their ability to uphold the Murad Code's minimum standards in their applications. Funders should highlight the importance of demonstrating awareness of and adherence to these standards in their communications with possible partners or in the call for applications, including in relation to eligibility criteria for prospective partners and throughout their due diligence processes. Once grants are awarded, the survivor-centred principles captured in the Code should be considered and embedded when working with partners to finalise agreements, confirm deliverables and indicators, and clarify reporting expectations.

There are three key opportunities to incorporate the Code's standards during this phase:

1. **Conducting due diligence on potential partners.**
2. **Developing a call for applications and evaluating applications or project concept notes.**
3. **Communicating final decisions, finalising grant agreements, confirming deliverables and indicators, and clarifying reporting expectations.**

Funders should state in all communication with prospective partners, including in calls for applications, the desire or requirement for applicants to adhere to the standards in the Code for any projects involving SCRSV information-gathering and use. It is also necessary to include information that outlines the types of activities and budget lines funders will support partners with to aid them in upholding these standards.

PHASE 2: STEPS IN DETAIL

The steps in this phase are outlined in more detail along with key actions funders can take to incorporate the Murad Code.

1. IDENTIFYING POSSIBLE PARTNERS

In any outreach or communication with possible partners, funders should ensure that their materials clearly outline their desire or requirement that any SCRSV information-gathering and use are designed and will be implemented in a manner aligned with the strategic priorities identified during Phase 1. Eligible partners should have appropriate capacity and competencies, or a realistic plan to develop those, to be able to deliver on these expectations. This section focuses on the capacity and organisational approach of the potential partner.

Ask prospective partners to demonstrate how they will implement the Code's standards: Communication and funding solicitations should state funders' desire or requirement for the minimum standards to be included in project proposals and plans. Through the application process (e.g. when demonstrating they meet the eligibility criteria, during the due diligence process, or at other relevant

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phases) partners must be able to demonstrate understanding of the Code's principles and how these have been incorporated into their project plans. For example, this can include building the capacity of their team and partners and developing procedures on data security in line with the Code prior to any information-gathering and use.

7.3 Select the right team and partners: *We will build a team (including interpreters, intermediaries, guides, fixers) and select partners and others acting on our behalf who share our commitment to this Code. We will also consider the diversity, representation, confidentiality, safety and flexibility implications of these selections.*

Example eligibility wording

US State Department Women's Bureau *GBV: FOSTERING ACCESS, RIGHTS AND EQUITY (FARE) GRANT PROGRAM* (2024)

"To be eligible for funds under this grant program, the applicant must be a nonprofit organization. … Applicants should provide evidence that they have the expertise and ability to provide women workers with knowledge and tools to address and mitigate gender-based violence and harassment (GBVH) in the world of work, including using trauma-informed and survivor-centered approaches."

Demonstrating understanding of the Code's minimum standards involves showing how programmes will respect survivors and the safety of the information they gather by putting in place plans for project-closure and long-term data security. In their applications, potential partners should be able to explain how they will secure the information gathered to ensure privacy and protection (also after the end of the project or funding), as well as their plans for archiving the information at the eventual close of the project. Funders can request information up-front about how grantees will develop exit and archiving strategies before projects close, so data is not abandoned. For more information, see Phase 4.

7.8 Build confidentiality protections: *We will put in place confidentiality protocols and measures to protect the survivor's information, privacy and safety, including taking special care to ensure the security of any digital communications, data management and storage.*

In times when funding restrictions or cuts are impacting a wide range of civil-society actors, some organisations without much experience may be considering new types of work to maintain their organisational footprint and viability. This is also sometimes called 'pivoting' or mandate creep. This may mean that when there are funding opportunities for GBV or SCRSV specifically, potential partners without the necessary experience may apply to try to access the funding. It is important to carefully evaluate applications and possible partners to ensure they have the necessary understanding and capacity to program on sensitive topics such as GBV or SCRSV specifically.

Selecting partners: Funders must select partners that demonstrate an understanding of the relevant minimum standards and the importance of adhering to them. If in the application or in the partnership discussions it is evident that the applicant is not prepared to uphold the commitments distilled in the Code, the funder should not provide funding for SCRSV information-gathering and use (but can consider providing funding for, for example, providing immediate care and support to survivors if that is within the competence of the prospective partner and if it is otherwise appropriate to do so).

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Funders should avoid any assumptions about kinds of prospective partners being capable, or incapable, of adhering or learning to adhere to the Code's minimum standards. For example, a well-established, large, well-funded local or international investigation body or documentation NGO applying for funding must be as carefully assessed as a small, less institutionalised organisation. While one might have more resources and structured systems, the other is likely closer to affected community and may be able to create more sustained responses and support for survivors and affected communities. However, survivor and practitioner accounts underscore that such assumptions can be baseless and dangerous, and the Code promotes a rigorous approach stripped of such assumptions.

That said, it is important to recognise the potentially unique role of small community-based organisations, particularly survivor networks, women-led organisations, LGBTQI+ organisations, etc. While these organisations may not always have the sophistication, systems or resources that large international NGOs (INGOs), private development companies or international organisations do, they can play a critical role in support, trust and relationship building and sustainability of SCRSV responses. Without them, it is unlikely that international or larger national organisations can comply with survivor-centred principles. They should not be overlooked for funding.

6.10 Community-based sustained support: *We recognise the important role of trusted community-based groups and support systems for the continuity of support for survivors, building trusted relationships, empowering survivors and for tackling negative attitudes in the community towards survivors. Such groups can include survivor networks, women's organisations, LGBTQI+ organisations, organisations for children, and organisations for persons with disabilities. Whenever appropriate, we will seek to work with such groups.*

Special considerations for smaller, community-based organisations

Decades of GBV programming demonstrate that the smaller, local and women's organisations are usually the ones that GBV survivors, including SCRSV survivors, trust and seek out for support. These organisations also face multiple barriers to accessing funding to support institutional- and systems-development or build staff capacity, let alone continue their usual programming. Often, smaller, community-based and women's organisations may not have the institutional capability, structures or language to demonstrate in an application how they adhere to the Murad Code – although they may be the actors who will most likely embody the standards.

It is imperative that funders consider this reality as they make funding decisions. While SCRSV information-gathering and use must adhere to the standards in the Code, funders should consider the critical role of community-based women's organisations and their limited access to funding, in parallel with the need to make decisions that best support survivors. This may result in funders deciding to provide funding to an organisation that understands the principles of the Code but lacks institutional systems or is unable to demonstrate the principles in practice (for example, lacking technological solutions to implement confidential databases or the funding to train all their staff formally). Such funding can be used to build the necessary capacity and systems, so local women's or other suitable local organisations stay open and available to the survivors who trust and rely on them.

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Emphasise expectations to work in collaboration: Funders can describe to prospective partners how they will be expected to effectively communicate and collaborate with other service providers and actors across the SCRSV space. This type of coordination is essential to ensure survivors can be connected to available services, as well as to ensure actors coordinate and do not overwhelm individual survivors with requests for information and disclosures of their experiences. Coordination requires more support than just expressing a desire to coordinate. Funders should expect to support budget lines for partners, including for dedicated staff-time (i.e. coordinators); time and space for coordination meetings; transportation; and documentation. Any such collaboration and coordination should respect confidentiality and other rights and wishes of survivors.

5.5 Know who else is gathering information: *We will find out who else is gathering information from or about survivors and for what purposes, to consider if our work is necessary and will add value, and as a foundation to coordination and collaboration.*

5.7 Coordinate and cooperate: *We recognise the importance of multi-sector coordination and cooperation to prevent further harm, over-exposure of survivors and negative impacts on their rights arising from the cumulative effects of our work. Whenever appropriate, we will reach out to others working on the same issues, including humanitarian actors and community-based organisations, to seek ways to work together safely or to reduce risks of undermining each other's work.*

Require partners to demonstrate an understanding of context: Requesting a context analysis will enable funders to assess their potential partners' understanding of the context, culture, gender dynamics and legal context in which their work will take place. That analysis can form the basis for more (funded) in-depth analyses during the project period.

Provide vicarious traumatisation support: Funders should ask partners to describe and plan efforts to reduce the potential for vicarious traumatisation in staff and others who would be involved in information-gathering and use. Funders should indicate that potential partners can include budget lines for training on preventing such traumatisation and for plans to manage risks of vicarious trauma, including support for staff and other project personnel. Unless a funder requires applicants to consider this and emphasises it as necessary to include in budget lines, many grantees won't be able give this the attention it deserves due to lack of funding.

7.10 Manage risks of vicarious trauma: *We will ensure measures are in place to minimise the harmful effects of the work on ourselves, our team and others impacted. We will ensure basic training on signs and symptoms of trauma, vicarious trauma, compassion fatigue and burnout, and ensure institutional and team support protocols and safe working methods. We will include measures to manage these risks when people are working outside a team or office environment, including working remotely.*

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Vicarious trauma

Gathering and using information about SCRSV carries a high risk of vicarious traumatisation, as exposure to survivors' accounts of extreme violence and suffering can deeply impact the mental health of those who gather and use such information and other involved in the process, including interpreters, translators and data analysts and data managers. Addressing potential harm to those who gather and use information is an important aspect that is often overlooked in the work. Vicarious trauma can have a range of negative effects on professionals, similar to those experienced by trauma survivors. Those working closely with survivors can be affected in significant ways.[7]

Incorporating specific support to address vicarious traumatisation can help to further reduce harm.[8] Repeated engagement with traumatic narratives may lead to emotional exhaustion, intrusive thoughts, and shifts in worldview or sense of safety. Without adequate support, such as supervision, debriefing, trauma-informed organisational practices, and psychosocial support, staff may experience burnout or secondary trauma. Recognising and mitigating these risks is essential to sustain ethical and responsible SCRSV information-gathering and use.

KEY ACTIONS

14. Perform due diligence of the potential partner, including concerning its experience of SCRSV work in the relevant context, track record, approach/attitude, position on actor mapping, and coordination and collaboration.

Tools:

- Annexed Tool D: Partner Selection Conversation Guide for SCRSV Information- Gathering and Use (including red flags)
- IICI, *Murad Code Audit Tool* (see Resources page on *Murad Code project website*)
- IICI, *Murad Code Competency Framework and Assessment Tools*, which includes core competencies and values associated with the Murad Code, as well as ways to incorporate these into recruitment processes and interviews

7. SVRI, Guidelines for the prevention and management of vicarious trauma among researchers of sexual and intimate partner violence (2015), *https://www.svri.org/sites/default/files/attachments/2016-06-02/SVRIVTguidelines.pdf*.
8. SVRI, Blog: Survivors are researchers too, *https://www.svri.org/survivors-are-researchers-too/*.

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15. (External) Ask about the partner's efforts to reduce the potential for vicarious traumatisation in staff that may be experienced by those documenting SCRSV cases. If necessary, include budget lines for specific support on preventing and responding to vicarious traumatisation.

Further reading:

- Sexual Violence Research Initiative (SVRI), Guidelines for the prevention and management of vicarious trauma among researchers of sexual and intimate partner violence
- SVRI, Online Learning Platform, Dare to Care: Wellness, self and collective care for those working in the VAW and VAC fields (2026) (self-paced, modular course)
- Social Development Direct (SDD), Annotated Bibliography: Collective Care Processes and Practices (20 March 2024)
- SDD, Tipsheet: Collective Care (27 February 2024)

16. (External) Share what kind of support on implementing the Murad Code can be provided to the awarded partner. This may be an orientation session or capacity-building sessions on the Code, technical support in applying the Code's commitments to the project, coordination with other similar projects, funding tools such as database software or printers, or sharing of other resources.[9]

2. DEVELOPING CALLS FOR APPLICATIONS AND EVALUATING APPLICATIONS/ CONCEPT NOTES

In developing templates or forms for calls for applications, for unsolicited applications or for submission by prospective partners who funders have approached themselves, and in reviewing applications, it is essential that funders incorporate an assessment of the adherence of the project design, plan and budget to the principles in the Murad Code. In this section "call for application" is used as shorthand to include unsolicited applications and submissions requested by funders following their own outreach to prospective partners.

Developing calls for applications: Some funders provide an elaborate set of templates for applicants to complete, which include an application form with specific questions to demonstrate the potential partner's experience and capacity to deliver the project, as well as risk management, conflict and gender analysis, specific requirements to demonstrate gender equality/mainstreaming, sustainability, project design, added value considerations and budget templates. Whether such criteria form part of calls for applications, unsolicited or funder-requested applications, such documents/forms give funders an opportunity to include either a broad question(s), such as "How will you ensure your activities will be survivor-centred, trauma-informed and in keeping with the principles set out in the Murad Code?" or to build in more specific questions around project design or the key dimensions of the Murad Code, set out below.

9. For example, see tools annexed to this Guide and the resources on the *Murad Code project website*.

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EXAMPLE WORDING FOR CALLS FOR APPLICATIONS

"All projects that involve the gathering, storage, analysis or use of information related to systematic and conflict-related sexual violence (SCRSV) are expected to adhere to the minimum ethical and survivor-centred standards distilled in the *Global Code of Conduct for Gathering and Using Information about SCRSV* (the 'Murad Code' *www.muradcode.com*). These standards reflect internationally recognised principles designed to protect the safety, dignity, autonomy and privacy of survivors while ensuring that information-gathering is purposeful, ethical and minimises harm.

Applicants must demonstrate how their proposed work will uphold these standards. This can be achieved by describing existing organisational capacity and systems that will uphold and protect the rights, safety, autonomy and privacy of survivors to their information. In the event these do not exist or need to be strengthened, applicants are encouraged to include concrete plans to build the necessary capacities, policies and safeguards during the project prior to any information-collection or use from or about survivors. In addition, applications should clearly justify any direct engagement with survivors, prioritise the use of alternative data sources whenever possible, and outline robust measures for informed consent, confidentiality, safe storage of information, trauma-sensitive approaches and coordination with other actors to avoid duplication and re-traumatisation. Applications should also set out how considerations in Murad Code Principle 4 informed the project design and concept, and the steps taken to ensure the activities add value for survivors.

Proposals that do not reflect an understanding of the Murad Code or that lack plans to meet its minimum standards will be scored lower or not considered for funding."

CASE STUDY:

US Department of State Democracy, Rights and Labour, 'Dignity in Documentation Initiative' Notice of Funding Opportunity (2024) (DIDI NOFO)

Focused on 'Integrated and holistic CRSV documentation' defined as *"the safe, effective, and survivor-centric gathering and use of CRSV information situated alongside transformational support services for victims, survivors, and their families, [*referencing the Murad Code, Global Code of Conduct for Gathering and Using Information About Systematic & Conflict-Related Sexual Violence, 2022*]."*

It required that applicants' programmes *"must take a survivor-centered and trauma-informed approach, prioritizing the individual needs and efforts of CRSV survivors, while supporting survivor networks, civil society, and community-based organizations*."

"Applicant narrative must consider and address the following activities in proposal design: …

- *Building the technical capacity of stakeholders engaged in integrated and holistic CRSV documentation processes while addressing the context-specific needs of survivors and their families;…*
- *Implementing programs that advance and support Murad Code best practices, inclusive of building and bolstering a community of better practice for, with, and concerning survivors of CRSV;…Prioritizing survivors' agency, dignity, privacy, physical and emotional safety, and active and informed consent, while upholding the well-being and wishes of survivors throughout CRSV documentation and transitional justice processes."*

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Advertising calls for applications: To reach experienced organisations that work closely with SCRSV survivors, funders should consider where to disseminate their call for applications. Often these are circulated within existing networks and/or on websites in a language which may effectively exclude potentially suitable partners, including women-led organisations, community-based organisations or other local actors who are not part of those networks or do not work in that language. For organisations that do not have an existing relationship with a funder or have not applied for funding from them before, there are very few opportunities to speak with funders to better understand the application process, which can further advantage organisations already within a funder's network.

Evaluating applications: Funders must be prepared to evaluate the applications and determine which groups are committed to upholding the standards in the Code; and allow for budget approaches that allow for the flexibility needed for partners to follow survivor choices. Due to new technologies and artificial intelligence (AI) capabilities, potential partners may be able to improve the quality of written proposals without the actual capacity to implement programming according to the standards. It remains incumbent upon funders and evaluators to use extra due diligence to ensure organisations have the capacity as described in proposals.

Apply available guidance for open-source and remote work: Funders should ask in reporting to describe how partners adhere to the applicable minimum standards, including in projects involving the gathering and use of only open-source information. Projects involving remote or in-person engagement with survivors may require more careful evaluation of partners' reporting on how they, for example, maintain respectful and safe interactions and minimise harm to survivors.

How the concept/project was responsibly designed in alignment with the Murad Code: Donors could include in their template concept note or grant application (or their evaluation criteria/guidance) any or all of the following questions derived from **Murad Code Principle 4 (Add value or don't do it)** on responsible decision-making:

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CHECKLIST TOOL

MURAD CODE PRINCIPLE 4: CHECKLIST OF QUESTIONS TO ASK POTENTIAL PARTNERS REGARDING RESPONSIBLE DECISION-MAKING IN PROJECT DESIGN

4.2 What is our intended role and purpose in gathering or using information about SCRSV? *Include your purpose and role; the limitations and boundaries of that role; what information is needed from whom and in what form to achieve your purpose; how you intend to collect and use the information and who you intend to share it with for that purpose.*

4.3 Are there alternative sources? *If you intend to collect or use information from survivors, include the reason why you cannot use alternative sources; if you are using alternative sources, set out your considerations of privacy, and legal and security implications from the collection, receipt or use of indirectly sourced information from or about survivors, even if the information is in the public domain, in archives or retrievable online, and set out how you intend to verify survivor intention (as it relates to individual survivor information) (also MC 8.3 and 8.4).*

4.4 Are your intended outcomes realistic? *Based on resources including expertise, timescale and resources, what are the internal and external risks to delivery?*

4.5 Will we add value? *What is the added value or benefit of your work or actions to survivors?; detail any survivor consultations or co-design of the work, and what work you have done to understand others also gathering or using SCRSV information in this context (MC 5.5).*

4.6 Weigh added value against risks. *What risk assessments have been undertaken, what mitigation measures identified, what flexibility has been built into the design?*

4.7 Challenge drivers of bad practice. *Address how you have identified and mitigated against any potential drivers of bad practice or harm.*

4.8 Minimise exposure risks. *How has your design contributed to minimising survivor exposure risk?; include measures for information-sharing and consent and use of existing information, and include measures to mitigate risks of re-traumatisation and inconsistent accounts by survivors (as a potential consequence of multiple interviews).*

4.10 Data minimisation. *How does your project design ensure data minimisation?*

This checklist highlights the importance of clarity of purpose of information-gathering or use, and the central role of coordination, actor mapping and understanding whether additional collection or better information-sharing is needed. Donors should expect and encourage careful thought and articulation of these decision-making processes.

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QUESTIONS TOOL

QUESTIONS TO ASK POTENTIAL PARTNERS ABOUT GATHERING AND USING SCRSV INFORMATION

What information is actually needed for the intended purpose? For example, criminal justice processes often require specific and extensive details to prove guilt beyond reasonable doubt. Very few other purposes require the same level of detail about the sexual acts perpetrated on survivors.

What are alternative sources for the information needed? While many actors assume that they need first-hand accounts from survivors. In reality, there often will be alternative sources, including sources who can share statistical or pattern information (not identifying or personal stories) or have informed consent from survivors to share their information with certain actors for certain purposes.

How will that information be transported and stored safely and securely? Are there protocols, hardware, encryption and training to ensure this can be done? Has it been risk-assessed?

How will the information be managed and shared only where there is informed consent? Is the survivor's informed consent stored with the information (redacted for confidentiality)? Is there an information-sharing log which indicates permissions given by the survivor, and when and who the information has been shared with?

What information is actually needed for donor reporting and monitoring and evaluation?: Take into account privacy, confidentiality, security and informed consent of survivors or certain groups of actors or organisations, especially (bit not limited to) those in heightened risk settings.

What will happen to the information at project's end? If a project is dependent on only your funding, what is the plan for the confidential information shared by survivors after the funding ends? How will they keep it safe? Is there a destruction policy? Have the survivors consented to this?

Key dimensions of the Murad Code in application/project concept evaluation: While the Code contains a full set of considerations, there is a one-page reference tool included immediately below which highlights some key dimensions which funders should look for and assess in terms of project design, budget and resourcing, including during reporting.

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KEY DIMENSIONS TOOL

TEN KEY DIMENSIONS OF THE MURAD CODE FOR PROJECT APPLICATION/CONCEPT EVALUATION

i. Preparation is key (MC 5.1), including actor mapping (MC 5.6) and MC Principle 4 parameters for responsible decision making on project design, including co-design.

ii. Demonstrated knowledge and understanding of context (MC 6), including context and gender analysis, demonstrated experience in-country, community-based partners and community consultations, and inclusion of this expertise within team (MC 7.3).

iii. Prioritisation of safety (MC 1.4 and 1.5), including risk assessment and mitigation (MC 5.3, 3.8), be accountable, including demonstrated risk management, individualised survivor safety and well-being approaches, complaint mechanisms and feedback pathways.

iv. Demonstrated SCRSV competencies in the team, including team selection (MC 7.3) and competencies (MC 7.4), including regarding experience of SCRSV information-gathering; project management; survivor engagement; SCRSV specialists, child rights and child engagement specialists; context and language expertise; and basic psychological first aid capacities.

v. Systems, policies, procedures in place or plan to put in place (MC 7.1 and 7.8), including information protection, confidentiality and privacy systems and protocols, informed consent protocols, escalation protocols for emergency responses, designing and implementing mechanisms for follow-up (MC 5.9), continuity (MC 7.9), including in support (MC 6.10).

vi. Actor mapping and alternative sources (MC 4.3 and 8.1), including a well-considered assessment of whether collection directly from survivors is needed, what alternative sources may be available, whether there is consent for information-sharing, what information is needed to what standard of proof/level of veracity and level of detail for the intended purposes.

vii. Individuality and inclusion (MC 1, and 5.2), including recognition of and design for survivors as individuals, including building in flexibility for location, personnel, intersectional needs and challenges, adaptations and expertise around disabilities, persons under 18 years old, and men and boys.

viii. Informed consent (MC 2), including the importance of a voluntary informed consent two-way dialogue, with time to consider and opportunities to ask questions and seek advice; and consideration of how this is built into planning and timescales, of how withdrawals of consent and changes in circumstances will be managed, and how, if applicable, informed consent in relation to open-source information will be handled. Good projects also seek to create ways for survivors to choose to come to approach information-gatherers if they want to, rather than information-gatherers approaching survivors out of the blue (which creates pressure to agree (MC 2.1).

ix. MHPSS and well-being support (MC 5.6 and 7.7), including mapping and vetting accessible support services in survivor locality, emergency services, and vicarious trauma prevention and response systems (See also IICI, *Murad Code MHPSS Guidance* (due to be published in March 2026).

x. Safe spaces and interactions (MC 9 and 10), including identification of options for space spaces, built in survivor co-design and planning for interactions/interviews, enhanced privacy, reduced time pressures, prioritising safety and well-being over numbers.

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Budget and resourcing: Look for budget lines and resources/activities that support these key dimensions. Related guidance is included in annexed tool E.

Timelines and sustainability: Consider whether timelines for activities are realistic (e.g. do not add pressure on survivors, and do not try to do too much in a short time).

Using external reviewers: Some funders may involve external reviewers in the application-review process. These reviewers must be familiar with the minimum standards in the Murad Code. Funders may wish to consider having short education or on-boarding materials for external reviewers, particularly around some key aspects in the call for applications (such as demonstrating an understanding of survivor-centred approaches).

KEY ACTIONS

17. (Internal) In developing the call for application and project evaluation criteria, include the following information:

    a. References and links to the Murad Code along with an explainer on why it is important that it be included in applications.

    b. Clearly define priorities and requirements, to encourage adherence to the standards, as well as discourage bad practices and limit reliance on survivor testimony.

    c. The types of activities and budget lines allowable for partners to adhere to the standards.

    d. How the project will be evaluated in relation to the Code. It is important to note that applications are not expected to have the full Code application in place at the project start but that plans and activities are included to support adherence to the standards. Indication that projects that do not mention any plans or activities for Code implementation may be scored lower or be unsuccessful.

    Tools: Box Example wording for calls for applications, and Case study: DIDI NOFO (see *page 23*)

18. (Internal) Eligibility criteria for any project involving gathering and using information about SCRSV should include ensuring the potential partner makes at least one reference to how the Murad Code will be applied to the project plans and implementation. Applications should clearly state a requirement that partners demonstrate how they would ensure that projects will be survivor-centred, effective and adhere to minimum standards distilled in the Code.

    Tools:

    - Murad Code Principle 4 checklist of questions to ask potential partners regarding responsible decision-making in project design (see *page 26*)
    - Ten key dimensions of the Murad Code for project application/concept evaluation (see *page 27*)
    - Annexed Tool E: Guidance on Activities, Resourcing and Budget Lines
    - Annexed Tool F: Red flags on Concept Notes and Project Designs
    - IICI, *Murad Code Audit Tool* (see Resources page on *Murad Code project website*)

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19. (Internal) Use available guidance, including for open source and remote SCRSV information-gathering and use projects.

Further reading:

- IICI, *Murad Code Competency Framework and Assessment Tools*
- IICI, *IICI guidelines on remote interviewing* (Aug 2021)
- IICI and Human Rights Centre at Berkeley School of Law, *Open-Source Practitioner's Guide to the Murad Code* (November 2025)

20. (Internal) Develop guidance for any external reviewers of applications to ensure that they abide by and consider the standards in the Code, which may include sharing this guide with them.

3. COMMUNICATING FINAL DECISIONS ON FUNDING, AND FINALISING GRANT AGREEMENTS

Communicating decisions on funding: Once funding decisions are made, funders typically communicate formally to applicants via written notifications, often with basic feedback on the outcome. For partners who were not selected (especially if it was for their lack of adherence to the standards in the Murad Code), funders should share this assessment and point to any relevant guidance, debriefs, or learning sessions to strengthen their future applications. This could help unsuccessful applicants reflect on their capacity to work with – and gather information from or about – survivors of SCRSV.

Integrating the Code in agreements: By this stage, selected partners will have expressed their ability to understand and apply the Code's principles in their concept note/application. In the finalisation of agreements, it should be reaffirmed with the partners, including clearly spelling out the funder's commitment to ensuring a survivor-centred approach and the steps if the minimum standards are not upheld, including impact on future funding.

Integrating the Code in grant or partnership agreements may bolster undertakings and efforts to do survivor-centred and effective information-gathering and use. Such integration can help implementers and funders to stipulate and manage expectations. However, just like safeguarding, anti-sexual harassment and anti-fraud provisions, merely referencing the Code or its minimum standards is unlikely to be effective on its own.

While adherence wording would be more appropriate for large organisations/partners who have demonstrated the right capabilities, resources and budget lines, softer language setting clear expectations for development, capacity-building, and reporting on progress can also work to support smaller, developing organisations with less sophisticated systems and policy structures. Examples of wording for grant agreements are set out below.

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EXAMPLE WORDING FOR GRANT AGREEMENTS

Development wording:

"Over the course of this Agreement, the Grantee is expected to demonstrate improvements in its and its sub-grantees' internal controls, policies, capacity and practice related to the survivor-centred standards set out in the Murad Code. As part of its regular reporting, the Grantee shall report on the developments and improvements in this area."

"To improve project implementation, the Grantor and Grantee may conduct capacity-building on survivor-centred approaches for the Grantee and its sub-grantees after the signature of the Agreement. The objective of the activities is to ensure that the Organisation and its sub-grantees' management and delivery of the project can be done safely, ethically, efficiently and in accordance with the requirements of the Murad Code."

Prevention wording:

"The Partner will take all reasonable and adequate steps to prevent any non-compliance by its employees, consultants and other implementing partners with the survivor-centred, trauma-informed approaches to activities involving the gathering and use of SCRSV information, and to respond appropriately when reports of non-compliance arise. The Partner will apply the minimum standards set out in the Murad Code."

Adherence wording:

"In relation to any project activities relating to the gathering or use of information about SCRSV/SV or its survivors, the Grantee shall explicitly and systematically adhere to the principles set out in the Murad Code. As part of its regular reporting, the Grantee shall report on the application of the above standards using gender-sensitive indicators and sex-disaggregated data."

"The Organisation shall comply with the minimum standards related to gathering and using SCRSV information, as set out in the Murad Code during the term of this agreement."

"The Recipient acknowledges that it has rules and policies to adequately implement internal controls, in regard to the minimum standards for the gathering and use of SCRSV information captured in the Murad Code."

"The Grantee declares and guarantees that it has in place, and shall maintain in place for the duration of the Agreement, a publicly available Code of Conduct in relation to the gathering and use of SCRSV information and any interaction with SCRSV survivors. The Code of Conduct will be integrated across the Grantee's operations and shall, at a minimum, include the minimum standards set out in the Murad Code."

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Compliance and safeguarding notification under the grant contract: Grant agreements also include notifications to the partner relating to compliance and safeguarding allegations. Given that the Code reflects minimum standards for safe, ethical and effective information-gathering and use, failure to meet these standards can lead to a safeguarding issue (see Phase 3).

CASE STUDY

Safeguarding issue arising from Murad Code non-compliance

> Non-compliance with the Code's minimum standards can create serious safeguarding risks for survivors. The failure of the International Criminal Tribunal for Rwanda (ICTR) to give survivors full information about the process of testifying exposed them to multiple forms of harm. Witnesses were promised confidentiality but were not informed that court rules required disclosure of their identities to the defence. In many cases this resulted in their names being leaked within their communities. When the issue was raised with the witness management team, the head responded, "If we tell them this, they won't testify for us." [10]
>
> Following their participation in the trials, survivors reported having varying levels of threats directed at them upon returning home. Beyond direct reprisals, survivors experienced family breakdown and social abandonment. One survivor who had testified on the promise of confidentiality was exposed as a rape victim, leading to her fiancé abandoning her. The stigma attached to being a rape victim meant that many women who agreed to testify had not notified their families or partners that they were raped during the genocide, making the exposure of their identities particularly devastating. For many of these survivors – often widows living alone and already vulnerable to violence – their ability to rebuild their lives in post-genocide Rwanda was dependent on their marriageability.

Funders can adjust their safeguarding notification provisions to specifically reference the Murad Code, or specific Code wording could be included, especially if there is adherence wording in the grant agreement in relation to the Code.

10. United Nations Research Institute for Social Development (UNRISD) Occasional Paper, Binaifer Nowrojee, "Your Justice is Too Slow" Will the ICTR Fail Rwanda's Rape Victims? (November 2005), *https://bffrepositorio.unal.edu.co/server/api/core/bitstreams/76e6a667-40d2-4451-bd21-69cb9abf33a7/content*.

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EXAMPLE NOTIFICATION WORDING

"The Participants will immediately and without undue delay inform each other of any event which interferes or threatens to materially interfere with this Arrangement, including credible suspicions of, or actual safeguarding issues including reports of harm arising from a failure to meet the minimum standards set out in the Murad Code."

"When the Partner becomes aware of suspicions or complaints of harm arising from non-adherence with the Murad Code, the Partner will take swift and appropriate action to stop harm occurring, investigate and report when safe to do so and after considering the wishes of the survivor, and put in place effective measures to avoid recurrence. The Partner will also promptly inform the Grantor of the suspicions or complaints and the outcome of the investigation."

"The Organisation should also report any credible suspicions of, or actual incidents that would be of significant impact to their partnership with the Grantor or the reputation of the Grantor. For example, credible allegations of harm arising from non-compliance with the standards set out in the Murad Code, must be reported within 48 hours."

Budget negotiations and finalisation: Funders can also ensure that the budget lines and resources are allocated in a way which encourages good practice and supports Murad Code adherence. Annexed tool E sets out guidance on Murad Code budgeting, which should support budget negotiations and finalisation. Budgets, and their application in practice, also need to have flexibility in line with the Code (e.g. allowing for flexible methodology for individual survivors, for risk assessment reviews and adaptive mitigation measures), and to enable adaptation to local settings and survivor realities, which are often fluid.

Focus on preparation: Depending on the internal capacity and approach of the funder, orientation could be offered to partners at the outset of the project to support partners to uphold Murad Code commitments under the preparation and implementation principles. This could be done in conjunction with the resources available on the ***Murad Code project website*** or by soliciting the input of SCRSV experts or other partners.

5.1 Prepare first*: We will undertake thorough planning and risk assessments, and ensure that the necessary knowledge, capacity, team, policies and procedures are in place before we start gathering information, especially before any engagement with survivors. This is a critical foundation for respecting survivors' rights, and for safe, accessible, ethical and effective outcomes.*

When finalising agreements, funders must also clarify their expectations that partners operate in a manner that is responsible, upholds integrity, and specifically does not exploit or disempower survivors while gathering and using their information. It is important to ensure that those implementing the projects understand the funder's expectations around the standards in the Code, and what actions the funder might take if the partner fails to uphold the standards (see more in the following section).

Deliverables and indicators: Development and review of deliverables before finalisation of the grant agreement should include at a minimum a check that they will not drive bad practice, for example by: removing any unnecessary focus on numbers of survivors to be engaged or number of instances of SCRSV to be researched or documented; adjusting any unrealistic timescales; and removing any pre-determined or pre-assumed outcomes for survivors when survivors can and should be involved in the process of design, making decisions, etc. Indicators can be an effective way of encouraging progress, development and reporting on survivor-centred practice and Murad Code integration. It is vital

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that for any monitoring and evaluation aspect, survivor-centred, trauma-informed, Code-compliant data-collection methods are used. There should be a focus on qualitative indicators and beneficiary feedback/change stories. There are also useful existing banks of indicators which could be adapted to Murad Code specific projects.

9.6 Prioritise safety and quality over quantity: *We will not compromise quality, safety or well-being based on pressure to conduct a certain number of interviews.*

Deep dive: quantitative targets as drivers of bad practice

Targets in project reporting which focus on "numbers of survivors" or "numbers of cases of SCRSV/" can lead partners to stage visits, push survivors into uncomfortable situations or even manipulate data to meet expectations. Funders should avoid creating pressure to "achieve high numbers" and instead emphasise the quality and ethics of engagement. Quantitative targets, if used at all, should be exceptional, clearly justified, and paired with strong risk-mitigation measures. Funders must also refrain from demanding or supporting the collection of unnecessary identifying details, sensationalising the issue, and respect survivors' autonomy over their history, identity, and image.

Clarify reporting formats: Funders should develop reporting formats that include clear avenues for partners to demonstrate how they are integrating the standards in the Code and how they are applying survivor-centred approaches. Additionally, funders should maintain open lines of communication that allow partners to share the specific challenges and restrictions they are managing in a transparent fashion, to reassure partners that they are learning together and have the same goal of supporting SCRSV survivors. It is also important to recognise the need for flexibility in reporting and project data for specific groups and in specific security contexts. Partner reporting should recognise confidentiality and privacy rights of survivors, including redacted or deidentified information, and ensure data collection methods are safe and ethical.

REPORTING TEMPLATE EXAMPLES

Reporting on progress around implementing the minimum standards in the Murad Code could be built into existing sections of regular reporting templates. For example:

Risk: What challenges or constraints did you face in implementing this project in relation to upholding the Murad Code? Were these challenges anticipated prior to project implementation? How were these challenges addressed? Based on experience with this project, what measures would you take to address risks in the future for similar initiatives?

Success: Describe the major successes of the project in relation to survivor-centred approaches and the integration of the Code. Were there any unanticipated benefits/outcomes? For projects that tested innovative approaches, were these successful? Could they be replicated in other projects? Would you do anything differently? Describe the impact that the application of the Code/development towards integration of the Code has had in the project?

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Gender considerations: How has the project acknowledged and addressed the different needs of women, men, boys and girls? If the project was specifically aimed at gathering or using SCRSV information, please explain how it addresses and incorporates the minimum standards of the Murad Code across the gender spectrum? Were they developed as outlined in the proposal plan? If not, please explain why not and what impact this had on the project.

Describe the measures taken to ensure that the interests/needs of women, men, girls and boys were addressed. Please consider the following:

- **Planning:** What gender inequalities were recognised within the context of the project and how were they addressed within the project using the Murad Code?
- **Implementing:** How were the needs/interests of women, men, girls and boys addressed by project activities and through the integration of the Code?
- **Evaluating:** How did integrate of the Code benefit women, men, girls and boys? Provide concrete examples/indicators.

Understanding the need for flexibility: While this becomes most relevant in Phase 3 during the implementation process, building in flexibility in the project documents/framework can be an extremely important preparatory step. Conflict and crisis settings are often extremely fluid. That in itself means that both the funder and the partner should be ready to adapt to the changing realities, risks and needs. Importantly, for survivors (and survivor engagements), their situations can also change over time, requiring adaptation of tailored individualised approaches. The guiding priorities should be safe, ethical and effective approaches, and allowing for adaptation to uphold those priorities – the project agreement and reporting frameworks should facilitate this, not drive bad practice by shackling everyone to fixed rigid deliverables and budget lines.

1.1 Adapt to survivor's individuality: *We respect that each survivor is unique. We will tailor our approach to their specific identities, characteristics, groups and contexts, such as their age, gender, evolving capacities, resilience, relationships with and connections to others, socio-economic and political situation, and the discrimination they face. We recognise that such elements change over time and context and that our approach may have to be adjusted accordingly.*

5.2 Ensure flexibility for survivor choices: *We will develop a methodology and team which are as flexible as possible to support survivors' choices about how to engage with us, where, and with whom (gender, age, affiliation, etc.).*

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KEY ACTIONS

21. (External) Convey information about the funder's policy and spell out what will happen if partners violate minimum standards in the finalisation of the agreement process.

22. (External) Agree with partners about the need, if any, and related criteria and procedures, for engagement with survivors for reporting and communications purposes.

23. (Internal) Develop monitoring and reporting formats that:

    - focus on measuring progress against strategic goals, especially focusing on the quality of engagements
    - explicitly exclude detailed or identifying information about individual survivors
    - reduce pressure for high numbers of cases in reporting, do not request identifying information about survivors or focus on graphic details of incidents
    - generally value reporting which encourages and enables partners to report on the quality rather than the quantity of information and any engagement with survivors. Reflect this in your reporting templates.



Tool: Example wording suggestions for reporting templates (see *page 33*)



Further reading: Synergy for Justice: *Stigma in Justice Toolkit Part A* includes indicators around survivor-centred engagement and interaction in justice process which could be adaptable to other information-gathering and use activities.

PHASE 3: POST-AWARD AND MONITORING/ IMPLEMENTATION

This third phase of the funding process is where funders move into monitoring and support as partners begin their programming.

During the implementation phase, funders often engage in ongoing monitoring to assess progress, provide technical support and adjust delivery strategies as needed. Monitoring may include regular check-ins with partners, reading and giving feedback on progress reports, conducting site visits, and supporting capacity-strengthening efforts.

There are three key opportunities to incorporate the Code's standards during this phase:

1. **Project start-up, preparations and sub-grants**, which includes selecting sub-grantees and finalising sub-grant contracts, capacity-building and detailed preparations, including any individual survivor engagement.
2. **Ongoing monitoring to assess progress, providing any technical support for information-gathering and use, and adjusting strategies as needed.**
3. **Supporting capacity-strengthening for partners.**

PHASE 3: STEPS IN DETAIL

The steps in this phase are outlined in more detail along with key actions funders can take to incorporate the Murad Code.

1. PROJECT START-UP AND PREPARATIONS

While this phase of the project and funding cycle moves focus to the grantee, who now must begin the hard work of setting up and delivering the project, there are ways which the funder can influence, set expectations and monitor.

Selecting partners and signing sub-grants: Funders can include expectations or a requirement that any sub-grant or implementing partner downstream is based on the principles of 'equitable partnership' described earlier (Phase 1). This component is also an opportunity to set parameters for capacity-building and supported development of sub-grantees (often community-based organisations), and funders can specifically encourage inclusion of such support by the grantee as part of project deliverable and indicators. For example, some large INGOs do not set pre-conditions for Code compliance in their sub-grants but rather adopt a collaborative development and support approach with their partners, which includes discussion and co-design around challenges and needs, and how support and capacity-building can be built into the sub-grant, along with indicators.

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EXAMPLES OF FORMAL SUB-GRANT WORDING

Adherence: Some organisations now include a clause in their sub-grants which require adherence to the Murad Code and annex a copy of the Code to the agreement.

Expectations and focused provisions: e.g. IMPACT: Center against Human Trafficking and Sexual Violence in Conflict, *IMPACT Integrity Protocol (9 May 2023):* "project partners commit to and behave in compliance with this Protocol and integrity/ethical protocols that apply to working with survivors, such as (for CRSV) the Murad Code". Sub-grant provisions include that the partner ensures that "information from survivors is handled in line with the Murad Code," and requires them to ensure they have a complaints system for reporting and a procedure in relation to violations.

Detailed preparations: While delivery of this phase is in the domain of the partner, funders should expect (in terms of activities, budgeting and early reporting) that this phase includes affected community/survivor network engagement (if not done in design) and informed risk assessments to ensure flexible, safe methodology protocols and procedures are in place.

5.2 Ensure flexibility for survivor choices: *We will develop a methodology and team which are as flexible as possible to support survivors' choices about how to engage with us, where, and with whom (gender, age, affiliation, etc.).*

5.3 Assess and mitigate risks*: Based on knowledge and understanding of the context, we will identify and assess any potential risks for all those involved, such as individual survivors, their family and communities, ourselves, and others involved in the process. We will assess general and specific risks for individuals and situations, such as confidentiality, safety, well-being, social repercussions and stigma, and legal rights. We recognise that this process should be informed by those competent in aspects such as gender, children and communications, and data, physical and other security. If we proceed to work with individual survivors, we will also seek a survivor's input on their risks. We will not proceed if the risks cannot be appropriately mitigated. This assessment and its mitigation measures will guide every aspect of our work. We will review the assessment as often as necessary.*

Capacity-building*:* Funders should expect and be looking for finalisation of team selection/recruitment to ensure competency and flexibility (genders, context experts, etc.), team briefing, project familiarisation/induction trainings, and capacity-building of the team and sub-grantees on survivor-centred protocols and practice.

7.3 Select the right team and partners*: We will build a team (including interpreters, intermediaries, guides, fixers) and select partners and others acting on our behalf who share our commitment to this Code. We will also consider the diversity, representation, confidentiality, safety and flexibility implications of these selections.*

5.10 Brief your team and partners*: We will brief and monitor our team and those acting on our behalf (including any partners) on our preparations and on safe, ethical and effective processes to adhere to this Code.*

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Funders can further contribute by convening spaces where all partners come together to deepen their understanding of the standards, exchange good practices, and build collective solutions to common challenges. In addition, funders should support partners' ability to share their findings more widely—by funding opportunities for partners, especially women-led and other survivor organisations, to present their work at conferences and forums. These efforts not only strengthen compliance with minimum standards but also build visibility, credibility, and leadership within the broader sector.

When organisations cannot yet fully implement the Code in their information-gathering and use, funders can help bridge gaps by funding capacity-building and linking partners to expert resources. Capacity-strengthening, provided by SCRSV experts, should extend beyond one-off trainings and could include providing mentorship and supervision, so frontline staff receive feedback and support needed in challenging environments. Funders can also support partners to adopt written protocols on confidentiality, informed consent, and referral pathways.

Reaching out to external specialists

Small local organisations who usually are on the frontline of response to SCRSV survivors, often do not have access to resources such as technical experts or supervision.[11] From 2017 to 2025, the GBV Area of Responsibility, with funding from the US government, supported a virtual community of practice to provide technical assistance through peer support to GBV specialists around the world. They also supported a pilot project to provide virtual supervision from a trained psychologist to frontline workers who mostly worked in remote, difficult settings.

International NGOs also have reached out to experts to fill gaps in capacity. For example, MSF maintained a relationship with the Netherlands Association of Psychologists who would send psychologists to MSF projects pro-bono to support front-line workers to provide training on new techniques for talking to survivors or to debrief after critical incidents.

KEY ACTIONS

24. (External) Ensure follow-up monitoring of sub-grants based on equitable partnerships.
25. (External) Early reporting of activities should demonstrate community consultations (if relevant) and tailoring of approaches to attuned, individualised risk assessments.
26. (External) Look for induction/team briefing and capacity-building prior to any activity start-up.

11. Supervision is provided from a trained professional to regularly support staff who provide psychological help to GBV survivors. It gives these staff a safe space to reflect on their work, manage stress, and strengthen their skills. Working with survivors can be emotionally heavy, and without support, staff may feel overwhelmed or make mistakes. Good supervision protects both the well-being of staff and the quality of care that survivors receive.

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27. (External) Support capacity-strengthening actions such as:

- invest in technical capacity for partners who need additional support to meet minimum standards by funding these support lines in their projects or funding technical strengthening sessions with a group of partners (e.g. databases, data management systems, staff training)
- convene learning spaces and support mentoring where all partners can deepen their understanding of minimum standards, exchange good practices, and co-develop solutions
- support visibility and dissemination by funding partners—particularly survivor and women-led organisations—to present their findings at conferences and sector forums
- strengthen credibility and leadership by ensuring partners have the resources and platforms to engage with broader networks and influence sector-wide dialogue.

Further reading: IICI, *Murad Code Competency Framework and Assessment Tools* publication (includes professional development resources for each competency

2. ONGOING MONITORING TO ASSESS PROGRESS, PROVIDE TECHNICAL SUPPORT, AND ADJUST STRATEGIES AS NEEDED

Monitoring can include regular check-ins, progress reports, site visits and capacity-strengthening efforts.

Recognising red flags and non-compliance concerns: One of the most reported problems in relation to SCRSV information-gathering is an emphasis on survivor numbers. There are clear red flags if partners' reporting or practice focuses on large numbers of survivor interviews, particularly over short periods of time. Funders can reinforce key messages on this issue through ongoing communication and the reporting format where funders focus on monitoring the quality of any survivor engagement over the quantity of engagements.

In addition, funders should be concerned if they receive or see publication of identifying information about survivors and become aware of practices that seem to unnecessarily probe and focus on the explicit or graphic details of a SCRSV incident. Funders should support partners to treat survivors as individuals with autonomy over their information rather than sensationalise their information. It is important for funders to reinforce messages and ask questions about confidentiality measures, as well as ensure documented informed consent, throughout this phase.

Responding to bad practice: Funders should have policies and guidance on what to do if they discover a partner is not adhering to the minimum standards (see Phase 1). The finalisation of agreements provides an opportunity to clarify how non-compliance with minimum standards (and obligations regarding other important elements such as safeguarding and anti-fraud measures) will be handled, including notification requirements (Phase 2). If during implementation, the funder identifies that the partner is not upholding the commitments distilled in the Code, the funder should decide on its course of action. This may involve different levels of response, depending on how egregious the violation is, including:

- requiring an investigation or root-causes exercise and report with recommendations, including engagement of an external expert to conduct or facilitate that work

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- providing technical support to or permitting existing fund reallocation for the partner to address potential issues (e.g. redirecting funds to an upgraded security system)
- requiring the partner to secure external support where they lack capacity (e.g. redirecting existing funds or using own funds to provide a training for staff)
- if the partner does not demonstrate progress, funders should consider whether funding for SCRSV information-gathering and use should be paused and removed from their programme plans.

Note: Funding for life-saving survivor response services (such as medical or psychosocial support) by the grantee should not be negatively impacted by such measures unless the partner's provision of care is or reasonably seems to be harming survivors.

Many funders may be reluctant to take such steps. Ensuring that no survivor is harmed while their information is gathered is of paramount importance to gathering the information. It is a safeguarding issue, and most funders already have safeguarding responses in place.

3.5 Do not exploit survivors: *We will not be extractive, instrumentalising, exploitative, abusive, harassing or take advantage of survivors and their information. We will take measures to prevent and respond to any form of revictimisation, sexual exploitation or abuse.*

3.8 Be accountable: *We will be transparent and accountable against the commitments reflected in this Code. We understand the potential harms to a survivor, their family and community if we fail to do so. We acknowledge a survivor's right to complain, including to others, about our work, and we will listen when they wish to complain directly to us. We will be open to feedback to improve our work.*

5.3 Assess and mitigate risks: *… We will assess general and specific risks for individuals and situations… We will not proceed if the risks cannot be appropriately mitigated. We will review the assessment as often as necessary.*

As with all safeguarding issues, funders must grapple with the implications of sharing or publishing findings (legal, ethical, psychological, revictimisation, etc.) which would put other actors on alert and notice to these serious issues. It is important to situate decisions on Murad Code non-compliance within your existing safeguarding protocols which will set protocols and parameters for reporting, sharing or publishing information depending on the nature of the conduct in question.

Site visits by funders

Funder visits to projects can unintentionally cause serious harm to SCRSV survivors if they are not carefully planned. In the past, there have been many examples of survivors being pressured to meet visiting delegations and recount traumatic experiences, sometimes even in highly public or formal settings. Male funders have visited women- and girl-only spaces, compromising their effectiveness. Such encounters often re-traumatise survivors, compromise confidentiality and reduce their experiences to "evidence" for funding or political validation.

Site visits have also exposed the locations of shelters or safe houses, putting survivors at risk from perpetrators or fuelling stigma within communities. In some cases, women who met with funders were later targeted or ostracised, accused of seeking favours or bringing "shame" by speaking out.

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> Even when well-intentioned, requests to "hear from survivors directly" can reinforce extractive dynamics that prioritise donor agendas over survivor well-being.

Funder visits: If planning visits to a partner, funders should review the Code prior to the visit and reflect on how to apply the principles in relation to their visit. This should include, but is not limited to, not insisting on, requesting or agreeing to offers by partners to speak with survivors, and understanding relevant data privacy and security protocols. See Annexed Tool G for related tips.

8.1 Look for SCRSV information which is not from or about survivors: *We recognise that useful information about SCRSV is not always from or about a survivor. We will seek to collect and use such information about SCRSV from wider sources (such as statistics, expert reports or analysis, and perpetrator information) as this information poses less risk for survivors and can mitigate over-reliance on survivor information.*

KEY ACTIONS

28. (External) Regularly review and discuss progress with partners. Use the commitments in MC Principles 9 and 10 to guide inquiries into how information-gathering and use is implemented.
29. (Internal) Discuss and be prepared to implement the relevant policies in response to a partner not adhering to the minimum standards.
30. (Internal) If planning site visits to a partner, review the Code prior to the visit and reflect on how the principles apply. This includes but is not limited to, not insisting or requesting to speak with individual survivors, and being respectful of data privacy and security protocols.

Tool: Annexed Tool G: Tipsheet: Conducting Funder Monitoring Visits to Programmes Documenting SCRSV

3. COMMUNICATIONS

Harmful approaches to gathering and using survivor information often originate inside funder organisations, including with communication teams whose wish to generate interesting ways to explain the work that is being funded can lead to unethical photography/video footage use or taking survivor's testimonies out of context.

When funders' communications teams share information about SCRSV projects, they must prioritise survivor dignity, safety and agency above all else. A solid understanding of sexual violence, stigma and how such work can cause harm is required. No images, stories or personal details should be used without informed consent, and information must never put survivors at further risk of harm, stigma or traumatisation. Communications should avoid sensationalism and instead focus on respectful, accurate and survivor-centred narratives that highlight resilience, rights and justice.

3.3 Do not stigmatise: *We will examine and confront our own limitations in understanding perspectives and experiences beyond our own; our own biases, fears, trauma and triggers; and our own attitudes, prejudices and assumptions in relation*

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to sexual violence and survivors. We will not convey any message to survivors (through our tone, words, body language or other actions) which blames, shames, further harms, judges, belittles, patronises, ridicules or disrespects them. We also will not present or publish any information about them which could do this.

10.8 Do not ask if you do not need to: *We will not ask questions or probe for explicit, sensitive or graphic details of sexual violence where we do not specifically need this for our purpose. If we need this type of information, we will explain why to the survivor and will respect their decision whether to answer or not. We will also not fixate on or sensationalise such details when representing or reporting a survivor's experience.*

KEY ACTIONS

31. Ensure communication teams have Code competencies and awareness of the risks and harms that can come from communicating and publishing information about SCRSV and its survivors.

    Further reading: IICI, *Murad Code Competency Framework and Assessment Tools*, Competency 10 Responsible Use of Information

32. Create a system of communication and publication review prior to sharing or publication, and consider using external experts if there is not internal expertise.

PHASE 4: PROJECT CLOSURE

The final phase of the funding process, project closure, is both a reflective and forward-looking phase that helps inform future grant-making strategies and deepen long-term impact.

As the grant period ends, this phase includes some opportunities for funders to gather data, learn lessons and promote the standards and principles distilled in the Murad Code including:

1. **Analysing final evaluations of outcomes and lessons learned and communicating with others, which will feed into a Phase 1 review of strategic priorities, and potential additional grants or extensions, etc.**
2. **Using formal closure processes to ensure responsibility and ethical continuity and legacy provisions, including confidentiality in archiving survivor testimony and storage of information gathered during projects.**
3. **Exploring opportunities for continued partnership, adjustment of approach or models, or scaling-up of successful models.**

PHASE 4: STEPS IN DETAIL

The steps in this final phase are outlined in more detail along with key actions funders can take to incorporate the Murad Code.

1. ANALYSING FINAL EVALUATIONS OF OUTCOMES AND LESSONS LEARNED

The final project report often is a financial exercise to close the books and lacks a thoughtful reflection of how the organisation implemented the Code in challenging environments. By including a section on the outcomes and lessons learned in the final report template, funders can incorporate space for the partner to reflect on the progress, as well as challenges, in applying the standards in the Code to their work.

Final evaluation formats: Final evaluations should include questions and attention to whether and how the partner has adhered to the minimum standards. Suggested reporting format language introduced in Phases 2 and 3 could be expanded or extended into a full project review, lessons learned and an overall evaluation. It may also be of interest to document how the funding has supported the further development of SCRSV systems and institutional capacity that supports the partner's future work. The evaluation should also capture areas or specific practices which were more challenging in the context and explain how the partners managed it. This information can help funders to better understand the operational context in which SCRSV information-gathering and use is occurring and apply lessons learned in its other programming. Given final evaluations' importance, some funders may want to secure external evaluators or support to help them develop formats that effectively assess adherence to the standards in the Code and/or conduct final evaluations directly with partners.

Necessary action if standards are/have been violated: If during the final evaluation and reporting, it is evident that the partner has not adhered to the minimum standards, the funder should consider taking responsible action including:

- communicating to the partner which findings have gone against the stated expectations of the funder and making recommendations for how to address the gaps
- if the actions are egregious and were not addressed during monitoring, the funder should be prepared to engage its safeguarding protocols and responses, which may include sharing high-level concerns about the partner with other funders (if this

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information is available), publishing or reporting criminal conduct with law enforcement. If there is evidence of harm committed to survivors, such steps are necessary to halt or reduce further harm against survivors. The funder must be transparent with the partner and let them know they are taking this action.

KEY ACTIONS

33. (External) Structure the final report to provide space for the partner to reflect on how they have adhered to, as well as experienced challenges, in applying the Code to their work.

2. ONGOING MONITORING TO ASSESS PROGRESS, PROVIDE TECHNICAL SUPPORT, AND ADJUST STRATEGIES AS NEEDED

Given the sensitivities around SCRSV information-gathering and use, it is important for funders, building on foundational work done since the start of the project, to encourage formal project closure processes. When the funding ends, partners should ensure safety for survivors who consented to sharing their information. Partners should develop exit and archiving strategies well before the project closes (and their approved project budgets should fund this work). This process should include attention to maintenance of communication pathways with survivors for any follow-up that may be required post-grant, access and sharing protocols of confidential information, and attention to data management and securing sensitive information.

The current reality is that there is insufficient attention given to this aspect of SCRSV information-gathering and use, so funders should consider supporting convenings to establish common ethical frameworks that will support better archiving of sensitive information.

Archiving sexual violence data: risks and lessons

Archiving SCRSV data raises serious ethical, political and legal challenges. Survivors often share testimony under assurances of confidentiality, yet once recorded, these accounts may be repurposed, exposed or demanded by authorities or others, including CSOs, in ways that undermine safety and informed consent. Even anonymised data can sometimes be re-identified, particularly in small or conflict-affected communities. Without careful governance, archives risk eroding trust, re-traumatising survivors and turning sensitive testimony into a political or legal weapon. The Code contains clear standards about data minimisation, information-management, consent and information-sharing.

Examples from practice highlight the dangers. In Iraq, the UN withheld sexual violence files from the government after the UNAMI mission ended, fearing misuse of data and reprisals. In Nepal, weak protection by transitional justice commissions left survivors vulnerable to stigma and intimidation. In Bosnia and Herzegovina, testimonies were handed to courts without survivor consent, re-traumatising some women whose stories surfaced in proceedings they had not chosen to enter. Similar dilemmas arose in Guatemala, where historic police records exposed survivor identities, and in Timor-Leste, where truth commission archives left survivors with little control over future use.

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These cases illustrate the lesson that collecting and archiving SCRSV data is not a neutral act to be quickly implemented and handed over. Without clear survivor-centred safeguards, secure custodianship, and limits on secondary use, archives meant to advance justice, or knowledge can instead create fresh risks and harms to survivors.

Before final closure, confirm that the partner is properly maintaining and managing important post-grant systems and processes, including regarding the withdrawal of consent by survivors, and managing and protecting confidential information.

7.8 Build confidentiality protections: *We will put in place confidentiality protocols and measures to protect the survivor's information, privacy and safety, including taking special care to ensure the security of any digital communications, data management and storage.*

2.10 Honour withdrawal of consent: *We will make survivors aware of their right to withdraw consent at any time during or after the process (including during any interview), and of how they can notify us of that withdrawal. We will be clear about what we are able to do upon withdrawal of consent and what we have limited control over. If consent is withdrawn, we will take the steps we said we would.*

KEY ACTIONS

34. Discuss and support strategies and mechanisms for ongoing data protection, upholding confidentiality and informed consent.

35. Encourage lessons-learned and collaborations which capture better practice guidance for legacy archiving and data protection, with survivor control mechanisms (or consent expiry dates).

3. FUNDERS MAY ALSO EXPLORE OPPORTUNITIES FOR CONTINUED PARTNERSHIP, ADJUSTMENT OF APPROACHES OR SCALING OF SUCCESSFUL MODELS

The end of project funding is also an opportunity for funders to explore opportunities for continued partnership (with adjustments if necessary) or scaling-up of successful models. Recognising that SCRSV information-gathering and use is often not a time-limited endeavour and that survivors can come forward at any time after the event, providing long-term or on-going funding to partners is essential. It may also be useful to discuss and support partners in planning to maintain their ability to continue SCRSV information-gathering and use programming. This can include working to bridge the gap in funding with other funders or finding alternate funding mechanisms.

Funder reflection: Once funders receive final reports and close out projects, it is a good time to pause and reflect on how the project performed against the funding strategy and re-evaluate the funder's added value to the wider field. Funders should also consider whether their internal systems and approach adequately support partners to adhere to the standards distilled in the Code (See Phase 1, Key Actions 6-9). This may take the form of internal reviews about if and how to fund such work again, reflections on their strategy and re-evaluating the added value of their funding of such work

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(feeding into Phase 1 reviews of priorities and funding strategies). This may include reflections on where partners are in the process of application of the standards in the Code and considering how the funder might support the wider field to improve its overall adherence to the standards.

Funders should consider how they can share their learning, approaches and experiences with other funders who support or may support SCRSV information-gathering and use. This can happen in formal or informal funder coordination settings, donor conferences or through funder and philanthropy publications. As necessary, such meetings can be held confidentially.

Unless funders work together to encourage and support survivor-centred and effective work and to set in place effective measures that prevent information-gatherers and users who do not adhere to the minimum standards from securing funding for such work, harmful and ineffective work will continue.

When completing internal reviews about if and how to fund such work again, funders should explore how successful models can be scaled up or applied in other contexts. In addition, funders can ask, 'did we add value?' or 'what did we learn about how to add value?'

4.5 Will we add value?: *We will reflect honestly on what added value or benefit our work or actions can bring to survivors. We will discuss these with survivors. We will only proceed if there is such an added value from our work. We recognise that some survivors are motivated by added value that our work might bring in terms of their families, communities or groups.*

A review of how the drivers of good and bad practice influenced the project is also an invaluable analysis to help ensure more positive, impactful funding through funding cycles.

4.7 Challenge drivers of bad practice: *We will critically test any pressure or justifications of 'urgency', 'public interest', quantitative targets, 'prevention' or any other such motives to proceed where we cannot do so safely, effectively and ethically.*

KEY ACTIONS

36. (Internal) Reflect on rationale for funding and re-evaluating funding strategies and added value.
37. (External) Identify specific areas where future support could address capacity needs in relation to Murad Code compliance.
38. (External) Share findings on how to strengthen the implementation of the Code with other donors and partners.
39. (External) Fund partners to share their experiences in conferences and workshops to improve the knowledge of the sector.

CONCLUSION

The Murad Code was developed in response to survivors' calls for more ethical, respectful, and coordinated practices in the gathering and use of information about SCRSV. Survivors have made clear that harmful approaches not only undermine their dignity and agency but also weaken the credibility and effectiveness of the broader response. Funders are uniquely positioned to encourage, support and require survivor-centred and effective information-gathering and use work by their partners.

By embedding the Murad Code into funding frameworks, prioritising survivor-centred standards, and incentivising coordination and accountability, funders can play a decisive role in shifting the culture from extractive to ethical. Their choices can ensure that the collection and use of survivor information do not re-traumatise or exploit, but instead contributes to outcomes such as recognitions, protection and justice.

This Guide is a call to action: funders must recognise and embrace their influence with sensitivity, align resources with ethical principles, and work with partners to ensure that survivor safety, dignity and agency are at the heart of every effort to document and respond to SCRSV.

METHODOLOGY

Using networks established by the Murad Code project team, Ariadne, and their own professional contacts, the authors of this Guide compiled a comprehensive database of over 100 relevant stakeholders to interview as part of the development of this guidance. These contacts were categorised into primary and secondary priority tiers for outreach with an original focus of the research on donor institutions. Interviews were conducted with key donors with the aim of better understanding the types of SCRSV-related programmes that they support, the guidance they currently provide to grantees or partners, and their perspectives on how best to encourage adherence to safe and ethical practices.

The scope of interviews was intentionally broadened over time to include representatives from civil society and INGOs. This adjustment aimed to capture the perspectives of actors situated on the receiving end of donor-partner relationships, offering a more balanced and comprehensive understanding of engagement dynamics.

In collaboration with the Murad Code project team, the authors developed a semi-structured key informant interview guide. This tool was used to ensure consistency across interviews while allowing for flexibility to explore context-specific insights.

Between December 2024 and April 2025, a total of 28 key informant interviews were conducted with the objective to gather qualitative insights into current practices, challenges, and emerging needs related to donor engagement in the context of SCRSV. Emphasis was placed on understanding how the Murad Code is being—or could be—integrated into funder -grantee partner relationships, funder's internal systems, and processes.

Participants were drawn from a diverse range of institutions, spanning five key sectors:

- Government donors (5 interviews): Interviews were conducted with representatives from five high-income countries. Three government donors either declined or did not respond to the request for participation.
- Private foundations and philanthropic organisations (5 interviews): Participants included representatives of mid- to large-scale philanthropic institutions engaged in funding for gender justice and human-rights initiatives.
- United Nations agencies and affiliates (7 interviews): This category encompassed personnel from both headquarters and field offices, including individuals with past or current responsibilities related to gender-based violence (GBV) and SCRSV.
- Civil society and independent experts (8 interviews): Respondents in this group represented a wide range of organisations, including survivor-led initiatives, research and academic institutions, and technical or advocacy organisations. These included actors based in or working on SCRSV in Ukraine, the Democratic Republic of Congo, Myanmar and Bangladesh.
- Academic researchers (3 interviews): Academic researchers from Europe, Asia and North America who focus on CRSV against women and men in Myanmar, Timor Leste, Uganda, the Balkans, the DRC, Syria and other countries were interviewed.

Following the interviews, consultants responsible for the drafting of this Guide independently reviewed and analysed the interview notes. Key themes and insights were identified and synthesised into a preliminary analytical framework. This framework informed the focus of subsequent interviews and provided the foundation for thematic analysis and reviews of the Guide.

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IICI Institute for International Criminal Investigations

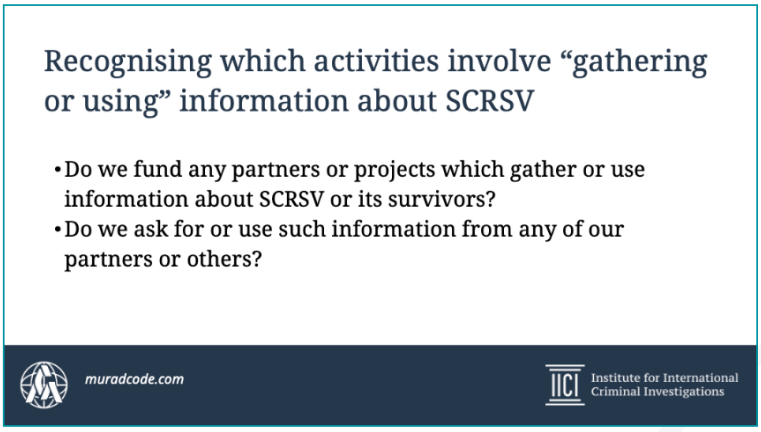
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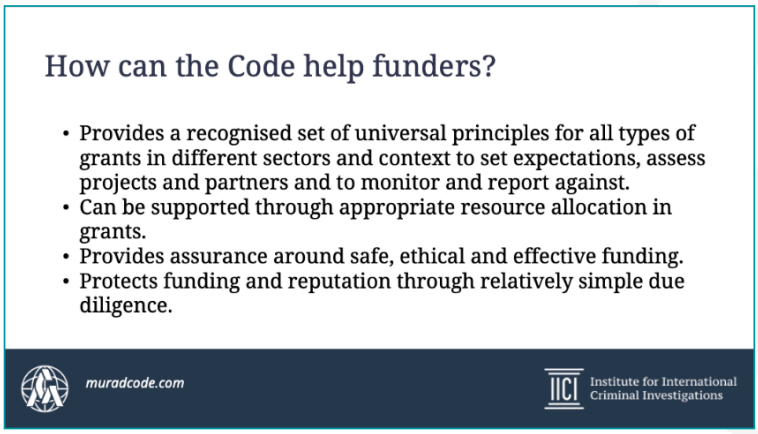
ANNEXES: TOOLS

A. INTRODUCTION TO THE MURAD CODE FOR FUNDERS: ON-BOARDING PRESENTATION

A set of slides with notes can be adapted for each audience (preview of first few slides below), which is available at the *resources page of the Murad Code project website*. These are three opening slides from the on-boarding presentation for funders which can be found at the mentioned page.







B. OUTLINE OF THE MURAD CODE

This *outline* also is available in other languages on the Murad Code project website.

OUTLINE OF *GLOBAL CODE OF CONDUCT FOR GATHERING AND USING INFORMATION ABOUT SYSTEMATIC AND CONFLICT-RELATED SEXUAL VIOLENCE*

("THE MURAD CODE"), APRIL 2022

Please consult the full Murad Code, including its foreword, at www.muradcode.com/murad-code. This extract only reflects the headings of the 10 principles and 86 minimum standards captured in the full Murad Code.

OVERARCHING PRINCIPLES



PREPARATION PRINCIPLES



IMPLEMENTATION PRINCIPLES



OVERARCHING PRINCIPLES

PRINCIPLE 1. UNDERSTAND SURVIVORS AS INDIVIDUALS

- 1.1 Adapt to survivor's individuality
- 1.2 Counter assumptions
- 1.3 Ask the survivor
- 1.4 Prioritise survivor safety
- 1.5 Identify heightened risks
- 1.6 Support access to justice
- 1.7 Respect self-identity
- 1.8 Be inclusive and do not discriminate

PRINCIPLE 2. RESPECT SURVIVOR CONTROL AND AUTONOMY

- 2.1 Avoid approaching survivors unexpectedly
- 2.2 Respect a survivor's choices
- 2.3 Survivor control over their information
- 2.4 Supported decision-making
- 2.5 Decision-making process with children
- 2.6 Reduce pressures
- 2.7 Do not offer benefits in exchange for information
- 2.8 Ensure realistic expectations
- 2.9 Be clear on limitations
- 2.10 Honour withdrawal of consent

PRINCIPLE 3. BE RESPONSIBLE AND HAVE INTEGRITY

- 3.1 Responsibility of information-gatherers
- 3.2 Dignity and respect
- 3.3 Do not stigmatise
- 3.4 Ensure accuracy
- 3.5 Do not exploit survivors
- 3.6 Be trustworthy
- 3.7 Do not damage potential evidence
- 3.8 Be accountable

PRINCIPLE 4. ADD VALUE OR DON'T DO IT

- 4.1 Make responsible decisions
- 4.2 What is our role and purpose?
- 4.3 Are there alternative sources?
- 4.4 Are our intended outcomes realistic?
- 4.5 Will we add value?
- 4.6 Weigh added value against risks
- 4.7 Challenge drivers of bad practice
- 4.8 Minimise exposure risks
- 4.9 Information-sharing
- 4.10 Data minimisation

PREPARATION PRINCIPLES

PRINCIPLE 5. PREPARATION IS THE FOUNDATION	PRINCIPLE 6. KNOW AND UNDERSTAND CONTEXTS	PRINCIPLE 7. BUILD SYSTEMS, COMPETENCY AND SUPPORT
5.1 Prepare first	6.1 Know the context	7.1 Institutional responsibilities and support
5.2 Ensure flexibility for survivor choices	6.2 Understand culture	7.2 Work responsibly as independent actors
5.3 Assess and mitigate risks	6.3 Understand gender	7.3 Select the right team and partners
5.4 Remote interactions	6.4 Understand stigma towards SCRSV and survivors	7.4 Build the right competencies
5.5 Know who else is gathering information	6.5 Identify community dynamics	7.5 Recognise our limitations
5.6 Know about available support	6.6 Recognise individual, compounded and collective harms	7.6 Interviewing child survivors
5.7 Coordinate and cooperate	6.7 Be familiar with laws and practices	7.7 Ensure appropriate support
5.8 Prepare for unexpected disclosure	6.8 Understand appropriate communications and interactions	7.8 Build confidentiality protections
5.9 Enable follow-up	6.9 Minimising negative repercussions	7.9 Continuity and consistency
5.10 Brief your team and partners	6.10 Community-based sustained support	7.10 Manage risks of vicarious trauma

IMPLEMENTATION PRINCIPLES

PRINCIPLE 8. PREPARATION IS THE FOUNDATION	PRINCIPLE 9. KNOW AND UNDERSTAND CONTEXTS	PRINCIPLE 10. BUILD SYSTEMS, COMPETENCY AND SUPPORT
8.1 Look for SCRSV information which is not from or about survivors	9.1 Be ready	10.1 Assess and be alert
8.2 Source representative information	9.2 Reduce time pressures	10.2 Be trauma-sensitive
8.3 Recognise rights and risks from indirectly sourced information	9.3 Create a supportive environment	10.3 Respect personal space
8.4 Verify survivor intention	9.4 Ensure privacy	10.4 Create a safe interview process
8.5 Do not undermine trust in humanitarian services	9.5 Who attends the interview	10.5 Give survivor control over how they tell their story
	9.6 Prioritise safety and quality over quantity	10.6 Ask open questions
	9.7 Understand delayed and partial disclosures	10.7 Contextualise SCRSV
		10.8 Do not ask if you do not need to

C. SAMPLE POLICY STATEMENT: USE OF EXTERNAL EXPERTISE ON SCRSV AND THE MURAD CODE

The Funder recognises that programming, research, advocacy or documentation related to systematic and conflict-related sexual violence (SCRSV) carries heightened ethical, safety and reputational risks. Decisions to fund activities involving survivor engagement, collection of data about SCRSV or dissemination of SCRSV-related information require specialised expertise beyond general safeguarding or monitoring and evaluation capacities.

To uphold survivor-centred values, do-no-harm principles and alignment with the Murad Code, the Funder will engage qualified external expertise when internal capacity may be conflicted or is insufficient to assess, mitigate or manage these risks.

Trigger criteria for engaging external expertise

External expertise on SCRSV and the Murad Code **must be sought** at the proposal, due diligence or implementation phase when one or more of the following conditions apply:

1. **Direct engagement with SCRSV survivors**

   - The proposed activity involves:
   - collection of testimonies, narratives, case studies or qualitative data from SCRSV survivors
   - interviews, focus groups, surveys or participatory research related to sexual violence in conflict or post-conflict settings and other settings covered by the Code
   - survivor-led storytelling, advocacy or documentation intended for public or donor audiences.

   Rationale: Direct engagement increases risks of re-traumatisation, coercion, confidentiality breaches and misuse of survivor narratives.

2. **Collection, storage or sharing of sensitive SCRSV data**

   The partner proposes to:

   - collect personally identifiable or indirectly identifiable information related to sexual violence
   - store, analyse, or transfer SCRSV-related data across organisations, borders or platforms
   - use digital tools, databases or cloud storage for survivor information.

   Rationale: Data protection and purpose limitation for SCRSV information require specialised ethical and technical review aligned with the Murad Code.

3. **Public use or dissemination of survivor narratives**

   The partner's proposal includes:

   - use of survivor stories in advocacy, fundraising, reporting, litigation support or communications
   - publication of reports, media content or campaign materials referencing SCRSV experiences
   - engagement with journalists, filmmakers, researchers or accountability mechanisms.

   Rationale: Public dissemination presents heightened risks of survivor identification, loss of agency and long-term harm.

4. **Limited demonstrable organisational capacity**

   External expertise is required where:

   - the partner lacks documented experience applying survivor-centred or Code-aligned approaches
   - staff training on trauma-informed interviewing and ethical documentation is absent or outdated
   - policies on informed consent, withdrawal, data minimisation or referrals are incomplete or unclear.

   Rationale: Capacity gaps cannot be mitigated solely through contractual clauses or reporting requirements.

5. **Complex or high-risk contexts**

   The partner's activity takes place in:

   - active or recently active conflict settings
   - contexts with weak legal protections, high stigma or risk of retaliation
   - small or close-knit communities where anonymity is difficult to maintain.

   Rationale: Contextual risk significantly affects survivor safety and ethical feasibility.

6. **Information that partner's or Funder's conduct may harm survivors arises**

   - When information arises which suggests that conduct may harm survivors (request external expertise in line with Funder's procedures).

   Rationale: The Funder may be conflicted or may not have the expertise or other capacity to properly consider and advise on a response and/or to conduct an investigation.

Role of external experts

When triggered, external experts may be engaged to:

- review proposals, methodologies, and budgets for Murad Code alignment
- assess survivor consent processes, data protection measures and risk mitigation plans
- advise on whether proposed documentation is ethically justified or necessary
- recommend conditions, adaptations, or exclusions prior to funding approval
- support funder staff in making informed **go / no-go / redesign** decisions
- provide early capacity-building support to partner (especially community-based partners)
- give advice and/or conduct investigations regarding conduct which harms survivors.

External expertise does **not** replace organisational accountability but strengthens decision-making. It is important to consider how a project's budget can support external expertise including capacity-building exercises, support during preparatory steps and in monitoring and evaluation design and implementation.

Funding decisions and conditionality

Where external review identifies gaps or risks:

- funding may be **conditional** on implementation of expert recommendations
- budgets may be adjusted to include ethical safeguards, training, or survivor support
- activities involving survivor documentation may be limited, redesigned, or excluded
- in high-risk cases, funding may be declined where harm cannot be adequately mitigated.

Documentation and accountability

All decisions to engage or not engage external expertise, and the outcomes of such reviews, will be documented as part of the Funder's due diligence and risk management records.

D. PARTNER SELECTION CONVERSATION GUIDE FOR SCRSV INFORMATION-GATHERING AND USE

Rather than scoring partners mechanically, this kind of checklist works best as a **guided conversation tool**—used during due diligence, proposal reviews or partner dialogues—to assess experience, judgment, and ethical reflexes. Funders have to tailor and expand the tool.

Survivor-centred values and principles

Criteria	Indicators of seriousness	Red flags
Organisation's definition of "survivor-centred," and how that definition is reflected in daily practice Organisation understands survivor-centeredness as a set of values and behaviours, not a slogan.	• Emphasis on survivor safety, dignity, autonomy and choice. • Concrete examples of how survivors influence decisions about services, referrals, and information use. • Recognition of power imbalances and the organisation's responsibility to mitigate them.	• Abstract or policy-heavy definitions with no operational examples. • Framing survivor-centeredness primarily as "being kind" or "listening," without reference to choice or control.
Applying a survivor-centred approach to a situation where a survivor's preference conflicted with organisational, donor or coordination expectations Organisation has willingness to prioritise survivor agency when it is inconvenient or costly.	• Examples where staff upheld survivor choice even when it meant less data, fewer referrals, or weaker reporting. • Evidence of ethical reasoning rather than rule-following. • Comfort acknowledging tension and trade-offs.	• Claims that such conflicts "never happen." • Defaulting to donor, legal, or institutional priorities without reflection.

Criteria	Indicators of seriousness	Red flags
Ensuring survivors can meaningfully refuse, withdraw or limit their engagement with organisation's services or data systems Organisation has respect for survivor autonomy beyond initial access to services.	• Clear explanation of refusal and withdrawal options, communicated in accessible ways. • Separation between receiving support and agreeing to share information. • Examples of staff honouring partial consent or changed decisions.	• Language suggesting survivors must comply to receive help. • Confusion between consent and intake requirements.
Safeguards in place to prevent re-traumatisation through data collection, interviews or reporting Organisation has trauma-informed principles embedded in practice.	• Looking for information from sources other than survivors (avoid unnecessary engagement with survivors). • Avoiding repeated questioning of survivors and enquiring about unnecessary detail. • Training on trauma-informed communication and pacing.	• Emphasis on "capturing powerful stories" without attention to potential harms. • Assumptions that survivors benefit from recounting experiences.
Incorporating survivors' perspectives or feedback into programme design, monitoring or learning—without exposing them to risk Organisation has a commitment to accountability to survivors, not just to funding.	• Safe, voluntary feedback mechanisms that do not require disclosure of violence. • Use of aggregated or indirect feedback to inform improvements. Willingness to change programmes based on survivor input.	• Tokenistic consultation. • Expecting survivors to educate the organisation at personal cost.

Data management and protection policies

Criteria	Indicators of seriousness	Red flags
Survivor-centred data-collection purpose, and data-minimisation Organisation can clearly articulate why data on sexual violence is collected and demonstrates restraint in what is collected.	• A written data-purpose statement linking each data point to a concrete service, protection, accountability or other acceptable outcome. • Evidence of data minimisation (e.g. refusal to collect identifying details unless strictly necessary). • Clear distinction between data collected for service delivery, programme management, advocacy, and donor reporting—with justification for each. • Willingness to say "no" to donor requests that would increase survivor risk or burden.	• Emphasis on "numbers," prevalence, or impact storytelling without reference to survivor risk. • Overly broad intake forms or "just in case" data collection
Consent is treated as an ongoing, informed and revocable process, adapted to conflict, displacement or other relevant contexts Organisation has an essential understanding of survivors' rights to refuse to share information.	• Consent procedures explained in accessible language, adapted for literacy, language, age, disability, and power dynamics. • Clear options for survivors to refuse data collection or withdraw consent without losing access to services. • Separate consent for different uses of data (e.g. case management vs. reporting vs. learning). • Staff can explain how consent is re-checked over time, especially when data use changes or data is shared with others. • Protocol for how to approach consent/ intention verification in relation to open-source information-gathering and use, etc.	• Reliance on a single signed consent form as proof of ethical practice. • Staff inability to explain consent beyond compliance language. • Assumption that consent is not an issue regarding open-source information.

Criteria	Indicators of seriousness	Red flags
Robust data protection and security practices Organisation understands SCRSV data as high-risk and has proportionate safeguards in place.	• Clear data classification (e.g. SCRSV survivor data designated as highly sensitive). • Secure storage practices appropriate to context (digital and/or paper), including access controls and encryption. • Defined roles and permissions—only staff who need the data can access it. • Protocols for data transfer, sharing, retention, and safe destruction. • Incident response procedures for data breaches or security threats.	• Vague statements like "we keep data confidential" without operational detail. • Use of shared drives, personal devices, or unsecured messaging apps for survivor data.
Staff capacity, training and accountability Organisation has embedded ethical data handling in staff practice, not outsourced to a single "data person."	• Regular, role-specific training on trauma-informed data collection, confidentiality, security, well-being, and risk mitigation (including regarding remote engagements with survivors, and open-source research). • Understanding of specialised expertise required for certain aspects of work or work with certain survivors (e.g. children). • Clear codes of conduct and consequences for data misuse. • Supervisory structures that reinforce ethical decision-making around data. • Evidence that frontline staff can identify ethical dilemmas and escalate concerns.	• One-off trainings with no refreshers or supervision. • Over-reliance on technical tools without attention to human behaviour and power dynamics. • Approaching remote and open-source work as risk-light/free. • Thinking that working with children is the same as working with adults. • Having a one-size-fits all, one-expert-can-do-everything approach.

Criteria	Indicators of seriousness	Red flags
Understanding of ethical data use, sharing and learning Organisation uses data in ways that prioritise survivor safety, dignity, and agency—especially when sharing externally.	• Clear criteria for if, when, and how data is shared with donors, coordination mechanisms, service providers, researchers, other CSOs or authorities, etc. • Use of aggregation, anonymisation, or qualitative synthesis to reduce risk. • Cautious approach to storytelling and case examples, avoiding sensationalism or extractive narratives. • Demonstrated reflection on harm prevention, including lessons learned from past challenges or mistakes.	• Readiness to share raw or disaggregated SCRSV data for visibility or funding leverage. • Framing survivors primarily as data points or evidence rather than rights-holders

E. GUIDANCE ON ACTIVITIES, RESOURCING AND BUDGET LINES

There are a variety of project activities and budget lines related to the open-source, remote and in-person gathering and using information about SCRSV that funders may see in a proposal or may propose to partner to include or help them with in order to support their adherence to minimum standards. These include the following, non-exhaustive list:

Project activity	Budget lines (examples)	MC principles
Team selection/ recruitment, staff training and capacity-strengthening efforts	• staff time (including for processes to select experts, intermediaries, etc.) • consultants • meeting/workshop venue • interpretation/translation • meals, and travel and related	Principles 7.3-7.4, 7.6

Project activity	Budget lines (examples)	MC principles
Preparation activities for information-gathering and use including: • context and gender analysis inclusive of local (formal and informal) laws and practices • gathering information about others who may also be documenting SCRSV (actor mapping) • identification of alternative sources.	• staff time • consultants/context experts • translators/ interpreters • community consultations • travel and related	Principles 1.5, 5.3; 6.1-6.10; 5.5; 4.3 and 8.1
Risk assessment and safety measures including: • undertaking and reviewing of risk assessments and designing attuned, flexible mitigation measures (also for any remote and open-source work) • community/survivor consultations • audit/site or spot checks.	• staff time • consultants/security-safety experts • translators/ interpreters • community meeting expenses, venue, transport	Principles 5.3, 1.4, 1.5
MHPSS and survivor support referrals in survivor localities (also for remote engagement of survivors) including: • GBV service mapping, vetting and identifying referral networks, and formal and informal support resources (service mapping) • develop escalation protocol and establishing emergency response/ responders in locality.	• staff time • translators/ interpreters • site visit/scoping trip expenses, transport, etc	Service and referral mapping (Principles 5.6, 7.7)
Survivors as individuals and inclusivity including: • designing and resourcing flexible methodologies and safe spaces • reasonable accommodation for persons with disabilities and reducing other intersectional barriers • designing and implementing child-safe and friendly processes and expertise.	• staff time • consultant/service providers – rosters/options on gender e.g. • specialist expert time • travel and site visits/scoping • community engagement expenses	Principle 1, 1.10 Flexibility 5.2 Children 7.4, 7.6

Project activity	Budget lines (examples)	MC principles
Informed consent procedures: • setting up system where survivors can approach and request participation, rather than the other way around. • design of procedures and forms (also for remote engagements) • (see staff training above).	• staff time • travel/site visit and scoping to establish referral network into the project/activities (and/or remote scoping through trusted in-locality partners) • translation services (forms in local languages) • information leaflets/QR code/ website information/ etc. in local language about the activities/ project (where security allows)	Principle 2
Survivor support lines for small basic items interviewers to give to a survivor[12] to make interview more comfortable and safe including: • transportation or refreshments and/or reimbursement of communication costs (also in case of remote interviews) • basic hygiene or first aid materials • childcare vouchers • accommodation costs in situations where survivors need to stay overnight to complete the interview • emergency cash for circumstances where survivors need immediate access to lifesaving care.	• programme supplies such as transportation vouchers, refreshments, toiletries/first aid items. • childcare vouchers to help women attend meetings. • communication, travel, transport and accommodation costs • emergency cash to support survivors access to lifesaving care if needed	Principle 2.7
Coordination support lines for multi-sectoral coordination and cooperation which can reduce harm	• staff time • transportation • meeting/workshop venue • interpretation costs	Principle 5.7

12. Being mindful to not incentivise or coerce survivors.

Project activity	Budget lines (examples)	MC principles
Confidentiality and communications and information protection • data and communications security tools including purchasing software, secure devices, digital space and technology tools to enhance data and communications security for sensitive information	• staff time and training • consultant/specialist time • hardware, password protected hard drives and/or subscription costs for vetted cloud-storage service, handheld data-collection tools, etc. • digital security, encryption, data management and storage costs • password protected printers	Principles 4.10, 7.8
Follow-up and sustainability • resource follow-up capability/mechanism (through local partner/community-based organisation) • exit strategy (archive, data security/transfer)	• staff time • scoping visit expenses (to identify, meet and vet localised follow-up organisation/partner) and survivor/community consultations	Principles 5.9, 6.10, 7.9
Staff wellness and vicarious trauma prevention measures including training and access to psychosocial support services.	• staff time • consultants • contract lines to psychosocial support services for staff to access in case of need	Principle 7.10

F. RED FLAGS ON CONCEPT NOTES AND PROJECT DESIGNS

- ✖ No prior gathering and use of information SCRSV programming experience as an organisation (any signs of mission creep).
- ✖ No incorporation of demonstrated SCRSV competencies needed. (MC 7.3-7.4)
- ✖ Repeated use of buzz words with no substance or explanation (e.g. references to trauma-informed interviewing or child-sensitive approaches but inability to explain what that means in practice and why specialised expertise is required to do such work well).
- ✖ No prior country/locality experience or demonstrated understanding, or indication of cultural competency. No sign of or reference to dynamics of gender or conflict analysis and how it relates to the project. (MC 6, 7.3)

- ✖ No actor mapping or sign that work has been done to understand what other work is being done by whom in that context. (MC 5.5)
- ✖ No explanation or articulation of decision-making supporting the projective objectives, its added value and its realistic chance of delivering. (See MC Principle 4 checklist tool at *page 25*.)
- ✖ If relevant, no indication that the project was co-designed with community-based actors or was informed by community or survivor-network consultation (MC 4.1).
- ✖ No integration of informed consent and mechanisms to ensure survivors retain control over their information and stories, as far as possible. (MC 2, 5.9)
- ✖ Nothing in the design suggests consideration or adaptation to identify and reach those often excluded, silenced or overlooked as survivors, no gender analysis or gender disaggregation for data collection and project design. (MC 1.1, 1.8, 5.2)
- ✖ Nothing addressing different information sources (pros, cons, risks), different ways of information-collection (pros, cons, risks, protocols), information-sharing and -storage (risks, protocols), data minimisation, what type of information is needed. (See questions to ask potential partners about SCRSV information on *page 26*.)
- ✖ No emphasis on or description of how safety will be prioritised. (MC 1.4, 1.5, 3.1, 3.8, 5.3, 7.8, 8.3, 9.6)
- ✖ No detailed description on coordination and collaboration with other actors in the space/context. (MC4.8, 4.9, 5.7, 6.10, 8.5)
- ✖ Large numbers of target survivor interviews. Any other focus on quantity over quality and safety. (MC 9.6)
- ✖ Short timeframe for projects (which are not already underway or part of a well-functioning survivor support and response system).
- ✖ Urgent deployment without demonstrated preparation. (MC 4.7, 5.1)
- ✖ Missing budget lines for:
  - proper preparation before starting survivor-engagement activities in country
  - risk assessments and mitigation measures (including in relation to any remote and open-source work), with regular reviews and monitoring of risk
  - specialised expertise that may be required (e.g. child-interview experts; communications and data security experts)
  - MHPSS wellbeing and support, for beneficiaries/survivors and for personnel (MC 5.6, 7.7, 7.10)
  - information management and protection (MC 7.1, 7.8), and security of communications
  - identification of a range of safe spaces and safe interaction/interview protocols (MC 5.4, 9 and 10) (See Tool E above)

G. TIPSHEET: CONDUCTING FUNDER MONITORING VISITS TO PROJECTS DOCUMENTING SCRSV

Site visits to programmes/projects give funders and project staff a chance to interact and for funders to see things for themselves. They can talk directly to people "on the ground", see how the work is being done, and better understand the related challenges and the needs and support around SCRSV. However, it is important to make sure that no harm is done during or in relation to such visits. Funder representatives must prioritise partner's, survivors, and communities' safety and well-being.

This tipsheet contains some suggestions of how funders may want to approach this topic. The tipsheet must be adapted and used by funder representatives to help ensure that any such visits are planned and conducted respectfully, ethically and in non-intrusive ways. It underscores the need to uphold survivor-centred approaches, prioritise the safety and dignity of all participants, and protect sensitive data and identities, in line with the Murad Code.[13]

It can also be used to guide conversations with partners' communication and donor-relations staff to ensure they do not overstep and inadvertently harm survivors by pressuring them to meet with funders, pose for photos or share their stories.

1. Plan in advance

- Give clear guidance to partners that survivors should not be contacted directly or indirectly about any impending visit until the funder and partner have agreed on the purpose, scope and specifics of and protocols for the visit.
- Tell partners in advance that they should not assume that visitors want to meet with survivors.
- Funders must consider, after consultation with the partner, whether it truly is necessary to meet with survivors during the visit, and in which circumstances, if any, to agree to meet with survivors. Related preconditions and protocols for meeting survivors, including in case of unscheduled, impromptu meetings, and in case of meetings for content creation by communications staff of funders, should be agreed beforehand so that the partner and funder can the visit accordingly. As necessary, advice from psychosocial support experts may have to be sought.

2. Understand the risk of harm arising in relation to visits

- Recognise that SCRSV information-gathering is conducted under conditions of high risk to both survivors and information-gathering teams. Breaches in protocol can compromise safety and confidentiality, and may expose individuals to further harm, stigmatisation or retaliation. For instance, if it has been determined to meet with survivors if possible, ask partners what measures they would put place to risk assess and mitigate potential harms, including regarding re-traumatisation, stigma and security, that may arise in relation to the visit.
- Be mindful of local sensitivities, power dynamics and cultural stigmas surrounding SCRSV and emphasise a survivor-centred approach. Ask the partner how it would ensure that survivors who may be approached to meet with the funder would feel no pressure, or would not be unduly incentivised, to agree to such a meeting.
- Funders should provide visitor profiles in advance to identify and plan appropriate activities.

13. Adapted from an unpublished early version of UNFPA's Guide on Donor Visits to Women and Girl Safe Spaces.

3. Respect confidentiality and privacy
   - Do not (prior to, during of after the visit) request from anyone access to confidential case files or identifying information about survivors, including names, locations, photos or audio/video testimonies.
   - Do not (prior to, during of after the visit) ask anyone for specific details about individual cases of SCRSV unless anonymised, aggregated data has already been shared in reporting formats and disclosure has been ethically approved by the partner.
   - Communications staff, in particular, are forbidden from seeking survivors on their own to create content.
   - No one from the partner or funder should take any photographs or recordings without prior, written consent from the partner and any individuals present. Consent must be free and fully informed, including in relation to the purpose of the recording and whether those recorded can later withdraw their consent. Seeking consent from individuals in a group setting may may it difficult or awkward for individual survivors to say no.

4. Do not pressure staff or survivors to share sensitive information
   - The psychological safety, healing and autonomy of survivors are of paramount importance and any pressure to speak – which pressure may stem simply from a partner or funder asking whether a survivor would agree to meet with the funder – may undermine that.
   - Avoid intrusive questions about trauma, perpetrator details or anything else that may re-traumatise or otherwise distress those involved.

5. Engage respectfully with partner personnel
   - Allow the partner to lead the structure and flow of the visit based on their context and in accordance with security and other assessments.
   - Acknowledge the emotional labour and risks that partner personnel assume in this work, and refrain from overloading them with additional demands during the visit.
   - Create space to hear staff reflections on challenges, ethical dilemmas and well-being – without placing them in a position to justify survivor decisions or project limitations.
   - Respectfully, sensitively and as necessary, confidentially, engage with partner personnel about how they manage the risk of vicarious re-traumatisation.

6. Engage respectfully with the broader affected community
   - The power imbalance between funder visitors and affected communities can pressure people to participate in conversations, filming or photography even when they do not feel comfortable. To avoid such situation or any misuse of power, funders should work with partner personnel to seek informed consent before engaging with non-survivor members of the affected community.

7. In summary
   - Funders should avoid questions and conduct which may be perceived by partners as scrutiny. The credibility of funder visits will rest not on the visibility of survivors' pain but on the integrity with which funders engage those who work on SCRSV and who engage with survivors.



MURAD CODE PROJECT

