

PUTTING PEOPLE FIRST

**TACKLING SEXUAL EXPLOITATION, ABUSE
& HARASSMENT IN THE AID SECTOR**

Cross-Sector Progress Report on Safeguarding Against Sexual Exploitation, Abuse and Harassment (SEAH) 2020-2021

A summary of work between October 2020 and October 2021 by the groups and organisations that made commitments at the October 2018 London Safeguarding Summit, and others working to align their safeguarding work with the long-term shifts identified at the summit.

October 2021

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Introduction and Summary

On 18 October 2018 the UK hosted a [summit](#) to galvanise action to tackle sexual exploitation, abuse and harassment (SEAH) in the aid sector. The summit was a landmark moment for the sector which came together to commit to do more to prevent harm from occurring and to respond better where it does.

Participants included donors representing 90% of global Official Development Assistance (ODA), the United Nations (UN), International Financial Institutions (IFIs), UK non-Governmental Organisations (NGOs), UK private sector, research funders, CDC Group, GAVI, the Global Fund and survivors and victims.

Each main group that participated in the summit made a [set of commitments](#) tailored to the unique ways in which they operate and designed to lead to meaningful change in the organisations they represented. All eight sets of commitments though were designed to bring about the same four long-term shifts:

1. Ensure support for survivors, victims and whistle-blowers, enhance accountability and transparency, strengthen reporting and tackle impunity;
2. Incentivise cultural change through strong leadership, organisational accountability and better human resource processes;
3. Agree minimum standards and ensure we and our partners meet them; and
4. Strengthen organisational capacity and capability across the international aid sector, including building the capability of

implementing partners to meet the minimum standards.

Driving up safeguarding standards is a collective responsibility for the aid sector. As such, since 2018 the UK¹ has convened a Cross-Sector Safeguarding Steering Group (CSSG). This group includes representatives from each of the groups which made commitments at the summit along with independent voices. It also includes the CHS Alliance (CHSA, which oversees one of two key minimum standards on safeguarding underpinning the summit commitments²) and the British Red Cross which set out [commitments](#) in 2019 to prevent and respond to SEAH across the Red Cross and Red Crescent (RCRC) Movement, aligned with the four shifts outlined above.

The CSSG has continued to meet on a roughly quarterly basis and provides a space for sharing challenges and lessons. The group works to support each other to meet their respective commitments and raise ambition.

The CSSG has prepared this report to update on the progress the aid sector has made over the past 12 months towards the summit commitments and improving safeguarding standards. Each of the eight groups which made commitments at the summit, along with the RCRC, have provided an update. This report follows on from the progress reports published in [2020](#) and [2019](#).

Over the past year, organisations have strengthened their safeguarding policies and procedures, provided new resources to enable

1 This work was initiated by the former UK Department for International Development (DFID). On 2 September 2020, DFID and the Foreign and Commonwealth Office merged to become the Foreign, Commonwealth and Development Office (FCDO). Since then, FCDO has convened the CSSG.

2 The CHS Alliance (CHSA) represents the Core Humanitarian Standard, which has been developed by the CHSA, Sphere and Group URD. The other minimum standard which underpins the London summit commitments, the Interagency Standing Committee (IASC) Minimum Operating Standards for PSEA, is represented in this group by UN agencies.

risks to be better managed and recruited new staff to work on tackling SEAH and to drive change. They have also invested in the skills of their staff, partners and clients and strengthened funding agreements to ensure all those involved in delivering aid are aware of the required safeguarding standards.

Efforts have also been made to demonstrate strong leadership on this agenda including at the highest levels and through new tools. CSSG members have continued to work together to make progress, including around employment accountability initiatives and to put the interests and needs of survivors and victims first.

In addition to outlining progress made, the report highlights challenges encountered and lessons learnt to help support other organisations to improve their safeguarding activities. The report identifies that more work is needed to further improve survivor-centred approaches, reduce underreporting of SEAH and improve data.

The COVID-19 pandemic has continued to pose a huge challenge to the sector. The pandemic has increased the risks of SEAH, including through the distribution of COVID-19 vaccines, and makes the need for effective safeguarding more important than ever. At the same time, restrictions on movement have made responding to reports of SEAH more difficult. The level of commitment to safeguarding has however remained high and organisations have continued to adapt their approaches to respond as effectively as possible.

In the year ahead organisations plan to continue to make progress with implementing safeguarding policies, procedures, and action plans as well as to further train their staff and partners. Continued collaboration is also planned to enhance learning, harmonize approaches and to progress joint initiatives such as on employment accountability, data and survivor-centred approaches.

The CSSG's future work will continue to be guided by the collective aim that safeguarding against SEAH makes a real and positive difference for survivors, communities the sector works with and aid workers. The summit three years ago generated momentum which has been maintained and which we remain determined to continue to build upon.

Highlights and Trends

- » **Many organisations have enhanced their safeguarding policies and developed new resources to improve the management of the risks of SEAH.** To ensure that there are strong approaches to addressing SEAH, significant efforts have been made across the sector to improve policies and procedures. International Financial Institutions (IFIs) have enhanced their Environmental and Social Policies and Procurement Policies to better tackle SEAH, and the Global Fund has updated its Codes of Conduct. Organisations have also produced new guidance and tools to help staff to mitigate the risks of SEAH connected to their programmes. New positions and units have been created to support work, including at the Global Fund, IFIs, and UK Research and Innovation and UK universities.
- » **Further action has been taken to ensure safeguarding standards are adopted by implementing partners.** In addition to strengthening their own internal policies, funding agreements have also been strengthened to help ensure partners also meet safeguarding standards. For instance, GAVI which is playing a central role in COVAX to distribute COVID-19 vaccines, strengthened SEAH provisions in its contracts. The United Nations (UN) and 15 donors also agreed aligned language on SEAH for funding agreements strengthening accountability around the UN.
- » **Investments have been made to train staff and partners and build their skills in responding to SEAH.** Multiple organisations have continued to implement or develop new training programmes to raise awareness and build skills in addressing SEAH. This has included mandatory training for all staff and advanced training for specialist staff. Some organisations have developed their own training while others have used existing products, some of which are free. Organisations have also worked to train their partners and clients, although working with partners to achieve effective safeguarding has remained a more challenging area. Local safeguarding focal points are increasingly being engaged to support context specific approaches and improve communication with downstream partners.
- » **Strong leadership has continued, and new tools have been developed to support cultural change.** Changing organisational cultures so that harmful behaviour isn't tolerated is essential and an area widely recognised as needing long-term action. Strong leadership is key to this change and has continued to be demonstrated. For example, under the UK's G7 Presidency, G7 member countries issued communiqués acknowledging collective responsibility to do more to tackle SEAH across the aid sector and to adhere to the DAC Recommendation on Ending SEAH. The UK NGO platform Bond launched a new leadership [tool](#), funded by the FCDO, and a culture tool to support positive safeguarding cultures. CHSA also created an [initiative](#) to cultivate caring and compassionate aid organisations.
- » **There has been regular collaboration between aid organisations to share best practices and expertise.** Significant collaboration has occurred in a wide range of existing forums including, but not limited to, the CSSG. USAID and the Netherlands created a Community of Practice (CoP) to discuss practices to prevent the hiring of perpetrators and a significant community evolved over nine months with 231 registered participants. Bond (the umbrella organisation for UK international

development NGOs) saw record attendance at a safeguarding event.

» **The sector has made progress with initiatives to prevent the hiring and rehiring of perpetrators in the aid sector.**

Organisations have continued to actively participate in the [Misconduct Disclosure Scheme](#) to improve information sharing on past misconduct. Representatives of the sector have also steered the development and implementation of the UK and Interpol's Project Soteria which aims to strengthen cooperation between law enforcement agencies and the aid sector to stop perpetrators. USAID and the Netherlands' CoP mentioned above resulted in a roadmap which will inform future work.

» **Action is being taken to provide survivor-centred approaches.**

These put the needs and interests of the survivor first when responding to allegations of SEAH. Aid organisations are working to do this through improving investigations, mapping and providing counselling and other health services to survivors, and supporting survivors to access justice. Significant efforts are being made, for instance the UK private sector reported most suppliers surveyed had acted in this area in the last year. The UN has developed a statement to help victims understand their rights, due for approval in 2021, and prepared a technical note and training to support the implementation of the [UN Victim Assistance Protocol](#). The DAC Reference Group on SEAH will be one forum in which collaboration will continue to further improve survivor-centered approaches. Steps have also been taken to enhance protections for whistle-blowers, an area which is also a priority for further improvement.

» **Levels of reporting of SEAH remain low, but there are signs of improvements.** Overall, the number of reports of SEAH being made are relatively low suggesting that underreporting

remains a challenge in the aid sector. That said, they increased for several donors providing data this year along with CDC Group, the Global Fund and some UK private sector suppliers. This may indicate increasing trust in organisations to respond appropriately. Organisations have made changes over the past year to further encourage reporting, for instance IFRC introduced a new confidential integrity line. It is hoped these changes will reduce underreporting so survivors can receive support where wanted and harm can be stopped.

- » **Data on SEAH remains a challenge but progress is being made.** Collecting data on SEAH across the sector also remains a challenge due to a lack of uniformity in how data is shared and no central repository for collecting data. Work is underway to improve this. Eight new donors shared data on their SEAH cases in this year's report. CHSA, the Steering Committee for Humanitarian Response (SCHR) and the UK have also made good progress with their project to harmonize data collection and reporting across the sector, completing phase 1 this year.
- » **The COVID-19 pandemic has continued to present challenges to the aid sector as well as driving innovation and learning (see box below).**

The impact of the COVID-19 pandemic on safeguarding against SEAH in the aid sector

The COVID-19 pandemic has created a significantly different global context to that of 2018, presenting huge challenges to the aid sector but also opportunities for it to learn, adapt and improve its approach to safeguarding.

The pandemic is widely considered to have caused increased risks of gender-based violence (GBV) and SEAH in many places around the world. As livelihoods have been disrupted by lockdowns, vulnerabilities to SEAH have increased as power imbalances have widened in some circumstances between aid workers and the communities they work with. As populations have spent more time in their homes and communities, and social networks have been disrupted, the risks of sexual violence have increased.

At the same time, lockdowns have created challenges for the reporting of concerns. Travel restrictions have hindered the ability of organisations to visit projects, monitor activities, provide support to survivors, and conduct in person investigations. Lockdowns have also placed additional pressures on in-country consultants and partners who have played an especially key role in the delivery of aid given international travel restrictions. Furthermore, the pressure on public finances from the response to the pandemic has impacted some aid budgets and availability of finance across the sector. Some organisations have had to delay work.

Despite these challenges, the aid sector has remained highly committed to safeguarding in the past year. Organisations have invested in research to better understand the impacts of the pandemic and how to respond. They have continued to adapt their safeguarding controls, provide guidance and training on how to manage the SEAH risks caused by COVID-19

in their projects, built measures to respond to risks into programmes, adapted mechanisms for receiving complaints and promoted the well-being of staff. Agencies have also strengthened relationships with local partners and worked towards building local consultants' capacities. They have used mobile phones and other technology to maintain regular communications with survivors and have adapted how they investigated cases, utilising remote methods and external partnerships. Digital tools have also been used, for example by the Victim's Rights Advocate, to strengthen advocacy.

The rapid development of COVID-19 vaccines has been a monumental achievement. The largest roll out of vaccines to adult populations ever recorded in history is now occurring and remains a global priority. Despite the tremendous successes in their development, there is awareness in the aid community that COVID-19 vaccines may represent a high value medical commodity in certain places where access to them is limited. As such, risks of abuses of power including SEAH connected to their distribution are expected to increase. The sector, including GAVI which plays a central role in distributing COVID-19 vaccines via COVAX, has acted by reviewing and updating programmatic guidance to ensure the risks and mitigations are properly considered in vaccine distribution plans. Donors have worked together and will continue to do so to ensure an effective approach to mitigate the risks is taken.

Responding to the changing risks caused by the pandemic and vaccine distribution will continue to be an area for further focus over the coming year. It is expected to provide further opportunities to innovate, learn and strengthen approaches, including by adapting again where workers return to offices and hybrid working models evolve.

Next Steps

Over the next year the CSSG members will continue to strive to improve standards and practice in tackling SEAH as they continue to implement their Safeguarding Summit commitments. This will include working to implement safeguarding policies, procedures, and action plans. Organisations also plan to further build their capability to prevent and respond to SEAH, including through training and undertaking awareness raising activities for staff, clients and implementing partners. There will be a continuing focus on the management of risks connected to the COVID-19 pandemic and vaccine distribution, including supporting staff returning to offices and adapting to hybrid working models.

Organisations also plan to continue working with others in the sector to share best practice and expertise. This will include collaboration within sub-sections of the aid sector. For example, donors plan to continue to engage in key fora including the DAC Reference Group on SEAH. Multilateral Financial Institutions and the UK Private Sector will continue their joint working and UK NGOs will refresh and continue collaboration through two new safeguarding working groups. Strong cross-sector collaboration is also expected, including around employment accountability initiatives and projects to improve SEAH data. Further improving survivor-centred approaches is also anticipated to be a particular focus for collaborative efforts. Underpinning everything will be the shared aim of ensuring the greatest positive difference is made for survivors, communities the aid sector works with and for aid workers.

1. Donors

Introduction

Three years on from the London [summit](#), representatives of the 23 signatories to the donor [commitments](#) continue to meet at least quarterly and to engage in the Reference Group to implement the July 2019 Development Assistance Committee (DAC) [Recommendation](#) on Ending Sexual Exploitation and Abuse and Harassment (SEAH). Building on existing momentum (donor reports [2019](#) and [2020](#)), a strong impetus remains to pursue zero tolerance to inaction on SEAH individually, collectively and with all implementing partners. Too many cases of SEAH still occur linked to development programmes, which underlines the need to continue this collective effort.

Progress

1. **Aligning donor language on SEAH requirements in funding agreements with the UN.** In May 2020 fifteen donors³ wrote to the United Nations Chief Executives Board for Coordination (CEB), presenting their proposed aligned SEAH language for use in funding agreements with UN entities. The UN Secretary-General, as Chair of the CEB, responded positively and tasked the UN Office for Legal Affairs (OLA) with taking this forward on behalf of the UN system. For efficiency, it was agreed donors would also negotiate as a bloc. The Netherlands and the UK represented donors in negotiations

that concluded with agreement in July 2021, while the USA⁴ indicated it would negotiate directly with the UN on a bilateral basis. The agreed language will help to raise international standards on SEAH, improve reporting, and reduce the administrative burden on donors, UN entities and implementing partners alike.

The agreed language requires funded agencies to: (i) apply the Inter-Agency Standing Committee (IASC) six core principles relating to sexual exploitation and abuse, and to adhere to the IASC Minimum Operating [Standards](#) on Preventing Sexual Exploitation and Abuse (PSEA) and/or the Core Humanitarian [Standard](#); (ii) enshrine a victim/survivor centred approach⁵; (iii) make all reasonable efforts to enhance accountability and transparency and ensure that standards in donor arrangements with UN entities are reflected in the funding templates/ requirements with implementing partners; and (iv) use the UN Secretary-General's online SEA reporting mechanism when cases emerge, with prompt reporting also to donors.

Work is continuing to encourage other donors to align with the language and to extend the same language to agreements with other multilateral partners. Donors are also developing a set of collective asks of the UN system that set out our short, medium- and long-term priorities.

3 Australia, Belgium, Denmark, Italy, France, Germany, Luxembourg, Netherlands, New Zealand, Norway, Portugal, Spain, Switzerland, UK, and the USA.

4 The United States Agency for International Development (USAID) concluded its bilateral negotiations with the UN OLA in May 2021.

5 A victim/survivor centred-approach is one for which the victim/survivor's dignity, experiences, considerations, needs, and resiliencies are placed at the centre of the process, from the initial program design to investigating and responding to potential incidents, based on four key principles: safety, confidentiality, respect, and non-discrimination.

2. **USAID and Netherlands Community of Practice on Employment Accountability.**

In September 2020 USAID and the Netherlands Ministry of Foreign Affairs launched a virtual Community of Practice (CoP) on SEAH and employment accountability. During a series of meetings over a nine-month period, participants discussed employment practices related to hiring, referencing, accountability and onboarding processes, to analyse options for preventing the hiring and recirculation of perpetrators in the aid sector (donor summit [commitment #3](#)). A significant community of practice (231 registered participants) evolved, comprised of donors, academics, researchers, lawyers, investigators, NGOs and other experts keen to share experience and build capability to prevent and address SEAH.

The CoP resulted in an [Employment Accountability Roadmap](#) that focuses on five key areas or common challenges, recommending improved practices in the areas of capacity building, human resources, investigations, legal affairs and risk management. Themes for continued action include: (i) development of survivor-centred approaches that are informed and driven by the needs and rights of survivors; (ii) more proactive SEAH risk management throughout the life of a programme with a stronger focus on people, including survivors and checks on potential employees; and (iii) learning from work on Gender-Based Violence to help improve SEAH prevention and response and organisational culture change. Further resources from the CoP can be found on the [Padlet](#), including best practice documents, guidelines, initiatives and research shared by CoP participants.

Key messages from USAID Administrator Samantha [Power](#) and Netherlands Minister for Foreign Affairs and Foreign Trade and Development Sigrid [Kaag](#) during the final

workshop in June 2021 focused on the importance of leadership, collaboration, coherence and ensuring that survivor-centred approaches are integral to all efforts. DAC Chair Susanna Moorehead welcomed the opportunity for the OECD DAC to take on this work. USAID and the Netherlands will work with the DAC Reference Group on SEAH to progress the Roadmap and integrate the work within the implementation of the DAC Recommendation and Action Plan.

3. **G7 SEAH commitments, 2021.** Keeping SEAH on the international political agenda is needed to maintain the momentum for collective action and accountability in tackling SEAH. This year, under the UK's G7 Presidency, the seven members (Canada, France, Germany, Italy, Japan, United States, United Kingdom) issued communiqués in [May](#), [June](#) and [September](#) acknowledging collective responsibility as G7 members to do more to tackle SEAH across the aid sector, including a call for all involved in the endeavour to adhere to the [DAC Recommendation on Ending Sexual Exploitation and Abuse, and Harassment](#). This will stimulate action on SEAH in various donor fora and galvanise support for continuing collective initiatives. The DAC Reference Group on ending SEAH will continue to be a multi-donor forum to pursue implementation of the DAC Recommendation across all 30 major donors, with a focus in the coming year on capacity building and guidance.

Challenges and Lessons

1. **COVID-19 continues to present challenges and donors continue to flex and adapt to changing circumstances.** Many donors continue to work on internal processes to address these challenges, producing guidance for staff, adapting monitoring processes, undertaking

remote investigations and enhancing risk management. With many donors making significant investments in COVID response efforts, particularly the COVAX initiative and related processes that aim to ensure COVID-19 vaccine equity for poorer countries, a specific challenge will be managing an increased risk of SEAH in vaccine roll-out. Donors have a responsibility to act, in collaboration with the UN and other aid organisations, to manage this risk. The [Rome Declaration](#) at the May 2021 World Health Summit committed to investing in worldwide health and care workforce, with a strong focus on inclusion and gender equality. It provides an opportunity to ensure that capacity building to tackle SEAH is a key part in the roll-out of that commitment. Similarly, donors made commitments in a [draft resolution](#) at the May 2021 World Health Assembly to strengthen WHO's efforts to tackle SEAH. Delivery of those commitments will help to manage the heightened SEAH risk linked to vaccine roll-out. Ensuring that the COVAX facility incorporates SEAH in the anticipated training protocols and procedures for health workers planned in almost 200 countries, is a priority to mitigate the risks.

2. **Organisational culture change—a long-term challenge.** The October 2018 donor commitment document places a strong emphasis on tackling power imbalances and improving organisational culture across aid agencies. The Core Humanitarian Standard Alliance (CHSA⁶), recognising the need to improve diversity and work cultures, launched a [new initiative](#) in April 2021 to foster caring and compassionate aid organisations, directly linking staff well-being with organisational culture, especially inclusion and leadership. In May 2021 Bond launched a [new leadership](#)

[tool](#), funded by the FCDO, to support positive organisational culture change to help prevent SEAH, with specific focus on accountability, do no harm, survivor-centred approaches, awareness-raising and safer recruitment. The Netherlands-USAID CoP highlighted organisational culture change as an ongoing priority across the board and especially at country level for maintaining ethical work environments and cultures based on respect and integrity.

Donors have supported these initiatives and continue to address issues within their own organisations through training and awareness raising (e.g. Australia, Canada, Finland, Italy, Netherlands, Sweden, Switzerland UK, USA), amplifying leadership through appointing high level champions (summit [commitment #7](#)) (e.g. Australia, USA, UK), developing policies, strategies and action plans (Australia, Ireland, Netherlands, Sweden, UK, USA); improving risk management (Finland), working through Executive Boards, including on joint statements, to hold the UN to account (e.g. on the [WHO](#) Australia, Canada, Mexico, the USA and other signatories).

3. **Ensuring a survivor-centred approach** is both a significant aim and continuing challenge. This is an intrinsic aspect of organisational culture change where survivors' needs and interests must take priority over reputational risk. Priorities include to: facilitate safe and effective reporting pathways and referral to services; ensure survivor-centred investigation approaches; and empower survivors to participate in and shape policy and operations. As noted earlier, the agreed aligned donor language reflects the Guiding Principles which underpin the UN minimum standards on Gender-Based Violence (GBV)—safety, confidentiality, respect and non-

6 Supported by Australia, Denmark, Germany, Luxembourg, Netherlands, Sweden, Switzerland, United Kingdom.

discrimination.⁷ All donors recognise that more work needs to be done to understand and develop aid delivery in a survivor-centred way.

Moving forward, the DAC SEAH Reference Group will take up these challenges, absorbing the Netherlands-USAID CoP into its Action Plan, to support learning and best practice on the CoP priorities, namely: survivor-centred approaches; risk management; organisational culture change; and using lessons from the GBV community to better tackle SEAH prevention and response. The DAC SEAH toolkit will be a repository for this work. Donors will continue to explore joint initiatives to address challenges and test innovative approaches.

Case Study

Denmark, Germany, Luxembourg, Switzerland and the UK jointly fund the Humanitarian Quality Assurance Initiative (HQAI), whose remit is to improve quality and accountability in the aid sector by auditing organisations' application of the Core Humanitarian Standard, including a specific focus on PSEAH. One of the joint donor aims in coalescing around international standards (Summit [commitment #14](#)) is to improve coherence on standards and reduce transaction costs for the sector.

This year HQAI undertook an ex-ante audit of a Swedish NGO for the EU ECHO partnership framework demonstrating that 80% of ECHO's requirements were covered by the CHS audit, and with a 20% add-on was able to cover all questions. The NGO now holds both CHS certification and the ECHO framework requirements at a fraction of the cost to the NGO.

The exercise demonstrates that certification against the CHS has the potential to reduce duplication of audits, decrease the compliance burden and decrease financial and other transactional costs, without losing any robustness. A potential multiplier effect could herald significant efficiency savings for the sector. More work is planned over the coming year to further prove the concept and encourage donors to undertake pilots.

⁷ See the [Interagency Standing Committee guidelines](#)

Reports of Cases

The number of donors providing data has increased from two in last year's report (Netherlands and UK), to ten.

Country	Number of external reports	Outcome	Other action/ comments	Trend
Australia	61	20 substantiated, 2 unsubstantiated, 17 deemed out of scope, 22 still to be determined.	The most common perpetrator outcomes were employment termination or resignation	Notifications have decreased slightly since COVID-19's onset
Finland	Fewer than 5 cases	All substantiated and concluded	Annual internal survey covers sexual harassment	Based on the survey there was a minor increase (2020->2021) in SH
Germany (GFFO ⁸)	19 reports	7 concluded to date	N/A	Upward trend, 13 more than 2019
Japan	Fewer than 5 cases	All substantiated and concluded	JICA has established a complaints mechanism for those who have no direct contractual relationship with the agency but wish to report allegations related to JICA work	N/A
Netherlands	34	20 concluded; 14 remain open	N/A	Increase from 31 in 2019
New Zealand	Fewer than 5 cases	Remain open	Working to strengthen reporting mechanisms	N/A
Sweden	38	11 substantiated, 4 unsubstantiated, 23 ongoing.	3 reported to relevant authorities; 10 resulted in dismissals or non-renewal of contract.	N/A
Switzerland (SDC)	14	9 cases concluded; 5 remain open.	Unified reporting platform to be launched in 2021	Increase from 2019

⁸ GFFO is the abbreviation for the German Federal Foreign Office.

Country	Number of external reports	Outcome	Other action/ comments	Trend
UK (FCDO)	214	External: 55% cases resulted in disciplinary action, up to and including dismissal; 21% of cases there was no evidence; 14% of cases partners took other action to strengthen safeguarding policies and control mechanisms; remaining cases there was insufficient evidence or lack of engagement from witnesses or survivors to progress investigations.	The most common external case types reported in 20-21 were: SEAH; non-sexual discrimination and harassment; physical abuse; and child exploitation. 12 new internal cases and 22 existing internal cases concluded: 8 of 22 allegations upheld, resulting in disciplinary action up to and including dismissal.	Upward trend in external cases. ⁹ From 41 in 2017 18, to 143 in 2018 19, 206 in 2019 20 and 214 in 2020-2021 Internal cases have dipped in past year, most likely due to majority of staff working from home due to COVID-19.
USA	59 ¹⁰	In various states.	State and USAID are improving internal systems for receiving, tracking, and responding to SEA reports, with USAID piloting a new centralized intake and tracking system this autumn.	Upward trend.

⁹ To note, figures given here for 2020/21 are for SEAH only, in previous reports case numbers quoted were for all types of safeguarding cases investigated.

¹⁰ This figure includes 25 cases reported by the United States Department of State, Bureau of Population, Refugees, and Migration (State/PRM) and 34 cases reported by the United States Agency for International Development, Bureau for Humanitarian Assistance (USAID/BHA).

All those above reporting case numbers this year have systems in place, or are improving systems, to encourage reporting from implementing partners to donors, and to work on internal reporting systems. Other donors not listed have clear policies and systems, but aren't in a position to share data. Reporting on internal cases remains low overall and both donor and partner reporting systems require continued attention.

The work of the 15 donors to align SEAH requirements in UN funding agreements requires use of the UN Secretary-General's online SEA reporting mechanism, with additional prompt reporting also to donors. The UK is working with the CHS Alliance and the Steering Committee for Humanitarian Response to pilot harmonised NGO reporting. It is hoped that these initiatives will help to incentivise reporting.

Next steps

Donors will continue to work through their own systems and with their own partners and stakeholders to improve standards and best practice in tackling SEAH as they pursue implementation of summit commitments and implementation of the DAC Recommendation. A mid-term review of the Recommendation will signpost further areas for action.

Donors will continue to collaborate through international fora on joint initiatives to maintain pressure for accountability across the international development sector. Priorities will be working through the DAC Reference Group to implement the SEAH Recommendation and take forward the CoP Roadmap, and through the technical donor working group to develop further engagement with the UN system on issues that will improve sector capability and accountability on tackling SEAH.

Donors welcome the fact that several UN agencies have already 'adhered' to the 2019 DAC Recommendation and urge others to do so.

2. United Nations

Introduction

In September 2021 [the Secretary-General issued a statement](#) marking four years since he introduced the [Voluntary Compact with Member States](#), his [Circle of Leadership](#)¹¹ and the first UN system-wide [Victims' Rights Advocate \(VRA\)](#). The statement identifies progress made against the 2017 [strategy](#) to protect from sexual exploitation and abuse and builds on the most recent [annual report](#). The [UN Factsheet](#), updated quarterly, summarizes initiatives, progress and timelines for future action.

Progress

1. **Victims' rights and support.** The Office of the Victims' Rights Advocate (OVRA), supported by several other United Nations entities, developed a methodology to govern a roster of lawyers and legal aid organizations willing and qualified to offer *pro bono* legal assistance to victims of sexual exploitation and abuse by UN staff and other personnel in criminal accountability proceedings, and civil cases such as paternity and child support claims. A Victims' Rights Statement designed to serve as a common point of reference for all personnel working under the UN flag and provide guidance for victims so they understand their rights is expected to be approved in 2021. To support implementation of the UN Victims' Assistance Protocol, UNICEF led the development of a technical note and training package in collaboration with the UN Secretariat, OVRA, United Nations High Commissioner for Refugees (UNHCR), United Nations Population Fund (UNFPA), International Organization for Migration (IOM) and the Inter-Agency Standing

Committee (IASC) that is being rolled out for UN Country Teams and Humanitarian Teams, inter-agency PSEA coordinators, networks and focal points. With the financial support of the UK, OVRA, OHCHR, the Office of the High Commissioner for Human Rights and IOM are developing a multi-media training tool on the victims' rights approach and the meaning of a victim-centred approach to SEAH.

2. **Inter-Agency Standing Committee.** In March 2021, the IASC endorsed a strategy designed to strengthen protection from SEAH across the humanitarian sector. UNFPA, as the current IASC Champion on prevention of sexual exploitation and sexual harassment has three priorities: 1) bolstering country mechanisms 2) strengthening access to quality information and assistance; and 3) strengthening coordination and coherence, including by sponsoring the IASC Independent External Review on PSEAH to identify successful collective efforts and recommend further action. Findings from the Review will be presented at a High-Level meeting on 23 November. The [IASC Prevention of Sexual Exploitation and Abuse website](#), supported by UNICEF, features technical resources, guidance, tools and information. The [IASC PSEA Dashboard](#) tracks progress on accelerating prevention across 40 countries, selected in line with IASC commitments and priority areas.
3. **UN system-wide action to prevent sexual harassment.** The UN Chief Executives Board for Coordination Task Force on Addressing Sexual Harassment within the Organizations of the UN systems ([Task Force](#)) adopted an updated workplan for 2020/21. This supports

11 At 23 September 2021 there were 95 serving and former heads of State/Government members of the Circle of Leadership.

the roll-out of products endorsed by the High-Level Committee on Management (HLCM) and four workstreams: advancing a victim-centred approach to tackling sexual harassment co-led by the Victims' Rights Advocate; learning and communication; outreach and knowledge-sharing; and leadership and culture. The [Manual on Investigation of Sexual Harassment Complaints in the United Nations](#), and document on Advancing a Common understanding of a [Victim-centred Approach to Sexual Harassment](#) within the Organizations of the United Nations were endorsed by the High-Level Committee on Management in May and July 2021 respectively. Further initiatives are included in the [Task Force's 'Initiatives and Progress' Factsheet](#).

investigation; (iv) facilitate victims' assistance; and (v) ensure compliance with personal data protection principles. Roll out of the digital form is ongoing.

3. **Capacity building.** The [IASC Plan for Accelerating Prevention of Sexual Exploitation and Abuse in Humanitarian Response](#) calls for strengthened collective action at country level. During 2021, dedicated PSEA Coordinators provided technical and strategic support to inter-agency PSEA programmes. However, longer-term capacity is required to sustain efforts and to deploy dedicated PSEA expertise from the outset and for the duration of every emergency response.

Challenges and Lessons

1. **Ensuring accountability of perpetrators and justice for victims and survivors remains a challenge.** The United Nations continues to refer credible allegations of sexual exploitation and abuse against United Nations officials and experts on mission to their States of nationality. This can lead to arrests and indictments, but not always.
2. **Gathering, storing and sharing information related to initial complaints of sexual exploitation and abuse.** Building on the paper incident reporting form, developed and piloted by the United Nations since 2017, incident reporting has now been digitalized on a secure web-based application to streamline coordination within the UN system and enhance data protection in the receipt of allegations and follow-up action. This will: (i) streamline and harmonize the collection of intake data related to first allegations/reports of sexual exploitation and abuse; (ii) minimize the number of times a victim/witness is interviewed by UN entities/personnel; (iii) initiate administrative action and or an

Case Study

In September 2020, several media reported on numerous allegations of sexual exploitation and abuse by United Nations and related personnel covering the period of the United Nations response to Ebola in the Eastern Democratic Republic of the Congo from September 2018. Within three weeks, the Chief of the Conduct and Discipline Team in MONUSCO and the Field Victims' Rights Advocate deployed to the area, with the latter seeking to reassure possible victims and provide them with information on available assistance and next steps.

From 25 January to 5 February 2021, the United Nations Office of Internal Oversight Services deployed a team to Beni in the Eastern Congo to interview victims. The Field Victims' Rights Advocate was embedded in the team to provide advice and assistance to victims and ensure that the interviews and related processes prioritized their rights and dignity. Victims appreciated the presence of a dedicated advocate to promote and protect their interests.

Reporting of Cases

The UN publishes [data on sexual exploitation](#) and abuse allegations in real time against all United Nations staff and related personnel, non-United Nations personnel working for implementing partners and non-United Nations international forces authorized by Security Council mandates. In 2020, the total number of SEA allegations received was 387. Of those allegations, 66 related to peace operations and special political missions, compared with 80 allegations reported in 2019; 91 involved UN staff and related personnel and personnel of agencies, funds and programmes, compared with 107 reported in 2019; and 227 related to personnel of implementing partners, compared with 174 reported in 2019. Three allegations of SEA involving members of a formerly deployed non-UN security force were reported.

Next steps

Prevention of sexual exploitation and abuse requires the constant vigilance of all international actors, exchange of best practice and innovative solutions. The United Nations will step up efforts to address the power differentials and inequalities that lie at the root of these inexcusable behaviours, expand the work to embed a culture that rewards those who call out sexual exploitation and abuse, sanction perpetrators and sharpen its focus on risk factors.

3. International Financial Institutions

Introduction

On 18 October 2018, ten International Financial Institutions (IFIs)¹² reaffirmed their commitment to advance standards to prevent Sexual Exploitation, Abuse and Harassment (SEAH). They committed to strengthen efforts to create an environment where SEAH¹³ is rejected and take further steps to address SEAH. The IFIs agreed to maintain and advance standards to prevent SEAH through seven common principles.¹⁴ Recognising that each IFI differs in its policies, procedures and approaches, a snapshot is provided below of the efforts being made by IFIs to deliver on their 2018 commitments and make further progress since the 2020 update. All of the IFIs have since adopted many of these principles internally, both institutionally and in their operations.

Progress: Institutional Measures

1. Capacity building and training for staff.

Most IFIs have been developing and delivering new training programmes aimed at raising awareness and building capacity to respond to SEAH risks. Examples include: mandatory

(online) ‘Ethics’ courses which address sexual harassment; training for teams on the importance of enabling safe environments to speak up; and training materials developed in various languages aimed at implementing partners. One IFI provided in-depth training to its Gender Based Violence and Harassment (GBVH) Focal Points and to environmental and social advisors. Another IFI offers different types of training courses on mitigating SEAH/SH risk, ranging from a five day ‘deep-dive’ to two-hour courses. One IFI also offered training related to procurement and specifically contractor accountability for SEAH.

2. Development of Apps and other IT based ways of encouraging reporting.

There has been innovation in both delivering training and providing anonymised ways of reporting on SEAH. One such example is a secure web and mobile app allowing for anonymous reporting by both internal and external persons. Another IFI has developed an automated and autonomous tool for confidentially and anonymously reporting and addressing incidents of harassment (including SEAH), abuse of power and

¹² Asian Development Bank, African Development Bank, Asian Infrastructure Investment Bank, European Bank for Reconstruction and Development, European Investment Bank, Inter-American Development Bank, International Finance Corporation, International Fund for Agricultural Development, International Monetary Fund, and the World Bank.

¹³ Note that, as SEAH is seen as a form of gender-based violence, most IFIs refer to the risks around SEAH in their operations under the umbrella of gender-based violence and harassment. Thus, the term GBV or GBVH is sometimes used throughout this update report, interchangeably with SEAH.

¹⁴ **Principle 1:** Foster a culture of respect and high standards of ethical behaviour across institutions; **Principle 2:** Establish and maintain standards aimed at preventing sexual harassment, abuse, and exploitation and other forms of misconduct; **Principle 3:** Provide a safe and trusted environment for those affected by sexual harassment, abuse and exploitation to step forward to report incidents and concerns, with the assurance that they will be treated respectfully and consistently; **Principle 4:** Provide protection for those affected, as well as whistle-blowers and/or witnesses within their institutions, and to take appropriate measures against any form of retaliation; **Principle 5:** Maintain robust policy frameworks and clear institutional mechanisms that address how incidents and allegations will be handled should they arise; **Principle 6:** Provide effective training programs so all staff understand the requirements and standards of behaviour expected of them as international civil servants and; **Principle 7:** Support clients to develop and implement policies and mechanisms that address sexual harassment, abuse and exploitation.

discrimination. The tool has an interactive platform, which uses artificial intelligence to interact with employees on their concerns and is supported by training to build employees' capacity to report SEAH.

3. **Creation of new positions and enhancement of policies.** A couple of IFIs have enhanced their procurement policies/standard bidding documents to include references to SEAH/SH. One IFI has created new positions to act as additional resources to help staff address and resolve harassment and sexual harassment cases that fall short of misconduct. This allowed the institution to lower the threshold to trigger an institutional response for situations involving sexually harassing behaviours. A further example is provided in the box later in this section.

Progress: Operational Measures

1. **Development of new guidance materials.** Over this last year, most of the reporting IFIs have been developing guidance and resource materials for their own operations. These have ranged from: 'Good Practice Notes' on preventing, mitigating and responding to SEAH in financed operations; to the development of tools to identify and mitigate risk of SEAH/SH in projects. A couple of IFIs have collaborated on a publication to disseminate emerging good practice in addressing GBVH in the private sector. To help specialists and clients prevent and respond to SEAH, prioritising safety and support to survivors and whistle-blowers, one IFI has updated and tailored GBVH assessment tools to specific sector contexts, also producing guidance documents and "tip sheets" to help tackle SEAH/GBV in its investments.
2. **Enhancement of safeguard policies and procedures.** Several IFIs have enhanced or are in the process of enhancing their

respective Environmental and Social Policies to better address SEAH/SH risks. One IFI has been focused on the roll-out of its internal procedures for GBVH screening, assessment and monitoring of direct investment projects and the reporting protocols for project related allegations and incidents. A couple of IFIs have also updated their procurement documents to include reference to SEAH/SH. One IFI has altered its financing conditions to include references to its SH/SEA policy.

3. **Improved risk assessment of SEAH/SH.** Several IFIs have been developing and/or rolling out new risk assessment tools to strengthen identification of risks associated with GBV, including SH and SEA so that appropriate mitigation measures can be applied. For example, one IFI launched an internal online SEA/SH Risk Screening Tool for its operations with major civil works; projects apply the online SEA/SH risk-screening tool to determine the level of risk and include appropriate and proportional mitigation measures in project operations, taking into account both the rating from the tool as well as the Environmental and Social Assessment (ESA), with inputs from community consultations. Further tools are being developed for other sectors.

Challenges and Lessons

1. **SEAH Working Group.** In November 2020 ten IFIs shared their respective experience and launched a dedicated group—the SEAH Working Group—to collaborate and coordinate among and between institutions whose policies and procedures may differ in scope and approach. Two sub-groups were created to focus on the creation of a knowledge platform and the development of a pilot for country collaboration around specific investments or thematic areas. The platform is intended to facilitate communication, share

external resources developed by the IFIs and support the development and/or sharing of practical tools and training. The aim of the country collaboration is to pilot harmonisation mechanisms through jointly developed practical interventions. This may include supporting clients with the development of prevention and response policies and procedures, providing training to public and private sector borrowers, or capacity building of civil society/support services among others.

2. **COVID-19 has increased GBV/SEAH risks.** During the COVID-19 Pandemic, GBV including SEAH risks have increased. However, the continuation of the COVID-19 Pandemic with its related travel restrictions has made it more difficult to collect data, monitor and to conduct the type of on-the-ground investigations ordinarily carried out. In addition to the standard helplines, confidential email address and Mobile WhatsApp enabled mobile helpline, one IFI has trained dedicated staff in various duty stations to perform the role of SEA focal points. They liaise on the ground with stakeholders and implementing partners and serve as an additional complaint mechanism to receive reports of SEA. One IFI has published a [series of case studies](#) exploring client approaches to GBV prevention and response.
3. **Promoting a 'speak-up' culture'.** A common challenge that IFIs have faced has been in promoting a 'speak-up' culture within their own organisations. This has been made more challenging in the context of remote working and is expected to also be challenging in hybrid work environments. IFIs have taken various approaches to address this. One IFI has developed a programme that uses virtual-reality technology, affording participants the opportunity to strengthen their skills in a safe space and get guidance to improve their handling of sensitive situations involving their employees. A few

IFIs have been raising awareness of the risks related to working from home and the prevention of harassment, while another IFI has promoted awareness for employees to understand measures taken to prevent retaliation for reported SEAH cases. Another IFI has planned a series of learning products, including e-learning for all staff and capacity building for its senior leadership.

Case Study

For the first time, in late 2020, one IFI implemented a new feature of the revised Dignity at Work Policy i.e. the possibility to initiate a case ex officio. This means that the IFI administration may decide to initiate a formal inquiry procedure of its own initiative to establish the existence of harassment, following a preliminary assessment.

At the end of 2020, the IFI used this tool for the first time and launched an ex officio formal procedure of inquiry. The IFI had gathered prima facie evidence of sexual harassment and, although the alleged survivor did not wish to file a complaint, the IFI believed that the evidence collected merited a formal inquiry given the potential harm to others. As such, the IFI administration launched the procedure while prioritising the protection and wellbeing of the survivor. The formal inquiry procedure is still ongoing.

This example illustrates this IFI's commitment to support alleged survivors of sexual harassment, demonstrating its duty of care towards staff and its proactive approach to ensure the adherence to high standards, notably its zero-tolerance policy towards SEAH.

Reporting of Cases

There was an overall downward trend in reporting across the IFIs. However not all reporting years for IFIs are the same as some institutions report by fiscal year and others by calendar year. Therefore, the aggregates below capture two years' worth of data, but not necessarily the same months. In addition, not all investigations are concluded in the same year that the report was prepared, and so some conclusions and follow-up information may relate to cases reported in previous years. The latest consolidated number of cases reported in the considered timeframe is 15.

- » All organisations except one reported only on cases which related to their staff. Just one IFI reported on a case related to a project;
- » 7 cases were found to be unsubstantiated, 3 cases were substantiated and two are ongoing; and
- » 5 staff were warned and 2 were dismissed.

Next steps

Over the next year most IFIs will be prioritising capacity building and training of both staff and clients, as well as continuing to embed and recognise GBVH as a key priority of target strategies and approaches. This will include the provision of more guidance and compulsory training programmes. Many IFIs will be focusing on the operationalisation of their policies and tools and provision of support to returning staff. All IFIs will participate in the ongoing progress of harmonising and aligning Multilateral Financial Institution approaches to address SEA/SH in their operations.

4. UK NGOs

Introduction

On 18 October 2018, UK international development non-governmental organisations (NGOs) presented [a set of commitments to tackle sexual exploitation, abuse, and harassment \(SEAH\)](#). These were developed by Bond, in consultation with its members, and set out NGOs' approach to improving the quality and consistency of their safeguarding practices. The safeguarding commitments form part of the Bond charter, which all Bond members sign up to. Since those original commitments were made Bond and members have produced [a set of case studies](#), to complement the commitments and demonstrate how the NGOs implement the commitments and drive forward leadership on safeguarding. Two important initiatives conceptualised by the NGO safeguarding working groups and which are part of the NGO commitments have come to fruition in 2021 (see first two progress points below).

Progress

1. **Safeguarding leadership and culture.**

March 2021 saw the launch of the Safeguarding Leadership tool “Developing and modelling a positive safeguarding culture: A tool for leaders.” This is a discussion-based tool to support leaders of organisations to understand what a positive safeguarding culture looks like. It also helps leaders to assess their organisational culture in relation to safeguarding and develop clear actions to help prevent all types of harm, including sexual exploitation, abuse and sexual harassment (SEAH). The Safeguarding Leadership and Culture Working Group has also launched a related tool “Understanding effective safeguarding culture” to help facilitate conversations at all levels within organisations to improve the collective understanding of

what constitutes a positive safeguarding culture. Several organisations and CEOs from the Bond membership are acting as “champions” to encourage uptake by working through different sections of the tools and sharing their experiences and learning of using them. The working groups have continued to drive engagement, now arriving at a stage of ‘first findings’ in this longer-term strategy of embedding safeguarding culture.

2. **Local partners initiatives.** Last year’s CSSG report noted that ‘NGOs require further support to work with partners on safeguarding.’ In response, the Safeguarding Accountability Working Group has become a Safeguarding Partnerships and Local Leadership Group. The group was formed in response to a shared concern that there is little recognition of the existing safeguarding expertise within local partner organisations and locally led approaches, resulting in insufficient resources dedicated to this area. Objectives include increasing the understanding of participatory approaches, increasing investment from donors in locally led initiatives that build on expertise from within communities and strengthening learning around locally led approaches. The working group now includes local partners, is setting up an online learning forum open to all partners and plans to commence a dialogue with FCDO on safeguarding, with a focus on Due Diligence later this year.
3. **Increased cross-sector collaboration on safeguarding.** Following the 2018 commitment to collaborate with others on safeguarding, the initiative to collaborate, share best practice and expertise continues. Bond saw record attendance at its 2021 online conference with over 350 participants in the Safeguarding session on “A leader’s role

in building safe organisations". In August, 410 individuals attended a joint webinar hosted with the Charity Commission of England and Wales and FCDO. Throughout the year, 388 individuals participated in the safeguarding working group, and whilst the co-chairs groups from 2018 stepped down, two new groups formed to lead sector collaboration in the Safeguarding Steering Group and the Partnerships and Local Leadership Group. The recent Bond Survey showed that 97% of respondents had engaged in Bond's safeguarding activities or events or used Bond's resources for safeguarding and 87% of respondents reported that they had successfully applied that knowledge in their organisation.

Challenges and Lessons

1. **Reporting of cases and sensitive reporting mechanisms.** The number of incidents reported to organisations in 2021 compared to 2020 remained largely the same. About 21% of respondents saw an increase; this is encouraging as it shows trust in reporting systems and that action will be taken in response to concerns. Organisations told Bond that they did not know if this accurately reflected the number of incidents, or if the number felt too low. Either way it is clear that a priority in the coming year must remain identifying how best to embed reporting mechanisms which communities trust and which encourage a culture of speaking up.
2. **Ensuring good safeguarding practice makes a difference to communities.** The 2021 Bond survey showed that 92% of respondents reported that they had seen progress towards better safeguarding practice in their organisation over the last year. That figure was however only 50% when asked if improvements to safeguarding practice

result in a positive impact on communities, victims and survivors, the same figure as in 2020. This indicates that more needs to be done to ensure good safeguarding practice and processes developed at UK level leads to safer outcomes for all. UK NGOs require ongoing best practice guidance, peer support, cross-sector collaboration, and training to disseminate the progress they have made in better safeguarding practice to their local partners and programmes using locally-led initiatives and question-led approaches.

3. **Country-specific advice and guidance.** The type of support organisations have mainly requested from Bond recently is country-specific advice and guidance on improved partner support in safeguarding. Many organisations reported that an improved understanding of local context and culture was a priority, helping members to maintain good standards in safeguarding practice whilst at the same time adapting to local context to ensure the work is effective.

Case Study

Over the past year, the post-2018 Global Summit ‘Accountability Working Group’, has reformed and adapted to tackle one of the key sector objectives also highlighted by the Bond Safeguarding survey; meeting the challenge of ensuring best practice in safeguarding is applied downstream, resulting in a positive impact on communities, victims, and survivors.

The Safeguarding Partnerships and Local Leadership group formed early in 2021 in response to a shared concern that there is little recognition of the existing safeguarding expertise within local partner organisations and insufficient resources are dedicated to this area. This can result in complex yet inadequate safeguarding systems, which work on paper but not in practice, developed with insufficient collaboration with those living in contexts that put them at greatest risk of abuse and exploitation.

The terms of reference were agreed in March 2021, and only one group objective was set (Safeguarding Due Diligence), on the principle that further objectives would be set by partner organisation group members. The objective therefore had two aims:

- » To work in collaboration with FCDO and other donor due diligence and safeguarding frameworks so that they incorporate understanding of local contexts, are applied proportionately, and enhance learning and development, moving beyond paper-based exercises to genuinely improved safeguarding practices.
- » To use the objective-setting process to open the UK-based working group to partners from the global south, creating a safe, collaborative space (both within the working group and through a new Bond online discussion forum with no pay-barrier to partners), recognising local expertise and building a strong evidence base that a participatory approach makes environments safer for the most marginalised people.

The first working-group meetings including partners to discuss due diligence took place in June and July, leading to meetings with FCDO with a view to participate in the reviewing and inputting to new FCDO Due Diligence guidance with partners and to address the problem of how to ensure good practice are disseminated from UK NGOs to their partners downstream.

Reporting of Cases

Bond's recent safeguarding survey asked respondents how the number of safeguarding incidents reported to their organisation compared to the previous year. 69% of the 102 respondents said that the number of incidents reported remained the same (a 15% point increase on the previous year). About 21% of respondents saw an increase (almost half of last year's figure), and 11% a decrease.

When comparing this year's results to 2020, the survey showed that most organisations still do not report the total number of cases publicly. When asked why, most organisations not reporting felt they need a standardised approach and further guidance to do so. In response to this ongoing challenge the FCDO project to standardise reporting across the sector should prove useful. Also, initiatives such as the recent Bond event hosting the Charity Commission and FCDO to share guidance in ongoing improvements in the humanitarian sector, which experienced record attendance numbers, signalling the interest and appreciation of the sector, can help NGOs gain confidence and experience in reporting incidents.

Next steps

Priorities for 2021-22:

- » **Bond Safeguarding Steering Group.** This newly formed group is currently developing objectives and activities for the coming year, prioritising a collaborative approach across the sector. The activities will probably align with some of the challenges raised above, as well as including further work on the leadership tool and culture.
- » **Bond Safeguarding Partnerships and Local Leadership Group.** The group will move forward in including local partner organisations both in group meetings and a free online platform, meeting the challenge

of prioritising local safeguarding expertise and helping to support members in ensuring safeguarding practice is effective in local contexts.

- » **Bond Safeguarding Leadership Tool.** Bond will continue to encourage sector engagement with the leadership tool and to support leaders of organisations to understand what a positive safeguarding culture looks like. The tool will help leaders to assess their organisational culture in relation to safeguarding and develop clear actions to help prevent all types of harm, including SEAH.

5. UK Private Sector Suppliers

Introduction

The Safeguarding Leads Network (SLN) was established in May 2019. Membership (now standing at 22) is open to private sector implementers of UK ODA programmes who have signed the private sector commitments to prevent and respond to sexual exploitation, abuse, and harassment (SEAH) presented in October 2018. Meeting bimonthly, the SLN provides members with a forum to monitor progress, share lessons, improve practice, and build technical capacity. The SLN and its members work closely with the FCDO, the CSSG, other bilateral and multilateral development organisations and NGOs. SLN learning and information-sharing events now take place online and are open to non-members. Attendance at meetings and feedback on the SLN are good. Over 100 individuals joined each of the last two sessions. The SLN has prepared this progress update on behalf of its UK private sector supplier membership.

Progress

Fifteen members (68%) completed a survey on progress. Feedback indicates that these are the members who considered themselves to have made significant progress and reflects a substantial investment by SLN members, despite continuing constraints relating to the COVID-19 pandemic and cuts in the ODA budget.

SLN members identified the following as the top three areas of progress against the challenges identified in 2020:

1. **Investment in training staff, contractors, and partners.** All respondents have invested in this area over the last year, with efforts including:

- » assessing the level of current staff members' knowledge to identify gaps and assess onboarding procedures;
 - » developing mandatory onboarding trainings, often with a requirement for an annual refresh as well as more advanced trainings for field offices and investigators;
 - » using off-the-shelf training materials (purchased and free), online courses, and self-taught trainings to reduce the burden of delivering live training;
 - » including safeguarding trainings in programme budgets, but noting that this is primarily for projects working with vulnerable populations or focused on safeguarding; and
 - » using due diligence mechanisms to identify safeguarding training needs for downstream partners.
2. **Adapting reporting mechanisms and opportunities to speak up to local contexts.** 94% of respondents had invested in improving reporting mechanisms in the last year in three categories:
- » learning from field-based staff and experience (44%). SLN members are increasingly engaging local safeguarding focal points. This helps to improve and increase the range of contextualised reporting mechanisms, allows for targeted support to the focal points and creates more effective communication channels with downstream partners;
 - » strengthening systems at head office level (19%) including by updating policies and standard operating procedures, establishing systems to track complaints and providing refresher trainings; and

- » strengthening systems at field level (31%) including through training field teams on reporting and setting up rapid referral mechanisms.
3. **Survivor-centred response.** 69% of SLN members surveyed have implemented some actions over the past year to enhance their ability to provide a survivor-centred response. These include:
 - » improved investigations through training or contracting external investigators;
 - » training for relevant staff on survivor-centred approaches;
 - » mapping services in-country; and
 - » provision of mental health / counselling services to in-house survivors.

Challenges and Lessons

SLN members identified a range of challenges. The top three are interlinked and are also reflected in members' reported progress, indicating that they are increasingly committed to improving standards and learning from previous experience.

1. **Reporting mechanisms.** This is the stand-out most referenced, continuing challenge. SLN members are concerned that reports of SEAH remain low. The steps identified above are likely to bear fruit over the next 12 months. Other initiatives underway include addressing organisational cultural issues that may deter staff from reporting and improving communication at community level. This issue also relates to the need for training and capacity-building with downstream partners who are the ones most frequently in touch with communities. SLN members also stated that their investment in conducting rigorous investigations and providing survivor-centred support to individuals builds trust and is likely to improve levels of reporting.

2. **Training staff and partners.** While SLN members are aware that training is not a panacea for all problems, it is regarded as crucial for organisational cultural shift, for communicating reporting lines and non-retaliation policies and for embedding zero-tolerance towards SEAH. Respondents noted that training must be mandatory; included in on-boarding (staff) or at the start of contracts/ grant agreements; and be repeated. Members also state that the budget cuts to ODA programming can threaten the level of capacity-building provided to partners' staff members.
3. **Survivor-centred response.** As noted above, SLN members are addressing the practicalities of implementing survivor-centred response. Issues include: a lack of referral mechanisms and the need for trained, available investigators but the main issue remains the low level of reporting. SLN members regard improving reporting as critical to improving survivor-centred response and to learning what works best. *"...achieving a genuine survivor-led response remains an aspiration rather than a reality, not least because reporting levels are manifestly below expected rates so we are confident that many cases are going unreported and unresolved"*.

SLN members are also aware that survivor-centred response mechanisms need to be tailored to the context and to the particular type of victimisation (whether sexual harassment at work, sexual abuse or sexual exploitation). Linked to survivor-centred response, SLN members identified 'safe programming' as an emerging challenge, noting that this has to be built in at the proposal stage and that clients' buy-in for safe programming is key.

Case Study

A report was made concerning inappropriate and unacceptable behaviour towards colleagues by a senior member of staff. Only one instance of this person's inappropriate behaviour was escalated to the Human Resources (HR) department, despite several people having raised their concerns directly to other senior managers. Those who had raised concerns said that they felt unable to escalate their concerns further due to the significance of the projects that the senior manager was assigned to. Initially the inappropriate behaviour was downplayed by other senior staff as 'quirky' or 'funny'. This delayed identifying the behaviour as inappropriate and unacceptable and delayed action being taken. Upon the escalation to HR, however, a full investigation was undertaken, the result of which was the termination of the individual's contract. The organisation used this as an opportunity to provide training to all staff on inappropriate behaviour and reporting.

- » lack of uniformity across the sector, such as how cases are labelled, when a 'report' is a 'report' or a 'concern';
- » there is no central data-base or collection point;
- » diversity of the sector and the nature of SLN members' work. For instance, where member organisations do other work besides ODA spend (e.g. accountancy or infrastructure), it may not be feasible to disaggregate which reports of SEAH are 'in the aid sector';
- » lack of knowledge and expertise in the sector; and
- » data protection, confidentiality and other reasons for reluctance to share information.

Some members also agree that data collection should be focused on perpetrators, rather than reports by victims/ survivors; that this gives a clearer picture of prevalence and removes reliance on survivors coming forward.

SLN members recommend that they are included in the initiative by the FCDO to address constraints with data-collection.

Reporting of Cases

66% of SLN respondents report that reporting numbers have stayed the same in the last 12-month period. None reduced and only three (20%) reported an increase. The circumstances of the past year mean that it is possible that the nature of reports changed (more reports of sexual harassment and fewer of sexual exploitation, for example). The overall number of reports remains low across the SLN membership, however. It is not clear whether all reported cases relate to the organisation's own personnel (as victims or perpetrators).

Collecting systematic and consistent data across the sector remains difficult. Reasons include:

- » resource constraints: at a time of budget cuts, organisations cannot afford to prioritise this use of resources;

Next steps

The need for organisational capacity-building remains and SLN members echo previous years' recommendations for sharing good practice. In line with the SLN ethos of prioritising the commitments over organisational self-interest, members recommend jointly developing training and other capacity-building.

SLN members are keen to take advantage of and learn more about recent developments such as the Misconduct Disclosure Scheme and Project Soteria. Understanding and implementing survivor-centred responses is a strongly emerging theme for organisational and cross-sector capacity-building.

Existing members also want the membership of the SLN to increase and would welcome the FCDO encouraging private sector suppliers to engage more with safeguarding against SEAH.

6. Research Funders

Introduction

In 2018, five UK funders¹⁵ of international development research jointly committed to raise safeguarding standards across the sector, in order to prevent and tackle all incidents of harm and abuse, including sexual exploitation, abuse and sexual harassment (SEAH), building on existing good practice. Over the past three years, these funders have worked closely with the UK Collaborative on Development Research (UKCDR) to develop guidance on how to raise safeguarding standards across the sector which was published in April 2020. Since the joint commitment, UK research funders have been working together and within their organisations to develop and implement their safeguarding policies and guidance.

Progress

1. Continued commitment to implementation of safeguarding policies and practices.

Since the publication of the UKCDR safeguarding in international development research guidance last year, UK research funders have continued to demonstrate commitment to raising safeguarding standards across the sector, despite the challenges of COVID-19 and changes to the UK Official Development Assistance (ODA) budget. Over the past year, the Department of Health and Social Care (DHSC)'s National Institute of Health Research (NIHR) have expanded their safeguarding guidance developed last year for ODA-funded research contracts, to launch a "Preventing Harm in Research" policy, which includes safeguarding and applies to all NIHR funded research (domestic

and global). Safeguarding clauses are now included in all NIHR research contracts, requiring award-holders to have safeguarding policies in place. Additionally, NIHR developed tailored training, led by BOND, to support their safeguarding leads and wider staff with effective implementation of the policy (see case study) and have incorporated safeguarding in assurance training workshops offered to ODA award-holders. Additionally, the Department of Business, Energy and Industrial Strategy (BEIS), now require delivery partners to use reasonable endeavours to ensure safeguarding policies are in place and report all safeguarding disclosures to BEIS. Furthermore, the Wellcome Trust is developing an organisation-wide safeguarding action plan outlining key safeguarding activities to be implemented across the organisation, has become a member of the new Funder Safeguarding Collaborative, and recently recruited a new safeguarding lead. Similarly, UKRI has recently recruited a new safeguarding lead who will focus on implementing their safeguarding policy over the next few years. Within FCDO, safeguarding remains high priority, and is included in all agreements and memorandum of understandings, and all teams undertake enhanced due diligence of funded organisations, including research institutions.

2. Increased institutional awareness and readiness for uptake of safeguarding guidance and policies across the research community.

Since the launch of the UKCDR guidance on safeguarding in international development research last year, and the development of UK research funders' safeguarding guidance, policies and

¹⁵ The Department of Business, Energy and Industrial Strategy (BEIS), The Foreign Commonwealth and Development Office (FCDO), The Department of Health and Social Care (DHSC), Wellcome, UK Research and Innovation (UKRI).

plans, there has been growing institutional awareness of safeguarding and uptake of guidance across the research community. In 2020, in partnership with Universities UK International, BEIS led a series of roadshows across UK universities in which UKRI safeguarding policies, and UKCDR's guidance on safeguarding was highlighted to the research community. Additionally, more UK universities now have safeguarding leads and safeguarding pages on their websites with links to funder policies and UKCDR's safeguarding guidance. These include the University of Sheffield, Imperial College London, the University of Cambridge, The University of York, The University of Bristol, The University of St. Andrews and Liverpool School of Tropical Medicine. Furthermore, the UKRI financial assurance and due diligence team undertook an audit of research institutions' readiness for implementation of safeguarding policy, and found that within research institutions, there is broad awareness and readiness for implementation of UKRI safeguarding policy. The FCDO-funded Resource and Support Hub also recently hosted a [webinar on safeguarding](#) in international development research, which has now received over 100 views.

3. **Institutional support for safeguarding by senior stakeholders within organisations.**

To ensure effective culture change on safeguarding across the sector, buy-in from senior leadership is pivotal. Within research funding organisations, there is increased institutional buy-in at senior levels. Within some research funding institutions, senior management teams have requested regular updates on ongoing safeguarding cases, highlighting continued interest and buy-in. At Wellcome, a 'deep dive' on safeguarding was presented to the organisation's Audit and Risk Committee. As a result, Wellcome is exploring designating one of its governors (trustees) with a specific oversight remit for safeguarding

at the board level, ensuring that safeguarding remains a key governance priority. Over the next year, as funders continue to implement policies, practices and plans, they will be seeking to ensure sustained or increased buy-in from senior stakeholders, who have a unique ability to change research culture, set the tone and raise safeguarding across the international development research sector as a whole.

Challenges and Lessons

1. **Understanding the impact of safeguarding activities across the international development research community.** Whilst there is increasing awareness and uptake of safeguarding in the international development research sector, a remaining challenge is understanding the impact across the sector. This is particularly challenging given the large number of research institutions which undertake international development research. As such, it may be useful to consider how to holistically capture the broad impact of the UKCDR safeguarding guidance, and UK research funders' policies and guidance. UKRI, Universities UK and Wellcome Trust have recently commissioned a supplier to explore evidence on coverage, adoption and impact of select concordats and agreements, which includes the UKCDR safeguarding guidance. As such, this project may provide useful insight into adoption and impact of the safeguarding guidance across the sector. Publication date for this report will be Autumn 2021. At a cross-government level, and beyond the research sector, FCDO will be operationalising the M&E plan behind the cross-government safeguarding strategy to understand the impact of overarching cross-government safeguarding activities.
2. **Impact of UK ODA cuts to research on safeguarding activities.** Whilst commitment

to safeguarding and implementation of policies and guidance remains high, the 2021 cuts to ODA research and development (R&D) have impacted some elements of operationalisation of safeguarding policies. Within some research funding institutions, and the institutions they fund, cuts to UK ODA R&D have resulted in resources being pivoted to support researchers address these cuts, and many in the research community have had to restructure their research project in response. Combined with the continued impact of the pandemic, this means there has been some delay in implementation of elements of the safeguarding policies within institutions, and a need for sensitivity of the strain placed on the research community as a result. However, research funders are committed to ensuring that changes to research projects do not impact safeguarding and will be proactively working to ensure safeguarding standards remain high and that relevant policies and guidance are implemented to ensure that all of those involved in the research process are safe from harm.

3. **Ensuring clarity about safeguarding definitions, roles and responsibilities.** Whilst the UKCDR guidance supported funders to develop a harmonised definition of safeguarding across the sector, translation of safeguarding on the ground and in some institutions remains a challenge for some organisations. Therefore, funders will continue to communicate the issues encompassed within safeguarding in the context of international development research across their own institutions, and within the research institutions they fund in the UK and internationally. Some funders also highlighted a need to continue to clarify internally and externally, roles and responsibilities of UK research funders and institutions in responding to safeguarding issues. Across the majority of UK research funders, responsibility for enforcing safeguarding policies primarily lies

within research institutions, with funders being kept abreast of investigations and cases. Research funders will continue to clarify and communicate this to institutions as policies are implemented to ensure lines of responsibility are clear to all.

Case Study

One of the challenges highlighted in the 2020 progress report was the need for training on safeguarding to support effective implementation of safeguarding guidance and policies in the international development research sector.

In 2020, DHSC commissioned BOND to develop bespoke training for NIHR Programme Managers and Safeguarding Leads responsible for supporting contractors on safeguarding issues. The training supported the implementation of the NIHR Safeguarding Guidance and provided attendees with a better understanding of the DHSC requirements and best practice guidance in safeguarding. The training outlined the definition of UKCDR safeguarding in the international development research sector. It involved discussions of scenarios about how to anticipate, mitigate and address safeguarding issues, with a focus on prevention, case management and taking a survivor-centred approach. In addition, NIHR opened this training to UKRI and Wellcome colleagues, demonstrating continued cross-funder collaboration on safeguarding.

This training ensured greater understanding of safeguarding across NIHR staff, will support more effective and harmonised implementation of the policy and ensure that safeguarding remains a priority across the organisation. Since then, NIHR has also held a follow up

workshop with contractors on how to better support safeguarding across their activities.

Reporting of Cases

Collecting harmonised and aggregated data across the entire international development research sector remains a challenge, as there is currently no standardised approach to reporting cases or collection of safeguarding data across all UK research institutions. Some funders have detailed reporting mechanisms in their policies, whilst others are in the process of establishing them as they implement their safeguarding policies and plans. Since 2020, cases have been reported, potentially indicating that established reporting mechanisms are effective. In general, investigation of cases is the responsibility of research institutions rather than funders. However, most research funders' policies stipulate that cases should also be reported to them, to ensure they are aware of ongoing cases and investigations. NIHR for example, has now developed incident reporting forms to allow institutions to report cases directly to them. These also allow anonymous reporting of cases in the event of incidents where institutional reporting mechanisms may not be appropriate. FCDO have recently launched a survivor's support programme, which will provide an anonymous portal for survivors to report safeguarding incidents. This may also be of relevance for other research funders to explore.

Over the next year, research funders will be continuing to implement their policies and guidance and working to ensure research institutions are aware of these policies and report cases using established mechanisms. Funders will also continue to ensure research institutions develop their own policies and reporting mechanisms, ensuring a survivor-centred approach. Research funders will also be considering how to best collate data across the sector, or to share information on cases whilst

ensuring data protection. This is likely to be a medium to long-term endeavour.

Next steps

- » **Continued implementation of safeguarding policies, guidance and action plans.** Research funders are at different stages of implementing safeguarding policies, guidance and action plans, and over the next year will continue to implement safeguarding activities, reporting mechanisms and communicate these to the research community.
- » **Collaboration and sharing best practice across research funders.** Coherence across research funders, and engagement with other funders working implementing safeguarding policies and practices has been beneficial in supporting sharing of best practice. Forums such as the UKCDR safeguarding funders group, the Safeguarding Funders Collaborative and FCDO's cross-HMG safeguarding working group have been useful in facilitating this. The role of the Safeguarding Unit has also been invaluable to research funders, in providing advice, facilitating information sharing and training. Over the next year, UK research funders will continue to participate in similar fora and engage with each other to facilitate information sharing of how to effectively operationalise policies, plans and guidance.

7. CDC

Introduction

In October 2018, CDC Group, the UK's development finance institution (DFI), made a set of commitments to tackle sexual exploitation, abuse and harassment (SEAH) in the development finance sector. CDC's commitment to ensuring that it has robust safeguarding¹⁶ measures has continued to evolve over the past year and has involved regular reporting on CDC processes and incident management to CDC's Board (which receives progress reports on the work being carried out to implement the commitments) as well as FCDO staff. Below is a summary of progress over the past year (September 2020-September 2021).

Progress

1. **Safeguarding incident management procedure.** In line with its survivor-centred approach to safeguarding, CDC has developed and implemented a safeguarding incident management procedure which sets out how to assess, escalate, record, report and work with investees to manage safeguarding incidents in CDC investments. As well as providing a mechanism for informing CDC of incidents, the procedure aims to minimise the likelihood and impact of safeguarding incidents, for both individuals and business operations, and ensure these are resolved in a way that protects all parties (particularly victims/survivors of SEAH). It also provides an important way through which CDC can improve and enhance responses over time through the analysis of trends and incident data.

The importance of this has been underscored by the impacts of COVID-19 (see below) and CDC recognises the increased likelihood of GBVH across CDC's portfolio as a consequence of the pandemic. CDC continues to promote the good practice materials it has developed (briefing note on mapping gender risks in CDC's investment sectors and geographies, good practice guidance on addressing GBVH for the private sector) with its portfolio to further this understanding.

2. **Building capacity and commitment to addressing GBVH in CDC investments (and broader engagement with external parties).** CDC has continued to build capacity internally including through mandatory GBVH training for all staff, and more specific training to specialists (including the CDC Environment Social and Governance (ESG) team). A Board member (Mrs Dolika Banda) continued to serve as Board safeguarding champion (she was appointed in March 2019). The primary objective of this role is to encourage awareness raising of safeguarding issues at the Board, helping CDC maintain the highest levels of active engagement and promote best practice on safeguarding. CDC has also continued to promote GBVH as a key issue for European DFIs to be aware of and integrate into due diligence and portfolio management.
3. **CDC's Gender-Smart Investing Strategy.** Advancing women into greater positions of authority and decision making is critical to addressing the underlying power dynamics which play out as a key driver of GBVH.

¹⁶ For CDC, safeguarding comprises risks associated with gender-based violence and harassment (GBVH), as well as modern slavery and child exploitation and abuse. For the purposes of this report, CDC is reporting progress only on the GBVH dimensions of its safeguarding agenda.

CDC's Gender-Smart Investing strategy is a corporate priority, which focusses on actively supporting investees to promote women's participation as business owners; corporate leaders; valued workers and consumers.

As part of this work, CDC is a founding member of the [2X Challenge](#). The 2X Criteria considers GBVH as critical factors when assessing whether an investee is 2X eligible and therefore characterised as a gender smart. CDC has been looking at how best to integrate GBVH requirements into decisions about 2X eligibility so as to ensure that appropriate safeguarding controls and commitments are evident. Investee-level support provided by CDC is often focused on driving enhanced diversity and inclusion within the workforce, which is critical to tackling systemic power imbalances which contribute to GBVH. Support includes technical assistance and bespoke advisory to run diagnostics, developing gender action plans and other activities to support the empowerment of women in the workplace.

CDC recently published a [Gender Toolkit](#) which provides detailed guidance and a range of resources to promote gender equality through investment activity including a dedicated section on how to improve gender diversity in the workplace. CDC has also partnered with the [Financial Alliance for Women](#), a leading global network of financial institutions dedicated to growing the female economy. One output of this partnership is a *Guide to becoming an employer of choice for women*, to ensure diversity and inclusion is embedded in practice.

CDC's work implementing the Gender Strategy has also been heavily focussed on increasing the representation of women across the investment ecosystem. Alongside 24 other members, CDC has recently launched the [2X Collaborative](#)—a new global

industry body that convenes the entire spectrum of investors to promote 'gender lens' investing.

In addition to work with our investment portfolio and recognising that SEAH results from power imbalances, CDC itself committed in 2018 to improve the gender balance within its senior management. As of September 2021, 35% of director roles and above were filled by women—up from 32% in September 2020. In response to the organisation's good progress towards meeting its original corporate objective—to increase the percentage of women in senior roles to 34-36% by 2023—the Executive Committee agreed in 2021 to raise this objective to 40% by 2023.

Challenges and Lessons

1. **CDC's support to investees on safeguarding requires further staff capacity-building and training.** CDC recognises a continuing need to build and reinforce internal capacity (including with deal teams who may become aware of incidents) to ensure confidential and victim-centric responses. The challenges created by COVID-19 (referenced in last year's report) continue and CDC has also noted increasing capacity constraint in the availability of external GBVH consultants (in part because of increased demand for these services across the DFI community).
2. **Increased reporting, leveraging and learning from incidents.** As CDC builds out its data base of incidents it is able to leverage data on trends (for example, industry sectors or operating circumstances that generate higher likelihood for incidents) that can be built into due diligence and portfolio management, as well as targeted training and capacity building. Investees with a reporting system in place report higher numbers of incidents. While these incidents are important

data to consider, it does not imply that GBVH risk in the countries/sectors where these incidents were reported are necessarily higher than other geographies/sectors where CDC invest. For example, our Indian investees generally report a higher number of incidents. As a response to this, CDC will continue monitoring trends to support the design and implementation of our GBVH prevention practices to more effectively target investments where the risk is the highest and evaluate the impact of our risk mitigation practices.

3. **COVID-19 continues to exacerbate safeguarding risks.** Travel restrictions further limit the ability of CDC staff to visit investments and affect the extent to which CDC can directly support companies in assessing and managing safeguarding risks and issues, placing additional expectations on local consultants. CDC has also noted increasing capacity constraint in the availability of local GBVH consultants. In response to this latter challenge, CDC is working with other European DFIs to roll out a local capacity building program for consultants (which will include training on GBVH).

Case Study

CDC has started to build our investees' capacity through dissemination of our guidance and raising awareness on CDC's reporting and escalation procedure. For example, in the past year, CDC has continued to refine and strengthen legal language and reporting requirements for investees and to use its workshop programs to discuss GBVH risks and management with fund managers and other investees.

We note that investees with a reporting system in place report a higher number of incidents. We have learned that while these incidents are important data to consider, it does not imply that GBVH risk in the countries/sectors where these incidents were reported are necessarily higher than other geographies/sectors where CDC invest. For example, our Indian investees generally report a higher number of incidents, these reporting requirements being driven by POSH legislation¹⁷ and CDC GBVH interventions.

CDC will continue building our investees' capacity to identify and address GBVH incidents by applying a victim-centred approach and tracking data over time so that it can further enhance its training and capacity building programme for 2021.

Reporting of Cases

Between September 2020 and September 2021, CDC has become aware of 29 safeguarding incidents from our investees (which involves 45 survivors). From these, none were categorised as severe impact and significant safeguarding incidents; two were categorised as high impact; and the remaining incidents were categorised as

¹⁷ Specifically the Prevention of Sexual Harassment at the Workplace (POSH) Act, which requires some of CDC's Indian Investees to implement protection against sexual harassment of women at work.

low-medium impact. Within this reporting period, CDC has also been made aware of 75 low to medium incidents reported to have occurred on or near a hydropower project currently under construction in Cameroon. Most of these incidents relate to inter-community GBVH (and not as a result of the project itself).

CDC staff have been involved in the investigation and/or review of all incidents and will continue to work with the relevant investees to enhance safeguarding capacity, governance and reporting until the incidents are resolved to CDC's satisfaction and in line with CDC's safeguarding incident management procedure and significant risk event process.

Next Steps

CDC's focus for the forthcoming reporting period will primarily focus on investees' training and capacity building to better equip them on how to proactively prevent safeguarding incidents, as well as respond to incidents when they do occur, in line with good practice and CDC safeguarding incident procedure.

Evidence of increased GBVH as a result of COVID-19 continues to grow. COVID-19 poses numerous challenges, as well as opportunities to learn and improve. CDC is commissioning research to understand the impact of COVID-19 on GBVH risks in geographies where CDC invest so that it can further enhance responses and incident management and inform its training and capacity building.

CDC will also review incident specific challenges (i.e. sectors that generate higher risk, circumstances that generate higher incident reporting, and CDC's response) to assess common challenges and lessons learnt to inform future processes. CDC will continue tracking data over time and monitoring trends to inform our GBVH prevention practices and more effectively support our investees.

CDC will integrate its internal audit review recommendations and conclusions which include further enhancements to CDC's GBVH reporting, escalation and accountability mechanism.

CDC will also continue to engage with other DFI peers in sharing lessons learned in managing incidents and to promote GBVH as a key issue.

8. GAVI and Global Fund

Introduction

Gavi, the Vaccine Alliance and the Global Fund to Fight Aids, Tuberculosis and Malaria (Global Fund) are Geneva-based financing agencies that receive funding from public and private sources. They are significant donors to health programmes in developing countries. In 2018, the two institutions signed up to [joint commitments](#) to prevent and respond to sexual exploitation and abuse, and sexual harassment (SEAH) in their own and their partners' operations.

Progress

1. Improved internal capability of staff.

Global Fund: 2021 has seen significant progress in the Global Fund's approach to protection from SEAH (PSEAH). The Global Fund issued updated Codes of Conduct for staff, fund recipients, suppliers, Country Coordinating Mechanisms (CCMs) and governance officials. These updated Codes of Conduct set out clear prohibitions and affirmative expectations regarding various human rights abuses, including sexual exploitation and abuse, sexual harassment, abuse of power, and child protection. In July 2021, the Global Fund launched the Protection from Sexual Exploitation, Abuse, and Harassment Coordination Unit ("PCU") within the Ethics Office. The remit of the PCU is to develop, as a matter of urgency, a structure, strategy, and annual implementation plan to achieve measurable improvement in the Global Fund's approach to PSEAH. Through stakeholder coordination and engagement, the PCU will lead the organisation's overall approach to PSEAH, oversee implementation, and ensure that a victim/survivor-centred, trauma-informed, holistic approach is embedded in the work

of prevention, detection, response, and partnership.

Gavi added a provision to the standard terms and conditions applicable to contractor and consultant contracts that prohibits them and their employees, if any, from engaging in Sexual Exploitation and Abuse. The new provision goes beyond barring abusive conduct and affirmatively requires contractors to "promote and create a culture that prevents sexual exploitation and sexual abuse."

The full provision is: "Contractors shall not engage in sexual exploitation and abuse. This includes sexual activity with persons under the age of 18, regardless of majority or the age of consent locally, and the exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. Contractors must promote and create a culture that prevents sexual exploitation and sexual abuse." (Consultant/ Contractor Agreements, Annex 3—Code of Conduct, Clause 1.8.). Noting the new approaches and Gavi's key role in COVID-19 vaccine roll-out via COVAX (mobilising resources, contracting with countries, companies and expansion in partnerships, particularly through the Humanitarian Buffer), an additional layer of due diligence, scrutiny and contractual emphasis to ensure the prevention of SEAH has been put in place.

Gavi has also continued to build on its strong internal cultural platform through revising the disciplinary procedures, requiring new staff to follow e-modules on expected behaviours, conducting background checks on new hires into senior positions, and through the creation of a new Diversity and Inclusion committee to provide a more holistic approach to strengthening the Gavi culture. In 2020, a 3rd

annual audit was successfully completed to maintain Gavi's certification as an equal salary employer: having already had full gender balance at its Senior Management Team, in 2021 it achieved the same for the full Gavi leadership team. Lastly, Gavi is currently reviewing and updating its Respectful Workplace policy and will roll out further training when the policy is updated towards the end of 2021.

2. **Development of new policies at the Global Fund, aligned with safeguarding best practice.**

As an initial step, the Protection from Sexual Exploitation, Abuse, and Harassment Coordination Unit PCU developed *The Global Fund's Operational Framework on the Protection from Sexual Exploitation and Abuse, Sexual Harassment, and Related Abuse of Power*. Two principles underpin the Global Fund's approach to PSEAH: (1) a victim/survivor-centred approach; and (2) international coordination.

Consistent with international best practices, the Global Fund has adopted the following four categories to frame its approach to PSEAH:

- » Policy, leadership and management
- » Prevention
- » Reporting and complaints
- » Response, accountability and transparency

Through the lens of this four-tiered approach, the Framework documents the infrastructure currently in place, the roles and accountabilities, and the overarching principles that will guide the Global Fund in the near and long-term work of operationalization and achieving maturity. The Framework is a "living document," intended to be independently reviewed by subject matter experts and representatives from community victim/survivor networks and updated at regular intervals. The Framework is accompanied by an Annual Implementation

Plan (AIP) that outlines the activities to be undertaken, matured, and embedded each year. The AIP will be the key to the iterative development, evolution, and eventual embedding of PSEAH practices into the Global Fund's work.

In June 2021 the Global Fund published its *Child Protection Framework*. This Framework describes the Global Fund's approach to child protection as set out in relevant policies, rules and procedures. It describes responsibilities, requirements, reporting channels, how child protection concerns are investigated, disciplinary measures and administrative sanctions, and how whistle-blowers are protected.

3. **Strengthening of PSEAH guidelines for programme delivery in Gavi.** On the country programmes side, building on the experience of immunisation programmes in other emergency settings, with the strengthening of the demand for policies to address Gender-Based Violence (GBV) and gender-related barriers to accessing COVID-19 vaccines, the communities and gender team has produced an updated document on safeguarding, SEA and GBV considerations in the delivery of COVID-19 vaccines. The Programme Funding Guidelines are being reviewed to assess if a requirement for implementing countries to design and implement a prevention of SEA plan for immunisation campaigns and programmes should be included in the programme design. The review of Programme Funding Guidelines will include assessing the role of Gavi's Independent Review Committee (IRC), in the review of country programme proposals, if plans for safeguarding against SEA are a future requirement of programme design.

Challenges and Lessons

1. **Internal accountability.** The diffuse nature of Gavi's approach to tackling SEA—legal, HR and culture, programmatic—has raised

the challenge of internal accountability which is being addressed through Gavi's risk committee. The Global Fund has been "learning by doing." In March 2021, the Global Fund's Office of the Inspector General (OIG) published its first-ever investigation report concerning sexual exploitation and abuse within a Global Fund grant. As a result of the work in that case, the OIG exposed some of the key areas in which the Global Fund still needs to grow, most immediately in the streamlining of accountabilities, identification of risk, support services delivery mapping, capacity building, and preventive intervention.

2. **Disclosure and transparency: The Global Fund's Office of the Inspector General (OIG).** The Global Fund aims to strike the right balance between transparency in reporting and the need to protect the confidentiality of victims and witnesses. As such, OIG will factor in the additional sensitivities associated with an SEA case, while objectively and succinctly reporting verified factual findings and the assessment of such findings. Additionally, the OIG has also developed a standardised and collaborative protocol for donor reporting throughout the duration of a case.
3. **Safeguarding by Gavi during the COVID-19 pandemic.** The focus on SEAH in Gavi and its Alliance's programming has continued despite the lack of travel and reduced ability for country missions. The focus has been on remote management of all risks including SEAH founded on strong principles, updated programming guidelines, and changing risks in the pandemic context especially with the roll out of the COVID-19 vaccine programme. Building an internal and external culture of zero tolerance and focus on prevention of SEAH has been more challenging in this context, given also the tremendous surge in resourcing and activity. However the strong emphasis that Gavi's Alliance places on SEAH has meant that

we have continued to build on and improve our programming, internal and contractual approaches to combat SEAH.

Case Study

This year, the Global Fund OIG published its first-ever SEA investigation, *Misconduct affecting Global Fund grants*. OIG found that executives at a Global Fund implementer and Sub-sub-recipient of grant funds abused their positions of power and fostered a culture of sexual and financial exploitation, demanding sex acts and money from people living with HIV as a condition of access to benefits.

OIG undertook a victim-centred, trauma-informed investigation. Consistent with a "do no harm" mandate, OIG obtained the informed consent of all involved and explained OIG's commitment to anonymity and victim support. From the outset, the Global Fund worked with the local police and the Principal Recipient of grant funds to connect those impacted with appropriately tailored support systems, including gender-based violence counselling and specific support to address safeguarding. In January 2020, the Global Fund re-allocated grant resources to provide ongoing supervision, legal counsel, and capacity building for all program participants at risk of exploitation and abuse. Simultaneously, funding for the subject implementer was suspended during the investigation, and all subject executives were ultimately replaced by the implementer.

Reporting of Cases

Global Fund. We are seeing a general increase in SEAH complaints compared with last year, however the overall number remains very low. The Global Fund notifies its Audit and Finance and Ethics and Governance Committees at appropriate

points about substantiated instances of SEA. Such reports will happen regularly as needed.

The Global Fund clarified its complaints reporting mechanisms in 2021, with significant effort devoted to increasing staff and implementer awareness on what, when and how to report allegations. Investigative mandates and accountabilities are currently under assessment for streamlining, and the organisation has committed to a victim/survivor-centred, trauma-informed approach to all investigations, including the use of a multi-disciplinary team (MDT) approach in OIG investigations of allegations of SEA affecting beneficiaries. In recognition of the extreme vulnerabilities and sensitivities that may be present in these cases, the OIG relies on an individually-tailored team of professionals from multiple disciplines and backgrounds who work together to support a victim/survivor on a case by case basis. A PSEAH Specialist who facilitates victim support and advocacy now sits permanently in the Global Fund's PCU and takes part in each MDT. Likewise, inside the Global Fund, ongoing support for any victim/survivors of SEAH and related abuse of power is available to staff via the Human Resources Department, Staff Counsellor, Ombuds, and Staff Council.

As per the PSEAH Framework, the Global Fund recognises the paramount importance of not causing further harm to any victim/survivor and publishes the general categories of available support services for victim/survivors of SEAH: safety and protection, medical care, psychosocial support, education, livelihood support and basic material assistance, and legal services.

Gavi: No cases were reported through any of the possible channels in 2021.

Next steps

The Global Fund will focus on the four tiers of its PSEAH approach: (1) policy, leadership and management; (2) prevention; (3) reporting and complaints; and (4) response, accountability and transparency. The Fund will emphasize PSEAH

ownership and accountability across all four tiers and throughout the organisation and specifically work to identify and address barriers to reporting and design preventive programmatic interventions. The Global Fund's PCU will coordinate the organisation's PSEAH approach through its Steering Committee, Case Review Panel, and five working groups dedicated to the following areas:

- » framework, codes of conduct & policies
- » training and awareness
- » victim/survivor support and case management
- » in-country PSEAH risk assessment and capacity-building
- » preventive program design, integration, and oversight

The OIG will simultaneously run training programs for its staff to build the in-house capacity to handle these cases. Additionally, the OIG will launch a targeted campaign to raise awareness of SEAH and to ensure that reporting channels are known and accessible to our implementers.

Gavi will continue to evolve our policies and training such that Gavi staff are empowered and trained to be both vigilant and assertive in reporting and addressing concerns of SEAH in the internal setting as well as in programmatic settings.

We will strengthen our internal accountability and responsibility for SEAH in the different areas outlined above to ensure the focus on SEAH is maintained and where necessary strengthened.

We will work with others with relevant expertise, including the Global Fund, to make continuous improvements to policies, programmes and prevention through whatever means are available: networks and partners; by building a diverse and inclusive internal culture; through contractual obligations; and through continuous strengthening of our programming.

9. Red Cross Red Crescent

Introduction

The Red Cross Red Crescent Movement (RCRC) is represented on the CSSG by the British Red Cross (BRC). In 2019, BRC and DFID (now FCDO) published a pledge to prevent and respond to SEAH in humanitarian action at the 33rd International Conference of the RCRC in Geneva, reiterating the Movement's long-standing commitment to preventing and responding to sexual exploitation and abuse¹⁸. As a CSSG member, BRC has worked together with the International Federation of Red Cross and Red Crescent Societies (IFRC) to provide an update on progress related to its pledge.

Progress

1. **Systems and culture for PSEA.** The IFRC Secretariat established a PSEA solutions group in 2020. Headed by the Director for the Office of the Secretary General, it has cross-IFRC experience including representatives from the Office of Internal Audit and Investigations (OIAI), legal, HR, Protection Gender and Inclusion (PGI) and National Society Development (NSD). It has four workstreams: HR and resourcing; information sharing; training; and mainstreaming PSEAH in policies and operations/programmes. The group has developed a new safeguarding self-assessment framework and tool which is aligned with the Inter-agency Standing Committee's Minimum Operating Standards

for PSEA¹⁹, IFRC's risk management framework and sector-wide best practice.

2. **IFRC integrity line and case management system.** The IFRC launched a new digital whistleblowing hotline—Integrity Line. This is a secure and confidential service, accessible online, via email and phone, allowing anyone to report any alleged misconduct or integrity incident in connection with IFRC Operations. It includes a case management system which enables case managers to communicate with the reporter, document steps taken to address the incident and offer real-time reporting. The case management system can be adapted for use by any National Society. 16 National Societies are currently working with IFRC to review, test, adapt and implement Integrity Line.

3. **Capacity strengthening with partner National Societies.** The IFRC's safeguarding approach recognises PSEA and Child Safeguarding as two significant areas of focus and investment for the IFRC network. A four-year Global Safeguarding Action Plan has been developed to help support fundraising and collaboration for the roll-out of PSEA and Child Safeguarding in the IFRC network.

In collaboration with a growing core group of National Societies²⁰, IFRC provides technical support to National Societies to support the development of their PSEA policies and systems. To date, the IFRC, ICRC and 17 National Societies²¹ have a PSEA policy which

18 The PSEAH Pledge is complimented by the [Safe and Inclusive Humanitarian Environment Pledge](#), which was also presented at the 33rd International Conference.

19 Fulfilling the requirements of any funding from the United Nations.

20 Australian, British, Canadian, Finnish, French and Icelandic, among others.

21 Australia, Bangladesh, Burundi, Finland, Ivory Coast, Kenya, Liberia, Malawi, Mozambique, Nigeria, Panama, South Sudan, Tanzania, Uganda, UK, Zambia, Zimbabwe.

meets the IFRC standard. This represents an increase of 13 National Societies during this reporting period. A further 12 National Societies²² have a draft PSEA policy in progress, with 17 National Societies²³ receiving technical support from IFRC in this reporting period.

The BRC has led a PSEA pilot with the Nigeria and Namibia Red Cross Societies to trial approaches for implementing practical measures for strengthening PSEA in programmes and operations, with reference to Minimum Operating Standards for PSEA (see Case Study below).

Challenges and Lessons

1. **Clear guidance and resources are needed to ensure a survivor-centred approach.** It remains a challenge for the whole aid sector and governments to find the right balance between investigating and disciplining perpetrators of SEA on the one side, and resourcing community-based complaint mechanisms and safe and accessible support services for victims/survivors on the other. Progress in protecting people from SEA requires resourced and watertight standard operating procedures for a survivor-centred approach. IFRC and the RCRC Movement cooperate closely with inter-agency networks that address gender-based violence and SEA through local experts. One challenge is how to make these networks' expertise known to all managers, investigators, security staff and others involved in receiving or handling a complaint. It is important to consider urgent medical and other needs for survivors, ensure sensitive information is shared only on a need-to-know basis, and engage the PSEA focal point (or appropriate staff member) to

ensure appropriate follow-up action to prevent further harm.

2. **Transparency and accountability by leadership is needed for genuine progress.** In order to reduce sexual exploitation and abuse by humanitarian workers, leaders across the sector must be willing to make minimum operating standards for PSEA a practical reality in the international programmes implemented and/or funded by their organisation. One challenge is how to pool the limited resources available for strengthening PSEA through a well-coordinated network. Another challenge is ensuring consistent indicators, monitoring, reporting and performance management to ensure that PSEA is consistently recognised as an organisational priority.

22 Afghanistan, Bahamas, Cameroon, Denmark, Libya, Namibia, Norway, Philippines, Serbia, Somalia, Sweden, Ukraine.

23 Belize, CAR, Chile, Colombia, DRC, Ecuador, Ethiopia, Honduras, Greece, Iceland, Laos, Mali, Mauritania, Niger, Paraguay, Venezuela, Vincent and the Grenadines.

Case Study

With support from the leadership of the Nigeria and Namibia Red Cross Societies, the BRC and IFRC have worked together with these partner organisations to support the design, implementation and evaluation of several PSEA pilots. The PSEA pilots were designed to establish the foundational structures and systems required to enable implementation of Minimum Standards for PSEA in humanitarian programmes and operations. The pilots have informed plans to upscale PSEA in the IFRC network, as reflected in the new Global Safeguarding Action Plan, and demonstrated the effectiveness of several approaches trialled:

- » developing a network of PSEA focal points at HQ and Branch level is a useful structure for supporting prevention and response to SEA, but these roles need to be adequately funded and resourced;
- » a PSEA Officer role at regional level is a valuable asset for facilitating in-country collaborations and peer learning among National Societies in the region;
- » there is a need for clarity about what is realistic to achieve within the scope and timeframe of a project, and what needs to be part of an organisational development programme;
- » a joined-up approach to PSEA, Protection, Gender and Inclusion (PGI) and Community Engagement and Accountability (CEA) is helpful to ensure comprehensive assessment of risks to community members and development of complaints mechanisms, referral pathways and IEC materials.

Reporting of Cases

The Red Cross Red Crescent Movement recognises the importance of transparency and accountability in order to encourage reporting of SEA concerns, monitor adequacy of systems, and provide assurance to personnel, partners and donors.

Since January 2021²⁴, the IFRC has received 26 reports of SEA concerns, of which:

- » 7 allegations are under preliminary assessment;
- » 14 allegations are under investigation;
- » 4 investigations were closed, of which 2 substantiated, 2 not substantiated;
- » 1 was referred to the National Society.

Since October 2020, BRC International has received 3 reports of SEA concerns. All 3 were referred to the relevant National Societies, the IFRC or ICRC, with the understanding that reports would be shared with the BRC (if the concerns involved National Society personnel with relation to BRC funded programmes).

In addition, BRC International has received 4 reports of sexual harassment (SH) of which 3 related to National Societies:

- » 3 were referred to the relevant National Society;
- » 1 was dismissed.

Compared to the last report, there has been a reduction in the number of reports. This is due to the report for this period including concerns of SEA and SH received by BRC International, whereas the last report included all safeguarding concerns across both BRC's international and domestic programmes and services²⁵. It should also be noted that cases referred to the IFRC

24 This report presents case data between January 2021 to date, as IFRC changed the statistical unit in 2021 (i.e. 1 victim/1 perpetrator = 1 case) and implemented the Integrity Line.

25 For the purposes of comparison, a total of 1,537 safeguarding concerns was received during this reporting period (1,528 in the previous reporting period).

by the BRC (and vice versa) will appear in the reporting data for both organisations.

Next steps

Our Global Safeguarding Action Plan (2022-2025) identifies PSEA and Child Safeguarding as two priority areas of focus for the IFRC network. The Action Plan includes indicators and targets for joint advocacy, institutional and operational capacity strengthening across the IFRC network, with objectives to:

- » strengthen mechanisms for coordinating safeguarding within the IFRC network and humanitarian sector;
- » work with National Society partners to conduct institutional safeguarding assessments;
- » work with National Society partners to strengthen their institutional structures, systems and culture for safeguarding;
- » support and facilitate IFRC and National Society programmes, services and emergency operations to mainstream and integrate safeguarding; and
- » contribute to safeguarding related learning in the IFRC network and the wider sector.

