

Summary of Findings from KCS Central Assurance Assessments of DFID Partners

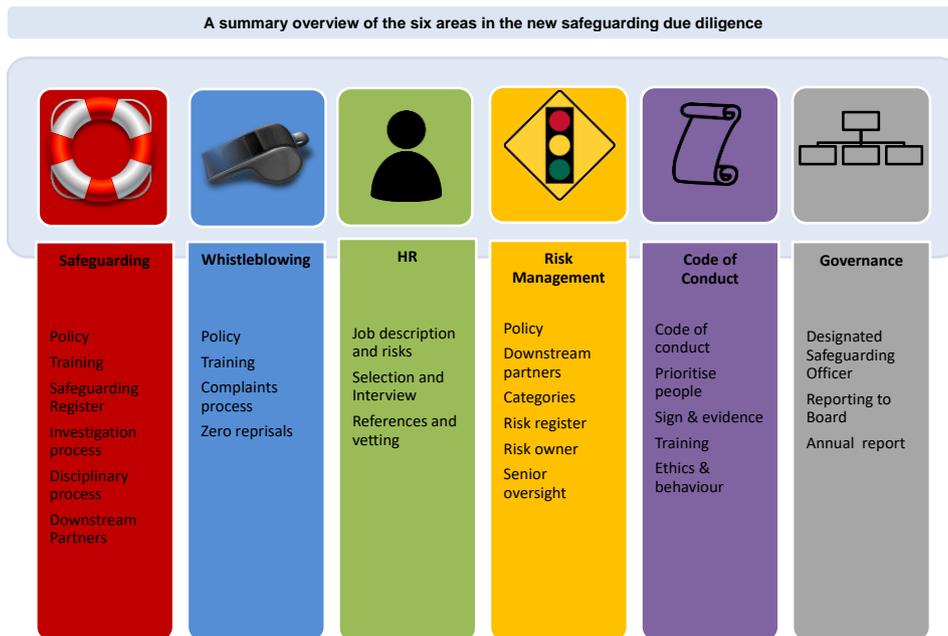
Introduction

At the Safeguarding Summit on 5 March 2018, the then Secretary of State announced that DFID would introduce new, enhanced and specific safeguarding standards for UK Civil Society Organisations (CSOs). Designed to minimise the risk of sexual exploitation, abuse and sexual harassment (SEAH) in the aid sector, these standards were added to DFID’s Due Diligence process. The enhanced standards cover six areas: safeguarding, human resources, whistleblowing, risk management, codes of conduct, and governance.

In mid-2018 DFID commissioned Keeping Children Safe to carry out safeguarding-specific central assurance assessments (CAAs) on 31 CSOs who between them account for over £2 billion of DFID/UK Aid funding and deliver DFID-funded programmes in more than 30 countries across Africa, Asia and the Middle East.

The CAAs focused on the central corporate level of organisations and included a thorough review of SEAH policies, procedures, documentary evidence, interviews with key staff, focus group discussions and visits to head offices. Keeping Children Safe assessed each CSO against the six pillars of DFID’s Enhanced Safeguarding Due Diligence, described in more detail in Figure 1. Results against each of the areas were graded as either satisfactory or not satisfactory and accompanied by recommendations from KCS on how each organisation should strengthen their safeguarding measures in accordance with the standards.

Figure 1: Overview of the six areas of DFID’s Enhanced Safeguarding Due Diligence



Status of the assessments

The first batch of CAAS on 16 organisations¹ was completed in early 2019. A second batch of CAAs on a further 15 partners² was completed in March 2020. Organisations in the second batch were assessed against the International Child Safeguarding Standards as well as DFID's Enhanced Safeguarding Due Diligence standards.

On completion of the reports, Keeping Children Safe shared the CAAs with the CSOs. DFID wrote to the first batch of organisations with key recommendations in early 2019 and supported them when required to implement the recommended improvements. Letters to the second batch of CSOs will be accompanied by an implementation tracker, developed by Keeping Children Safe to highlight priority actions and monitor progress.

The tracker will aid future conversations with DFID institutional leads or programme teams on progress against CAA recommendations. CSOs will be asked to formally respond to the recommendations, and their responses will be made available on DFID's new Due Diligence Hub for consideration by programme teams when carrying out due diligence assessments.

It is important to note that these CAAs represent a snapshot in time. The assessments did not consider organisations' historical approaches to safeguarding against SEAH. In addition, much has been done by organisations to improve and address gaps since the CAAs were conducted, particularly those in the first batch, which were completed more than a year ago.

Summary of findings

Keeping Children Safe provided a summary report for each batch of CAAs, as well as an overall impact statement. Findings are summarised below. More detailed summaries of strengths and weaknesses in each of the six pillars are provided in the next sections.

- Across the 31 assessments, KCS provided over 1,000 recommendations for improvement.
- The assessments indicated that organisational culture, driven by leaders, is the most important factor in changing perceptions of risk and gaining buy-in across business functions for strengthening safeguarding measures. Second to this was the need for clear, comprehensive and accessible policies and guidance.
- Assessing the second batch of organisations against the International Child Safeguarding Standards highlighted gaps in some approaches to safeguarding, particularly in tailoring safeguarding measures to different at-risk groups and specifically to children's needs. It was found that all organisations could do more to

¹ Oxfam, BRAC, British Red Cross, CARE International UK, Christian Aid, Concern Worldwide, International Medical Corps, International Rescue Committee UK, Save the Children UK, UNICEF UK, CARE, VSO, Marie Stopes International, Mercy Corps Europe, Sightsavers, and World Vision UK.

² Action Against Hunger, BBC Media Action, Camfed, Disasters Emergency Committee, Goal, Halo Trust, Help Age International UK, Help Age UK, Humanity Inclusion, Malaria Consortium, Norwegian Refugee Council, Plan International UK, Population Services International, UCEP Bangladesh, and WaterAid.

adapt their safeguarding measures to children, involve them in raising awareness and adapt reporting mechanisms to make them accessible to children.

- Organisations assessed in the second batch were much smaller in scale and staff footprint than those of the first batch, with more functions being grouped under individual roles and more devolved implementation of safeguarding practices in country, e.g. through partners or members. They had more time than the first batch to address gaps and implement changes to comply with DFID's safeguarding standards. However, KCS found that many had been slow to implement changes to strengthen their safeguarding measures.
- The decision to only include head office locations in the assessments, not country or field offices, was found to be a limitation, as it is in programme locations that implementation of policies and processes would be most evident.
- The top five priority areas in which the CSOs assessed by Keeping Children Safe have committed to make improvements are:
 1. Support to victims and survivors, to improve trust and prevent further harm;
 2. Developing complaints mechanisms locally in collaboration with communities and children, to ensure they widely accessible and effective;
 3. Incorporating safeguarding into partnership processes, including assessment; capacity building, policy, reporting and governance;
 4. Including safeguarding risk assessments in all programmes; and
 5. Designating safeguarding focal points at various levels in the organisation.

Findings in each of the six due diligence pillars

Safeguarding

Safeguarding shapes an organisation's approach, practice and culture to ensuring a safe environment for everyone it engages with. This standard looks at safeguarding policies and how they are implemented, as well as staff responsibilities, training, reporting and complaints mechanisms, recording and handling of cases, and support to victims and survivors.

The Keeping Children Safe assessments found that:

- Organisations often seem to focus more on investigation, compliance and reporting of safeguarding concerns and comparatively less on prevention.
- Where organisations have hired a specific Head of Safeguarding, they always performed better across the standards.
- Some CSOs have excellent community engagement tools but this not the norm – all need to do more to involve communities in developing safeguarding measures.
- Organisations often have a stated aim to focus on victims and survivors, but converting that into concrete action through their processes is harder.

- Few organisations conduct thorough mapping exercises of legal or safeguarding contexts in their countries of operation.
- Organisations need to be more specific about how they support partners in capacity building, training, due diligence, technical support and reporting. As a minimum, most organisations do stipulate in contracts that partners adhere to their safeguarding policies until they have developed and implemented a policy of their own.

As a result of the recommendations³ in the CAAs:

- ✓ 29 organisations are strengthening procedures to support victims and survivors, to improve trust, integrity, confidentiality and prevent further harm.
- ✓ 23 are working to map safeguarding contexts, legal issues and support services in all countries of operation to ensure safeguarding measures are adapted accordingly.
- ✓ 21 are ensuring their complaints mechanisms are developed and adapted locally in collaboration with communities and children to ensure procedures are accessible and effective across different ages, cultures, genders and languages.
- ✓ 20 are now working to incorporate safeguarding in partnership processes including assessment, capacity building, policy, reporting and governance.
- ✓ 18 are providing all staff and managers with specific safeguarding responsibilities to ensure safeguarding children and people at risk of harm is everyone's responsibility.
- ✓ 17 are creating new or strengthening existing safeguarding policies following KCS recommendations for improvement, particularly where certain groups or key information have been omitted.
- ✓ 15 more now require trustees and board members to carry out safeguarding training to ensure safeguarding culture stems from the top of the organisations.

Whistleblowing

Whistleblowing allows concerns to be raised and resolved at the appropriate level. This standard is concerned with an organisation's whistleblowing policy and processes. It includes the requirement to have a clear process for dealing with concerns, which is widely understood and accessible to all staff, as well as a handling framework with identified owners of each step. The policy (which may not be referred to as whistleblowing but might be a complaints and/or concerns policy) should be explicit that there can be no reprisals for the whistleblower.

The Keeping Children Safe assessments found that:

- Whistleblowing policies and staff understanding is stronger where examples of concerns and how to report them are included.
- External support for whistleblowers is rarely signposted by organisations – third party or independent advice is rarely identified and there is a need to adapt reporting

³ The numbers in these sections relate to the number of organisations that received specific recommendations from Keeping Children Safe and committed to implement them. All other organisations were already meeting expectations in these areas.

mechanisms to local contexts to ensure they are appropriate and accessible for all stakeholders.

- Whistleblowing policies need to be made available to all, including partners and beneficiaries as well as staff.
- There is a need to find a middle ground in terms of detail of whistleblowing policies, providing key information to whistleblowers while not overwhelming them with information. Some organisations assessed through this process had policies that were either too brief or long and complex.

As a result of the recommendations in the CAAs:

- ✓ 12 more organisations are providing contact information for prescribed third party organisations for raising of concerns externally and independently.
- ✓ Two more CSOs are making it obligatory for staff to raise safeguarding concerns.

HR Safeguarding

HR focuses on recruitment and vetting policies and processes, including job adverts, interviews, references and background checks. This standard requires that organisations are aware of, and take into account, the level of safeguarding risk in each role. For instance, if a role involves working directly with at-risk groups, such as children or vulnerable adults, specific interview questions should be included to draw out an applicant's attitudes and awareness in relation to protection of those groups.

The Keeping Children Safe assessments found that:

- Many organisations are struggling to conduct background checks and references in every country they operate in due to local systems, funding, and other limitations.
- The level of safeguarding risk in roles is not being considered as often as it could and management positions are generally not being made accountable for assessing their teams' safeguarding risks.
- Safeguarding questions are appearing in interviews – good practice includes making available banks of potential interview questions.
- Interviewers should have relevant experience of safeguarding above mandatory training, in order for them to be well-placed to assess candidates' responses to behavioural and situational safeguarding questions.
- It is important for job adverts to include zero-tolerance statements and commitments to safeguarding.

As a result of the recommendations in the CAAs:

- ✓ 19 more organisations are developing value and behaviour-based safeguarding questions in staff interviews.
- ✓ 13 more are incorporating safeguarding statements in job advertisements to act as the first line of defence against perpetrators.

Risk Management

This standard considers the risk management framework, which sets out an organisation's risk policy, approach to identifying and mitigating safeguarding risks and risk appetite. Risk management at project level should include a risk register with clear mitigating actions and identifiable owners. Risks should be reviewed regularly. If the organisation is working with vulnerable people, safeguarding should be a risk category on the organisation's register or framework. There should also be clarity for escalation of safeguarding risks. The expectations of risk management for downstream partners should be made explicit in the risk policy.

The Keeping Children Safe assessments found that:

- Safeguarding is generally not being considered as a standalone risk category. Where it is being considered in this way, organisations perform better across the standards.
- Many organisations have good structures and management processes to track concerns but could do more to mitigate safeguarding risks.
- Safeguarding risks and harm to children through staff, programmes and operations is still not being identified systematically in risk assessments. Where safeguarding risk is being assessed, it is usually in quite general terms and would benefit from more specifics about the local, national and regional contexts.
- Organisations are understandably concerned about reputational risks, but many could do more to adopt a comprehensive approach to assessing safeguarding risk from programme or project level up, and could focus more on risk of harm and abuse to at-risk groups, children and staff and the impact on those individuals.
- Based on these assessments, Keeping Children Safe emphasised the role of the safeguarding focal point to advise and develop awareness on safeguarding risk, and develop mitigations.

As a result of the recommendations in the CAAs:

- ✓ 13 more organisations are working to include safeguarding risk assessment in all programmes to address potential risk of harm through their staff, programmes and operations.
- ✓ 13 more are developing and implementing new risk management policies which specifically include risk of harm to children and people at risk as organisational risks.
- ✓ 10 more are directing safeguarding risk to be addressed in all organisation risk assessments.
- ✓ Nine more are designating new safeguarding focal points at various levels throughout their organisations to act as points of contact, advisors, champions of safeguarding culture and to ensure safeguarding measures are correctly implemented.

Code of Conduct

The Code of Conduct describes the ethics and behaviours required of all parties related to an organisation, to ensure a robust safeguarding environment. It is designed to create a culture

of best practice that all partners should adhere to. This standard requires partners to have their own robust Code of Conduct which clarifies the values, principles and acceptable behaviours within the organisation, and which should influence and drive the organisation's culture. Organisations should ensure that their partners also have an appropriate Code of Conduct in place for their staff and associates.

The Keeping Children Safe assessments found that:

- Code of Conduct was an area of strength for most organisations, with almost all criteria being 'met' under this category and few or no follow-up recommendations.
- Recommendations that were made tended to be linked to ensuring downstream partners had a robust Code of Conduct in place, conducting staff training on the Code of Conduct and ensuring a uniform Code of Conduct was in place for staff and associates so that expected standards of behaviour are clear.
- Best practise is to include examples of misconduct and expected behaviours in the Code of Conduct.

As a result of the recommendations in the CAAs:

- ✓ Six more organisations are now developing universal codes of conduct for all staff.

Governance

This standard assesses the governance structure of an organisation, and how this creates, fosters and ensures safeguarding through controls and oversight. The organisational Board has ultimate responsibility for safeguarding and should always act independently, in the best interests of beneficiaries, staff and volunteers. This standard requires that organisations have a designated safeguarding officer at Board level who is engaged with the senior leadership teams and management of the organisation. Engagement on safeguarding should be evidenced by regular reporting directly to the senior leaders and Board, either through a standing agenda item in regular meetings or through risk register updates.

The Keeping Children Safe assessments found that:

- Organisations where the CEO is directly involved in safeguarding see better buy-in to safeguarding from all business functions.
- Organisations with a specific trustee responsible for safeguarding performed better in the assessments.
- Organisations are starting to advocate and prepare partners for safeguarding assessment, capacity and assurance.
- Many of the organisations assessed through this process were the UK office of global NGOs and often do not have the leverage required to influence their global organisations.
- There was no sector norm for which Board committee presides over safeguarding.
- Keeping Children Safe recommends that safeguarding should be a standing item on the agenda of Board meetings of those assessed through these CAAs until the organisation's implementation plan is completed.

As a result of the recommendations in the CAAs:

- ✓ 15 more organisations now require trustees and Board members to carry out safeguarding training in line with staff to ensure safeguarding culture stems from the top of the organisations.
- ✓ Seven more have included safeguarding data in mandatory monitoring and evaluation reports for key management forums.
- ✓ Five are designating their first Board member to lead on safeguarding oversight.

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