



HM Government

UK Strategy: Safeguarding Against Sexual Exploitation and Abuse and Sexual Harassment within the Aid Sector

September 2020

Foreword

This strategy on safeguarding against sexual exploitation and abuse and sexual harassment sets out the actions the UK is taking across all government departments which engage in delivering Official Development Assistance (ODA).

Sexual exploitation and abuse and sexual harassment in any organisation is completely unacceptable, particularly in a sector which aims to help some of the most vulnerable people in the world. ODA must be delivered in a way that does no harm. Sexual exploitation and abuse and sexual harassment undermines the aid sector as a whole and limits our ability to deliver positive change.

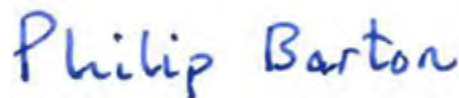
Trust in the international system and in the aid that is delivered through the sector is vital. Safeguarding against sexual exploitation and abuse and sexual harassment must be at the centre of everything we do to ensure that this trust is maintained and, where needed, rebuilt. The international system will not be able to achieve the Sustainable Development Goals without this.

Safeguarding against sexual exploitation and abuse and sexual harassment is a long-term challenge that the UK is committed to addressing. This strategy builds on considerable work to-date, in particular the work leading up to and following from the October 2018 London Safeguarding Summit. It lays out the challenge, the UK's vision, an evidence-based theory of change for the sector and, based on

the theory of change, how we seek to achieve transformational change across the aid sector, within ODA-spending departments and across the UK's ODA funding.

Progress has been made, but this is a long-term endeavour. We must ensure the failings of the past are not repeated. This strategy is part of our ongoing commitment to put victims, survivors and whistle-blowers first and drive real culture change across the sector in the years ahead.

Safeguarding against sexual exploitation and abuse and sexual harassment is everyone's responsibility. We will only achieve the change we want to see if we work together.



Sir Philip Barton, Permanent Under-Secretary, Foreign, Commonwealth and Development Office, in agreement with all other UK ODA spending departments (see list on final page)

September 2020

1. The Challenge

In 2018, the aid sector's failure over many years to prevent and respond to sexual exploitation and abuse and sexual harassment came into sharp relief. It had been too easy for aid workers to get away with sexual misconduct. Their actions had undermined trust in the whole sector. Cases of sexual exploitation and abuse and sexual harassment were mishandled or inadequately responded to.

The evidence is clear: the aid sector must **drive up standards** and **the time to act is now**. This is a collective responsibility for us all.

Sexual exploitation and abuse and sexual harassment is intrinsically sensitive and is therefore both under-reported and often undocumented. Under-reporting is also perpetuated where there is fear and lack of trust in reporting systems. Despite this, the timeline of allegations over the past 25 years shows a consistent problem that urgently needs to be tackled. The UK is committed, both as a global leader and member of the aid community, to ensure that we do just that.

There is currently no systematic data on the prevalence of sexual exploitation and abuse and sexual harassment across the sector. However, various studies show us the scale of the problem:

- » During the Syria Crisis 40% of women and girls have disclosed experiencing sexual exploitation and abuse as recipients of humanitarian aid (Whole of Syria GBV Area of Responsibility 2017). There is evidence that serious sex offenders who are known to the authorities in the UK seek out jobs abroad where they feel that they can abuse without detection. It is vital that the aid sector does all it can to deter and prevent offenders operating within the sector.
- » One in four women aid workers reported being sexually assaulted while on mission and one third of UN staff and contractors have experienced sexual harassment over a two-year period (Humanitarian Women's Network, 2016).
- » In the same survey of over 1000 humanitarian aid workers, the majority of respondents said they knew a colleague who had experienced

sexual violence in the course of their humanitarian work.

- » In addition, the survey supports wider evidence showing that capacity to respond to allegations and incidents has been inadequate and under resourced in the past. Safeguarding against sexual exploitation and abuse and sexual harassment right across the aid sector, amongst both beneficiaries and staff, is an immediate necessity.

The relationship between aid provider and recipient, as well as relationships between staff of different genders, ages, nationalities and identities, are often rooted in unequal power dynamics, particularly gender inequality. This can lead to increased vulnerability to sexual exploitation and abuse and sexual harassment if power is abused. Evidence shows that some contexts present heightened opportunities for perpetrators to commit sexual exploitation and abuse and sexual harassment, for example, within humanitarian settings or within health and education sectors. Persisting inequalities and power imbalances mean that certain groups of people, in certain circumstances, can be more vulnerable to sexual exploitation and abuse and sexual harassment being perpetrated against them. These include (but are not limited to) children, women and girls, people with disabilities, people made vulnerable by poverty, and sexual and gender minorities.

2. The UK's Vision for Safeguarding against Sexual Exploitation and Abuse and Sexual Harassment

The UK's vision is an aid sector free from sexual exploitation and abuse and sexual harassment. Delivering the Sustainable Development Goals for all will tackle the unequal power dynamics that persist and which enable sexual exploitation and abuse and sexual harassment to be perpetrated and tolerated.

Our long-term vision is accompanied by shorter-term aims of ensuring that both the aid sector as a whole and UK ODA spending departments are effectively safeguarding against sexual exploitation and abuse and sexual harassment wherever we work across the world, so that all those we (or our partners and suppliers) come into contact with are **safe** from harm and **empowered** to speak out wherever harm or risk of harm occurs.

To ensure this, the UK is committed to driving up standards across the aid sector, including within the UK government to ensure that we all take all reasonable steps to: **prevent** sexual exploitation

Safeguarding—Broadly means avoiding harm to people or the environment. In this Strategy we use it to mean safeguarding against sexual exploitation and abuse and sexual harassment, specifically.

Based on UN Definitions:

Sexual exploitation—Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual abuse—The actual or threatened physical intrusion of a sexual nature whether by force or under unequal or coercive conditions.

Sexual harassment—Unwelcome sexual advances (without touching). It includes requests for sexual favours, or other verbal or physical behaviour of a sexual nature, which may create a hostile or offensive environment.

and abuse and sexual harassment from occurring; **listen** to those who are affected; **respond** sensitively but robustly when harm or allegations of harm occur; and **learn** from every case.

The UK's Approach to Victims, Survivors and Whistle-blowers

At the heart of UK Official Development Assistance is a **respect for human rights** in which survivors and victims will be responded to with respect, confidentiality, safety and non-discrimination.

The UK will place the **rights, needs and wishes** of victims and survivors at the centre of reporting, investigative, complaints and response systems.

We will work to develop appropriate and sensitive **reporting, complaints and whistle-blowing mechanisms** across all our work and strengthen accountability and support services for survivors.

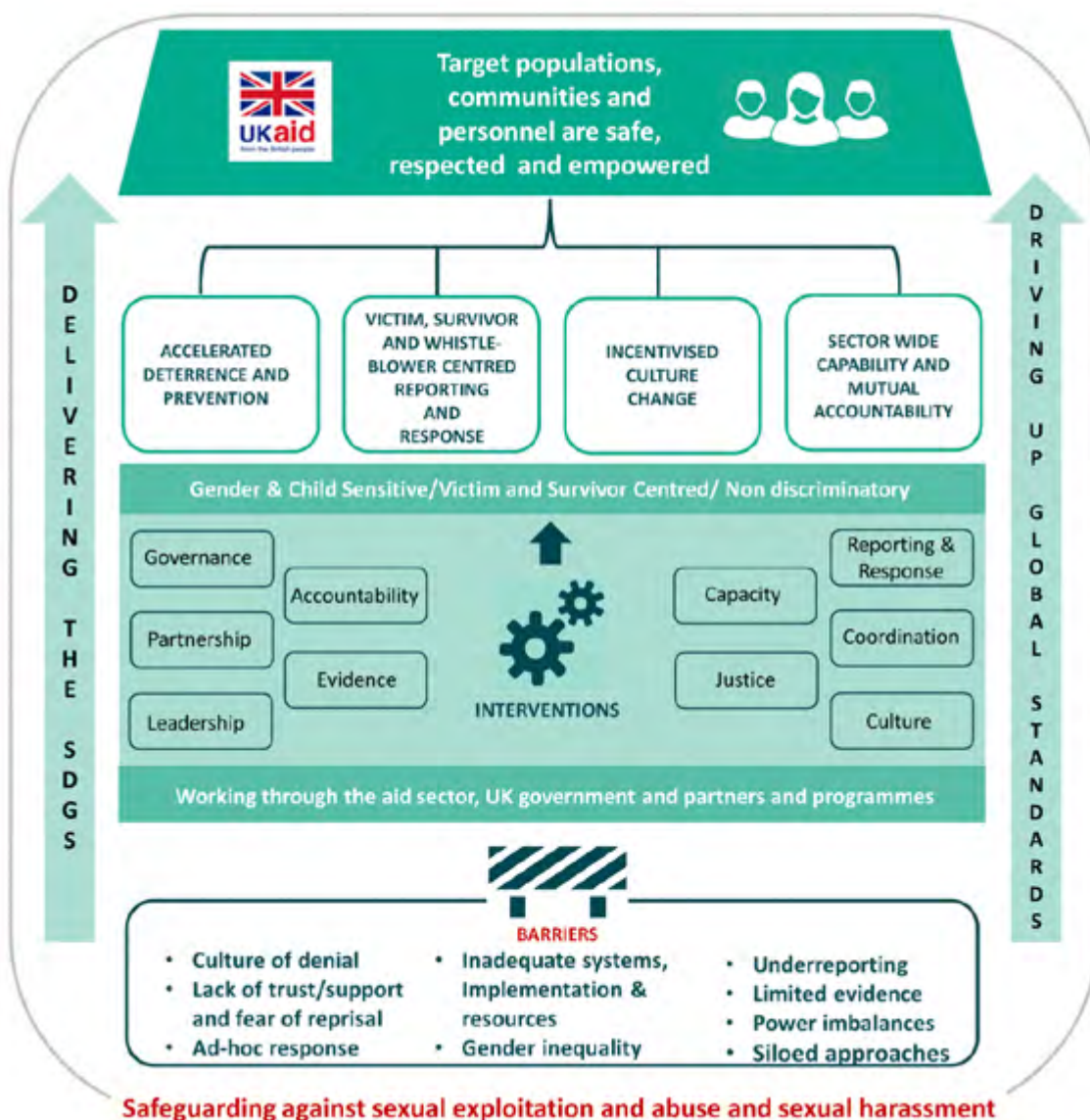
The UK will **listen** to victims, survivors and whistle-blowers or their representatives and learn from their experiences, adapting our approaches where required.

We will do all we can to prevent incidents of sexual exploitation and abuse and sexual harassment from happening, but where they do occur, we will take a **zero tolerance approach to ignoring, covering up or mishandling cases**.

We will apply these principles within our own organisations and across our programming.

3. A Sector-wide Theory of Change

The UK will work across a) the aid sector, b) within our own organisations and c) through our partners and programmes to support interventions that promote accelerated deterrence and prevention, victim- and survivor-centred reporting and response, incentivised culture change and sector-wide capability and mutual accountability. We will be guided by this sector-wide Theory of Change which is based on the available evidence on preventing and responding to sexual exploitation and abuse and sexual harassment. The Theory of Change (summary diagram below) underpins the UK's contributions and commitments outlined in this Strategy. Through this approach the UK and its partners will contribute to a sector-wide shift and positive change in safeguarding against sexual exploitation and abuse and sexual harassment that will help ensure that all people working within or affected by the aid sector are empowered, respected and safeguarded against SEAH.



4. UK Commitments and Contribution

The Sustainable Development Goals (SDGs) tackle many of the root causes of sexual exploitation and abuse and sexual harassment such as gender inequality, social exclusion, global power imbalances and violence. The UK has made various commitments that contribute to this long-term transformational change, for example, within the Strategic Vision for Gender Equality, the Preventing Sexual Violence in Conflict Initiative, the UK’s Women Peace and Security National Action Plan and on Disability Inclusion. The UK will also learn from work across other sectors, such as the Home Office’s work on online child exploitation.

This Strategy complements those on-going, wider efforts by focusing on the delivery of ODA by organisations operating within the aid sector, ensuring that aid delivery itself does no harm, respects and empowers beneficiaries and staff. It outlines the critical steps the UK will take to prevent and respond to sexual exploitation and abuse and sexual harassment, while simultaneously tackling the power imbalances and harmful social norms at the root of the problem through our wider commitments. We will act now, to rebuild trust in the aid sector and to ensure that we can deliver the longer-term change required in order to deliver the sustainable development goals. In October 2018, the UK hosted a Safeguarding Summit in London including participation from victim, survivor and whistle-blower representatives alongside fellow donors representing 90 per cent of global ODA, the UN, international financial institutions, International NGOs, private sector suppliers, research funders, CDC Group (UK’s development finance institution), and Gavi and the Global Fund. Considerable progress was made by agreeing wide ranging commitments to ensure that across the globe we collectively improve standards to ensure people are safe from harm, respected and empowered to speak-out, either as victims and survivors or whistle-blowers. We

committed to work together to deliver four long-term Strategic Shifts across the sector:



Ensure support for survivors, victims and whistle-blowers; enhance accountability and transparency; strengthen reporting; and tackle impunity



Incentivise cultural change through strong leadership, organisational accountability and better human resource processes



Adopt global standards and ensure they are met or exceeded;



Strengthen organisational capacity and capability across the international aid sector to meet these standards.

In July 2019, the UK alongside 29 other donors adopted the OECD Development Assistance Committee Recommendation on Ending Sexual Exploitation, Abuse, and Harassment in Development Co-operation and Humanitarian Assistance.

In delivering these commitments and guided by the theory of change, the UK has three key fields of influence through which we can contribute to transformation within the aid sector to prevent and respond to sexual exploitation and abuse and sexual harassment:

- A. Delivering sector-wide change;
- B. Delivering organisational change within UK aid-spending departments; and
- C. Delivering programmatic change across UK Aid programmes.

A) Delivering sector-wide change

The UK will catalyse change within the aid sector to help to ensure that i) perpetrators are detected and impunity is ended, ii) victims, survivors and whistle-blowers are supported iii) organisations are accountable and have the leadership, capacity and capability to drive change and iv) global standards are met consistently.

We will do this by:

- » **Providing global leadership** to deliver measurable progress right across the aid sector, both for the people we serve and those who work in the sector. The UK remains a committed member of the UN Secretary-General's Circle of Leadership and signatories to the Voluntary Compact. We will remain a leading voice on safeguarding against sexual exploitation and abuse and sexual harassment as a UN member state, within the OECD Development Assistance Committee and as a country in our own right.
- » **Raising this issue on the international stage with partners and stakeholders working across the sector.** The UK will engage with other donors, NGOs, the UN, International Financial Institutions, the UK's Development Finance Institution—CDC, Global Funds, the Red Cross Movement, private sector suppliers, and research funders, supporting delivery of commitments made and sharing lessons.
- » **Encouraging action and co-ordination at the UN to ensure that they are making progress against the UN Secretary-General's strategy.** We will continue to engage with the UN's Special Coordinator and Victim's Rights Advocate and encourage other member states to sign up to the Circle of Leadership and fulfil their commitments under the Voluntary Compact.

Examples of Implementation:

The UK is supporting three initiatives that work together to strengthen the employment cycle to end impunity for perpetrators and aid detection and prevention.

- » **Project Soteria** focuses on the criminal aspects of SEAH prevention and response management via more and better criminal records checks on staff. It is a joint initiative between FCDO, the International Criminal Police Organization INTERPOL and the UK's ACRO Criminal Records Office and is currently in a pilot year.
- » The **Misconduct Disclosure Scheme** provides a framework for organisations working in the aid sector to share information about a past employee's history of sexual misconduct at work. Signatories to the scheme are able to do this while respecting relevant legal and regulatory requirements. DFID and now FCDO has been actively encouraging organisations to sign up as well as looking at how to do this ourselves.
- » The **Aid Worker Registration Scheme** will provide employers with a trusted source of evidence about a potential employee's past work history, closing the loop on those who lie or omit information. We are hoping to pilot the scheme in 2020.

Together these initiatives will help employers to make better informed hiring decisions and prevent perpetrators moving around the aid sector undetected.

The UK has provided human resources to support development of the new **NATO Sexual Exploitation and Abuse policy**.

All UK ODA spending departments will adopt the enhanced **UN Pooled Funds Standard Administrative Agreement** that specifically strengthens requirements to safeguard against Sexual Exploitation and Abuse within UN pooled funds.

The UK's Prime Minister is a member of the **United Nation's Secretary General's Circle of Leadership**.

- » **Exploring and initiating projects to improve detection of perpetrators and sharing of information between organisations.** Perpetrators have been able to move around the sector too easily, undetected by employers. The UK will put measures in place to make it much more difficult for perpetrators to escape justice, make it easier for organisations to have confidence in those they recruit and allow communities to have confidence in the people sent to help them.
- » **Endorsing international minimum standards on safeguarding and supporting organisations working to verify adherence.** We have aligned with the [Inter-Agency Standing Committee \(IASC\) Minimum Operating Standards on PSEA](#) and [Core Humanitarian Standard](#) and will incentivise others to do the same. We will work with other donors to improve adherence to the IASC Standards.
- » **Strengthening grassroots organisations, including women’s rights organisations, institutions and local networks.** The UK will work with others to explore ways to support local organisations and institutions to give voice to activists, victims, survivors and whistle-blowers and provide them with access to the support services that they need. A range of local civil society organisations and institutions are uniquely placed to challenge social norms that permit sexual exploitation and abuse and sexual harassment and restrict people’s ability to speak out against it as well as to deliver services that enable access in ways that are appropriate to customs and norms.
- » **Professionalisation of safeguarding technical skills.** The UK will explore options to promote and build professional safeguarding expertise throughout the aid sector.

B) Delivering organisational change within UK Aid spending departments

The UK will improve the organisational culture in all UK Aid spending departments to ensure that staff know their responsibilities on safeguarding and feel safe to come forward and report concerns in the knowledge that their concerns will be responded to sensitively but robustly and with a victim and survivor-centred approach.

The UK government is clear that we must hold ourselves to at least the same high standards as we expect of our partners and that we must also take action to change the cultures and practices within our own departments that allows sexual exploitation and abuse and sexual harassment to occur.

We will do this by:

- » **Demonstrating clear leadership** at the very top and throughout our organisations. The evidence shows that this is crucial to create environments in which people feel empowered and supported to speak out against sexual exploitation and abuse and sexual harassment. In addition, (and as reported against the Public Sector Equality Duty), how we value and behave towards one another and our commitment to a diverse and inclusive workforce, including gender parity, is essential.
- » **Clear messaging throughout departments that highlights the importance and relevance of safeguarding for everyone in every role.** We will ensure that all departments have a clear staff code of conduct in place, making it explicit what behaviour is expected of staff. All departments will have a named safeguarding lead to set the tone from the top, including regular messaging out to staff about

UK ODA Staff responsibilities are founded on international standards on tackling SEAH as set out in the UN Secretary General's Bulletin '[Special Measures for Protection from Sexual Exploitation and Sexual Abuse](#)' (15 October 2003). The UK spells this out for staff as follows:

- » Sexual exploitation and abuse constitute acts of gross misconduct, and are therefore grounds for termination of employment
- » Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority, or age of consent, locally. Mistaken belief in the age of a child is not a defence
- » Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of aid/humanitarian assistance that is due to beneficiaries or resources or benefits that employees have power to give
- » Sexual relationships with beneficiaries are strongly discouraged, as well as other relationships which are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of our work
- » Employees who have concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, must report such concerns via established agency reporting mechanisms
- » Employees are obliged to create and maintain an environment that prevents sexual exploitation and abuse, and promote the implementation of the code of conduct. Managers at all levels have particular responsibilities to support and develop systems that maintain this environment.

the importance of the agenda and at least annual discussion at Board level.

- » **Building a diverse and inclusive workforce that champions the career development of women and works towards eliminating the gender-pay gap.** We will encourage the recruitment and career development of women and minority groups at the senior management level and throughout all departments to send a clear signal about the importance of gender balance and a diverse and inclusive workforce. Government departments will publish their gender pay gap data annually as required by the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017.
- » **Well-signposted reporting mechanisms for staff to raise concerns and robust procedures for handling them.** We will ensure that staff feel confident to report allegations of sexual exploitation and abuse and sexual harassment that have occurred to them or others in the knowledge that any complaint will be dealt with sensitively but robustly and with a victim and survivor-centred approach.
- » **Effective vetting checks and referencing procedures that are fit for purpose and regularly reviewed.** Departments will ensure that they have vetting and referencing policies in place to prevent perpetrators moving around the sector undetected.

Examples of Implementation:

- » **Staff codes of conduct** prohibit all staff from paying for sex, even where legal in a country in which staff are working.
- » All UK ODA spending departments adopt UN Standards on the definition of a child as being under 18 years of age.
- » The UK will increase its work to **build capability** across government departments. We will work with a new cross-government capability working group to promote ever greater alignment and sharing of knowledge and expertise.
- » The Ministry of Defence, The Department for International Trade and (pre-merger into FCDO in September 2020) The Foreign and Commonwealth Office and The Department for International Development have undertaken internal **sexual harassment surveys** amongst their own staff and are taking actions to respond to the findings in order to prevent and better respond to cases of sexual harassment across their organisations.
- » The Home Office have **published new guidance for staff on sexual harassment** which brings together in one place the range of support available to staff and the process for reporting.
- » The Department for International Development (now FCDO) refreshed its training on SEAH, rolled out **mandatory SEAH training** for all staff and developed deeper training for specific roles across the organisation. Safeguarding has been incorporated into Official Development Assistance training across The Department for Trade and development of bespoke and comprehensive training materials is underway.
- » The Department for International Trade has appointed the Chief Operating Officer as **Safeguarding Champion** to provide senior support for this agenda.
- » In 2020 the Department for International Trade launched a **comprehensive Safeguarding Policy** which sets out requirements of all staff, including requirements to report and the investigations process.

C) Delivering programmatic change across UK Aid programmes

The UK will ensure all UK Official Development Assistance upholds the global standards on safeguarding against sexual exploitation and abuse and sexual harassment.

We will do this by:

- » **Applying the Due Diligence Assessment.** The Due Diligence Assessment of all UK Aid partners has been strengthened and their performance on safeguarding against sexual exploitation abuse and sexual harassment will continue to be assessed in six areas to ensure they meet the standards we require.
- » **Providing clear expectations of partners.** The UK has strengthened and will keep under review the wording we use in funding agreements for partners and suppliers to ensure the obligation of all to uphold safeguarding standards and behaviours is clearly understood and implemented.
- » **Supporting the Humanitarian Quality Assurance Initiative (HQAI) to deliver verification of the Core Humanitarian Standard** that provides quality assurance and helps to raise and maintain standards, improve transparency and improve capacity for local NGOs.
- » **Making full use of the programme delivery cycle.** The UK will continue to mainstream safeguarding against sexual exploitation and abuse and sexual harassment throughout our programme cycle, using tendering processes, design phases, risk assessments and risk management, regular reporting, routine monitoring and evaluations to assess the implementation of safeguarding standards at the delivery level. We will use these processes to learn and adapt our programming.
- » **Including prevention and response to sexual exploitation and abuse and sexual harassment in UK contextual and programming analysis** of contributing issues such as gender, social impact, inclusion and within our Public Sector Equality Duty assessments.

The Six Pillars Assessed within FCDO's Due Diligence on Safeguarding Against Sexual Exploitation, Abuse and Sexual Harassment

We will hold ourselves to at least the same high standards we require of our partners

- i) A Safeguarding Policy with a strong SEAH element must be in place
- ii) A Whistle-blowing or Complaints Policy must be in place (or included in the Safeguarding Policy)
- iii) Human resource policies, procedures and training must prioritise prevention and response to Sexual Exploitation, Abuse and Sexual Harassment
- iv) Risk Management processes prioritise prevention and response to SEAH
- v) Code of Conduct for staff and all partners must be in place and include prohibition of Sexual Exploitation, Abuse and Sexual Harassment
- vi) Governance and accountability structures within organisations are in place and made full use of to prevent and respond to Sexual Exploitation, Abuse and Sexual Harassment and are used to drive up organisational standards

These 6 pillars are based on the IASC and CHS global standards and implement our commitments under the OECD DAC SEAH Recommendation 2019.

- » **Building the capacity and capability of partners.** The UK has set up a new Safeguarding Resource and Support Hub to support capacity building of both our partners and other members of the aid sector throughout the delivery chain.
- » **Providing resourcing to partners where needed** to ensure that their programmes and delivery chains prevent and respond to sexual exploitation and abuse and sexual harassment in a victim and survivor-centred way. The UK encourages partners to be clear where safeguarding to the required standard requires additional funding and we will allocate funds on a case by case basis.

Examples of Implementation:

- » In 2020 the Department for International Development (now FCDO) launched a new **Beneficiary Engagement guide** for staff to improve the quality and consistency of participation and engagement across programme design and implementation. Safeguarding is an important area that can be strengthened through listening to and working more closely with the communities and beneficiaries with whom the aid sector engages.
- » The Home Office has sought **independent verification** of safeguarding standards across programmes such as the Modern Slavery Innovation Fund to ensure quality and effectiveness of safeguarding measures.
- » In 2020 the Department for International Development (now FCDO) launched **new training** for programme managers on safeguarding across the programme management cycle.

One UK Government, One Strategy

The UK's vision is an aid sector free from sexual exploitation and abuse and sexual harassment. Safeguarding against sexual exploitation and abuse and sexual harassment is everyone's responsibility. We will achieve transformational change if we work together.

The UK will:

- i) Continue to provide **global leadership** to tackle SEAH.
- ii) **Hold ourselves to at least the same high standards** we expect of others. We will not ask our partners to reach standards that we will not meet ourselves.
- iii) Remain **committed to delivering the 4 Strategic Shifts** to transform the sector so that **anyone who comes into contact with the aid sector is assured that they will be treated with respect and dignity and be free from undue fear of Sexual Exploitation, Abuse and Sexual Harassment.**
- iv) Hold ourselves to **account** for delivering this Strategy through transparent reporting in our Annual Reports, scrutiny from the UK's Independent Commission on Aid Impact and relevant committees of the UK Parliament, internal management and board oversight, and periodic public reporting against the 2018 London Safeguarding Summit commitments.

Agreed by all UK Government Departments who spend ODA (list correct at time of publication)

- » Foreign, Commonwealth & Development Office
- » Cabinet Office
- » Department for Business, Energy and Industrial Strategy
- » Department for Digital, Culture, Media & Sport
- » Department for Education
- » Department for Environment, Food & Rural Affairs
- » Department of Health and Social Care
- » Department for International Trade
- » Department for Work and Pensions
- » Her Majesty's Revenue and Customs
- » HM Treasury
- » Home Office
- » Ministry of Defence
- » UK Statistics Authority

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from the British people