

Progress Report – One year on from the October 2018 London Safeguarding Summit

PUTTING PEOPLE FIRST
TACKLING SEXUAL EXPLOITATION, ABUSE
& HARASSMENT IN THE AID SECTOR

OCTOBER 2019

Contents

Introduction and Summary	2
Highlights and Trends	4
1. Donors	6
2. United Nations	10
3. International Financial Institutions	13
4. UK NGOs	16
5. UK Private Sector Suppliers	19
6. Research Funders	22
7. CDC Group	25
8. Gavi and Global Fund	27

Introduction and Summary

On 18 October 2018, the UK Department for International Development (DFID) hosted a summit on tackling sexual exploitation and abuse and sexual harassment (SEAH) in the international aid sector.

This was a pivotal moment for stakeholders across the sector – including donors representing 90 per cent of global Official Development Assistance (ODA), the United Nations (UN), international financial institutions (IFIs), UK non-governmental organisations (NGOs),¹ UK private sector supply partners, research funders, CDC Group, and Gavi and the Global Fund – which came together and made [commitments](#) for root-to-branch change in the way the sector operates.

The commitments were designed to bring about four long-term changes to drive up standards:

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;
4. Strengthen organisational capacity and capability across the international aid sector, including building the capability of implementing partners to meet the minimum standards.

While the London summit was an important moment, the commitments signalled a strong appetite to increase momentum on safeguarding rather than being an end in themselves. Safeguarding against SEAH is a long-term agenda, requiring leadership and culture change at all levels. Donors, their partners and the aid sector as a whole must not become complacent; we must hold ourselves accountable for following through on these commitments and continuing to learn and improve.

Since August 2018, DFID has been working closely with a Cross-Sector Safeguarding Steering Group (CSSG), which includes representatives from all eight groups or organisations that made commitments at the summit, alongside independent voices. The CSSG has facilitated a light-touch process for organisations across the aid sector to report back on progress. It provides an informal and safe space to share best practice, opportunities and challenges, informed by independent expertise, to increase coherence across the sector.

While accountability for ensuring implementation of the summit commitments lies with organisations themselves, safeguarding against SEAH is a shared responsibility. In this spirit, representatives from each of the groups and organisations that made commitments have consulted their wider constituents to provide a summary of progress made since October 2018. They have also shared challenges and lessons, data and case studies to illustrate evidence of change.

This report does not capture everything. Rather, it is a summary of cross-sectoral progress and learning. The eight groups that signed commitments reported back on their own progress, highlighting some encouraging trends as well as challenges that still need to be addressed. Since October 2018, good progress has been made in tackling SEAH throughout the aid sector. There

¹ UK-based NGOs, coordinated by Bond, signed up to commitments at the safeguarding summit. The NGO sector more broadly has also been heavily involved both in the run-up to, and after, the summit. The International Council of Voluntary Agencies (ICVA) sits on the CSSG, alongside Bond, as a representative of the international NGO sector.

has been a lot of innovation, including the start of a pilot project with INTERPOL, new tools for NGOs (with further tools in the pipeline for NGOs, private sector suppliers and investment institutions), and a data tracking tool for SEA cases in the UN. But sustained efforts and strong leadership are required to keep this issue a priority and ensure victims and survivors receive the support and follow-up they deserve.

It will take time for new initiatives to bed in and demonstrate real impact. The CSSG plans to issue a further progress report in October 2020. Over the next year, we expect to see more examples of how actions taken since the safeguarding summit in October 2018 have helped to keep people the aid sector works with safe from harm.

Highlights and Trends

- 1. Thirty major donors agreed a single approach to tackling sexual exploitation, abuse and sexual harassment (SEAH), by adopting the [DAC Recommendation on Ending SEAH in July 2019](#).** As the first international instrument to address SEAH across the aid sector, this is an important achievement and will be a crucial tool both for holding donors to account and for engaging partners consistently on SEAH.
- 2. Cross-sector collaboration to weed out perpetrators of SEAH is showing early signs of success.** Donors and their partners have been developing and supporting measures to prevent offenders from entering and moving around the sector, including a scheme run by INTERPOL to strengthen vetting of potential employees; the [Misconduct Disclosure Scheme](#) to check for previous misconduct linked to SEAH (which has already prevented 10 people from being re-hired); and an Aid Worker Passport to prove an individual's identity and vetting status. Meanwhile, the UN launched its ClearCheck system in 2018, which is an electronic screening tool to ensure that UN personnel dismissed due to substantiated allegations of SEAH are not rehired in another part of the UN system. Meanwhile, some organisations – including Gavi, Global Fund, and others – have strengthened their recruitment practices by including explicit questions about previous allegations of SEAH and other abuses of power in reference checks.
- 3. Across all stakeholder groups, safeguarding policies, practices and resourcing have improved over the last year.** NGOs, private sector suppliers, IFIs and other implementing partners, such as Gavi and the Global Fund, all report that they have strengthened safeguarding policies and codes of conduct for both staff and partners, introduced mandatory training for new and existing staff, and increased financial and staff resources allocated to safeguarding. Several organisations, including CDC, Gavi and Global Fund have appointed safeguarding champions at board or senior management level.
- 4. Accessible and tailored tools and guidance are being developed to prevent and respond to SEAH.** NGOs have produced guidance on [safeguarding governance](#) and [report-handling mechanisms](#), with a tool on leadership and culture to be finalised later this year. Research funders conducted [an in-depth evidence review](#) to identify good safeguarding practice in international development research, which will result in principles and good practice guidance for organisations conducting development research. Meanwhile, a group of IFIs and CDC are developing a safeguarding Good Practice Note for the private sector, due to be finalised in early 2020. DFID's Resource and Support Hub, the inception phase of which will start in Autumn 2019, will facilitate access to these and other resources.
- 5. Providing adequate support to victims and survivors remains a crucial challenge.** There are many hurdles to supporting people who experience SEAH and bringing perpetrators to justice, as well as limited information on 'what works' in terms of reporting mechanisms. In addition, more needs to be done to understand how to support vulnerable groups, such as people with disabilities. Current efforts to address this challenge include a dedicated [UN Trust Fund](#) that aims to support victims of sexual exploitation and abuse. Further work will still be required. Donors and their partners will need to integrate the needs of victims and survivors at all stages of programme design and implementation.
- 6. Culture change and leadership from the top is essential to address the power imbalances that lead to SEAH.** SEAH in the aid sector has occurred because individuals

have been able to exploit power imbalances. Changing this requires changing the behaviour, expectations and mindsets of individuals and, in some cases, whole organisations. It is encouraging that work is being done across the sector to improve organisational culture – including a new NGO tool and the appointment of safeguarding leads and champions in numerous organisations. However, as with any sort of culture change, this will be a long-term process, requiring sustained effort and investment over many years.

7. **Ensuring adequate safeguarding standards can be a challenge when working in complex supply chains, or when direct engagement with beneficiaries is led by partners.** NGOs and private sector suppliers have found that safeguarding awareness, capacity and resources in their downstream partners varies and it can be difficult to ensure that adequate reporting mechanisms are in place and that roles and responsibilities around receiving and investigating concerns are clearly understood. Bond is developing support and guidance for NGOs on working with partners, which should be finalised early next year, to help address some of the safeguarding challenges related to working with and through partners.
8. **Tailoring safeguarding approaches to diverse contexts remains a challenge.** In some countries or contexts the term ‘safeguarding’ is not easily understood. People may need to be sensitised to what is acceptable or unacceptable behaviour. Adapting processes and policies to different cultural or legal contexts and applying standards in a consistent way is often resource-intensive, requiring information that is not readily available. While tools and guidance are being developed throughout the sector to address this challenge – including a culture-sensitive reporting toolkit and list of safeguarding definitions for NGOs; mapping of victim support services by the UN; and the UK’s Resource & Support Hub, which will signpost in-country training providers and services – more work is needed.
9. **Data is a challenge for the sector, though there is appetite to improve consistency and transparency of reporting.** When gathering data for this report, it became clear that most stakeholder groups do not compile aggregate data on the number of SEAH incidents or reports. One exception is the UN, which systematically collects and publishes its data on SEA, and reports it annually. DFID published data on SEAH cases in its 2018 and 2019 annual reports, and other donors plan to do the same from 2020. IFIs have provided data across the group. Some stakeholder groups conducted surveys to indicate whether the number of SEAH reports has increased, decreased or stayed the same since last year. Others chose not to report data this time. We hope that next year, the available data across the sector will have increased. Given the known problem of underreporting of SEAH and the range of measures taken over the last year to address this, at this point an increase in the number of reports may indicate increased willingness and ability to report, rather than an increase in incidents.
10. **Ensuring gender balance and an inclusive workforce are an important step for tackling power imbalances.** Several organisations have taken steps to improve the gender balance of their senior management and staff, recognising the role gender plays in power imbalances and that women are often more at risk of SEAH. For instance, Gavi and the Global Fund are committed to achieving gender parity in senior management and throughout their workforces. Both were certified as equal salary employers by the Equal-Salary foundation in 2019. CDC is also working to improve the gender balance in its senior management, which was one of CDC’s summit commitments. In February 2019, CDC also committed to Her Majesty’s Treasury’s Women in Finance Charter, which requires actions to improve gender diversity.

1. Donors

Introduction

At the October 2018 safeguarding summit, 22 donors² signed up to an ambitious set of 22 commitments to prevent sexual exploitation and abuse and sexual harassment (SEAH) in the aid sector and to respond better when it does occur. Each agreed to take action on the commitments according to their own priorities and systems and to assess progress 12 months later. Donors engage on SEAH through quarterly technical working group meetings, informal subject-specific exchanges and through the Development Assistance Committee (DAC) process. Below are a few highlights from the past twelve months. Further detail can be found in the more detailed [Donor Report](#).³

Donors: commitments to tackle sexual exploitation and abuse and sexual harassment in the international aid sector

Commitments made by donors to tackle sexual exploitation and abuse and sexual harassment in the international aid sector

<https://www.gov.uk/government/publications/donors-commitments-to-tackle-sexual-exploitation-and-abuse-and-sexual-harassment-in-the-international-aid-sector>

Progress

1. **Thirty major donors agreed a single approach to tackling SEAH** – The Development Assistance Committee (DAC) of the Organisation for Economic Cooperation and Development (OECD) is made up of 30 major donors who, between them, provide around \$130 billion in aid each year. Twenty-one of the 30 DAC members signed the London commitments, which included supporting the formulation of a DAC instrument to set and implement standards on preventing and managing the risks of sexual exploitation and abuse in development cooperation, and drive donor accountability in meeting them. After eight months of negotiation, including expanding the scope to include sexual harassment, the [DAC Recommendation on Ending SEAH](#) was adopted on 12 July 2019. It is the first international instrument to address SEAH across the aid sector and only the eighth DAC Recommendation since 1961. The Recommendation is closely aligned with the summit commitments. Implementation by all 30 donors and their partners will be monitored through the [DAC peer-review mechanism](#): reviews of about six countries will be published each year. A summary report of progress on SEAH covering all donors will be published within five years and at least every 10 years after that.

² Australia, Austria, Belgium (Ministry of Development Cooperation), Canada, Denmark, Finland, France (Ministry for Europe and Foreign Affairs of France), Germany, Iceland, Ireland, Italy, Japan (Ministry of Foreign Affairs of Japan), Luxembourg (Ministry of Foreign and European Affairs), Mexico (AMEXID), The Netherlands (Ministry for Foreign Trade and Development Cooperation), New Zealand (Ministry of Foreign Affairs and Trade), Norway, Spain, Sweden, Switzerland, United Kingdom (including the Scottish Government), United States of America (U.S Agency for International Development).

³ To sign up to the donor commitments, contact enquiry@dfid.gov.uk. To sign up your country or organisation to the DAC Recommendation, please email SEA_Taskforce@oecd.org.

2. **Strengthened and aligned SEAH language in funding agreements** – Donors committed to review and, where necessary, strengthen formal funding templates to reflect international standards on SEAH, and to include clear and specific language on sexual exploitation, sexual abuse and sexual harassment, including common definitions. Many donors have done that in the past year. Donors’ strong messaging that their partners must apply the same standards in their sub-grant and contract requirements for downstream partners is having a positive impact. In addition, donors have been collaborating to ensure that their requirements of partners are as aligned as possible. After six months of discussions, they are close to agreeing common language on SEAH to be used in future funding agreements with multilaterals. A further initiative to reduce duplication and transaction costs for implementing partners and donors has seen four of the London signatories supporting work to strengthen independent verification of partners’ adherence to the international safeguarding standards recognised by donors.⁴

3. **Higher standards in United Nations’ work** – Donors have provided collective and continued support for the UN Secretary-General’s [Special Measures](#) to tackle sexual exploitation and abuse across all UN operations. This is reflected through joint statements at UN Executive Board meetings, donors chairing SEAH roundtables at high-level UN events, and Heads of State or Government supporting an international media campaign at the UN General Assembly to support the UN Secretary-General’s [Circle of Leadership](#). Donors collectively supported the Secretary-General’s initiative to ensure that the UN funds and programmes report and certify SEAH allegations annually to their boards, and to the Secretary-General, alongside updates on strategy, actions, resources and partnerships. Donors will continue to support the UN to develop higher standards on safeguarding.

Challenges and Lessons

1. **More needs to be done to ensure victims and survivors of SEAH receive the help they need** – There are many hurdles to supporting people who experience SEAH as a result of the aid sector’s activities, including: a reluctance to report cases; a lack of safe and tangible support services; and the difficulty of bringing perpetrators to justice. Some donors have taken measures to make it easier to report cases or concerns and others have set out publicly their policies for supporting victims and survivors. The Netherlands is leading work on testing and reviewing best practice on reporting systems (including ombuds mechanisms) and their impact on accountability and support for survivor needs and rights. Several donors have contributed to initiatives led by the UN Victims’ Rights Advocate and a dedicated [UN Trust Fund](#) to support victims and survivors of sexual exploitation and abuse, strengthen community complaints mechanisms, and map local capacity to assist and support victims. These initiatives are important, but alone they won’t be enough. Donors recognise the need to incorporate support to victims and survivors of SEAH into the design of their programmes and policies.

2. **Donors have a responsibility to drive culture change, starting with themselves** – SEAH in the aid sector has occurred because individuals can exploit power imbalances. Changing this requires changing the mindsets of individuals and, in some cases, whole organisations. In the past year, donors have strengthened internal policies and procedures to help drive the cultural change required within their own organisations and, by extension,

⁴ These standards are: Inter-Agency Standing Committee (IASC) Minimum Operating Standards on Preventing Sexual Exploitation and Abuse (PSEA), and Core Humanitarian Standard (CHS). Verification would be conducted by the Humanitarian Quality Assurance Initiative (HQAI).

their partners. Some have financed the development of tools to improve organisational culture. This will be a long-term process, requiring sustained effort and investment over many more years.

- 3. It is necessary to join forces to stop perpetrators entering and moving around the sector** – Donors and partners have been developing and supporting measures to prevent offenders from entering and moving around the sector. There are real challenges to linking up human resources and information-sharing systems between organisations of the same family (e.g. NGOs), let alone making the necessary linkages between these and different types of organisation. There has been good progress on three initiatives in the past year. A scheme run by INTERPOL to strengthen vetting of potential employees (which is receiving £10 million from the UK) has entered the pilot phase, and a new Aid Worker Passport to prove an individual's identity and vetting status is in the early stages of development. Donors are also supportive of the [Misconduct Disclosure Scheme](#) to check if a potential employee has previous misconduct linked to SEAH, which has already started to yield results and root out perpetrators. A key lesson is the need to join up all three, across different parts of the sector, to maximise their impact and reduce the scope for loopholes.

Case Study

Cyclone Idai devastated communities in Mozambique, Zimbabwe and Malawi in March 2019, followed in April by Cyclone Kenneth. Building on commitments made at the London summit, and in line with the IASC commitment to provide expertise on preventing sexual exploitation and abuse (PSEA) to the highest levels of humanitarian coordination, several donors worked with international and local partners to take extra measures to minimise the risk of sexual abuse and sexual exploitation during the humanitarian response. This included supporting PSEA training for humanitarian service providers and agents, and strengthening child protection services to prevent and respond to violence, abuse and exploitation, including transactional sex. When reports emerged of people being asked to trade sexual favours for aid, quick action was taken in response.

One donor allocated almost \$500,000 of its overall Idai response to support PSEA and deployed humanitarian experts to examine the safeguarding aspects of the national and international responses. These experts worked with teams in all three countries to identify and mitigate safeguarding risks. Findings were shared with international organisations that often co-ordinate national and international humanitarian responses. The donor is finalising a safeguarding response protocol to help staff involved in future humanitarian responses to consider safeguarding risks, prevention, and how to better respond when incidences do occur.

Data

Data remains a challenge for the sector. DFID has published data on the number of SEAH reports in its 2018 and 2019 Annual Reports. Several other donors plan to report case numbers from 2020

UK/DFID: Transparency and public reporting (from DFID Annual Report, 2019)

There were fewer than 5 substantiated internal staff cases in the 2018-19 period covered by this report. The total number of allegations made about DFID staff in 2018-19 was also fewer than 5.

Since setting clear expectations that DFID partners would report credible suspicions and actual allegations of abuse [relating to DFID programmes], we have seen an increase in the number of safeguarding concerns being reported by DFID implementing partners, up from 73 referrals in 2017-18, to 260 in 2018-19.

- DFID receives reports of different types of safeguarding concerns. The most commonly reported in 2018-19 related to sexual exploitation and abuse of adults (28%), followed by other safeguarding concerns (27%) and sexual harassment (23%).
- In 2018-19, 82% of referrals were reported to DFID by partners, 15% were reported by DFID staff and 3% were reported anonymously.

2. United Nations

Introduction

The Secretary-General's commitments to eradicate sexual exploitation and abuse (SEA) are outlined in his annual reports on [Special Measures for Protection from Sexual Exploitation and Abuse](#) (A/73/744, A/72/751 and A/71/818). On 18 October 2018, members of the UN Secretary-General's Circle of Leadership⁵ presented a collective statement, endorsed by 25 UN entities, to reaffirm their commitment to support efforts to combat SEA across the UN system. The UN also presented its latest factsheet summarising its initiatives, progress made and timescales for future action. The UN publishes an updated version of this [factsheet](#) quarterly. On 24 September 2019, the Secretary-General launched a social media campaign on Twitter with the members of his Circle of Leadership, and others, to reiterate their commitment to tackling SEA.

Progress

1. **Transparent data** – In May 2019, the UN Secretariat rolled out an electronic tool to report SEA allegations internally, which helps align data and track investigations related to agencies, funds and programmes. In addition to real-time reporting of data on allegations related to personnel in peace operations, since 2017 the UN has reported quarterly on all allegations related to personnel at its agencies, funds and programmes, as well as allegations related to personnel of non-UN international forces operating with Security Council mandate.
2. **UN ClearCheck system** – This screening tool was launched in 2018 to ensure that UN personnel dismissed due to substantiated allegations of SEA and sexual harassment are not rehired in another part of the system. It includes records of those who left the organisation with a pending investigation or disciplinary case related to SEA. Twenty-nine UN entities have committed to participate in the system. This supports the UN's commitment to support consistent and co-ordinated implementation of policies and approaches to prevent the occurrence of SEA across the UN system, and the ongoing need to ensure accountability for perpetrators. The UN is receiving support from the UK, through collaboration with the UK Permanent Mission to the United Nations in New York, to undertake a study on the feasibility of extending the ClearCheck database to include other types of misconduct beyond sexual exploitation and abuse and sexual harassment, and to include other partners beyond the UN system including humanitarian organisations.
3. **Implementing partner protocol** – In 2018, the UN finalised its protocol on allegations of SEA involving implementing partners, which sets out minimum standards for UN entities engaging with partners. In 2018, this was circulated to all UN agencies, funds and programmes. Some agencies have already taken steps to strengthen compliance with the protocol – for instance, in January 2019 the UN Population Fund (UNFPA) developed new training modules for partners on preventing SEA.
4. **System-wide policies and frameworks to prevent sexual harassment** - The Chief Executives Board Task Force on Addressing Sexual Harassment Within the

⁵ In October 2018, this comprised 49 member states and 19 UN entities.

Organisations of the UN System has developed a uniform system-wide model policy on sexual harassment to align the policies of separate UN organisations, as well as a harmonised mechanism for system-wide collection and analysis of data; a common guide for managers to prevent and respond to sexual harassment in the workplace; and a framework for best practices for hotlines or helplines to provide support to victims and witnesses of sexual harassment. In July 2019, with the support of the UK Permanent Mission to the United Nations in New York, the Task Force launched a model Code of Conduct to Prevent Harassment, including Sexual Harassment, at UN System Events. This was developed in collaboration with the New York-based Group of Friends to Eliminate Sexual Harassment. The Task Force continues to work on strengthening the capacity and quality of investigations involving cases of sexual harassment across the UN system.

Challenges and Lessons

1. **Combating sexual exploitation and abuse requires the determination and effort of all parts of the UN system** – Institutionalised mechanisms are necessary to foster an ethos of accountability within the UN. Meanwhile, sustained engagement at senior levels, both in the field and headquarters, is fundamental to prevent and respond effectively to SEA.
2. **Sexual exploitation and abuse are broader than conduct and discipline matters** – Gender imbalances and lack of respect for human rights create an enabling environment for these harmful behaviours. Strengthened prevention measures must be undertaken, including through identifying risks early on in UN deployments and strategies to mitigate them.
3. **Rapid turnover of personnel and leadership can pose a challenge** – While the UN has made some progress in changing behaviour by instituting accountability and awareness among existing personnel, the challenge is to maintain vigilance given the rapid turnover of personnel and leadership across the system.

Case Study

The Inter-Agency Standing Committee (IASC) brings together the main humanitarian response agencies from the UN, NGO consortia, the Red Cross/Red Crescent movement, and the World Bank. In November 2018, the IASC committed to a vision of a humanitarian eco-system in which people caught up in crises feel safe and respected and can access assistance without fear of sexual exploitation, abuse or harassment (SEAH) by any aid worker, as articulated in the [Strategy on Protection from and Response to SEAH](#). The IASC Champion promoted a [Plan for Accelerating Response](#) at country level, focusing on three priority areas: 1) safe and accessible reporting; 2) survivor-centred assistance; 3) accountability, including investigations.

In response, IASC members have scaled up investments in preventing sexual exploitation and abuse (PSEA) to deliver results for communities affected by crises. These include a [fund for investigations](#), and IASC members committing support to 32 priority countries facing humanitarian emergencies, in line with the three priorities above. UN agencies have also committed to filling gaps in PSEA coordinators, so that 26 out of 34 countries with humanitarian crises have dedicated capacity to coordinate system-wide responses and approaches. IASC members' [good practices](#) are compiled biannually to promote learning. Humanitarian Coordinators lead PSEA work at country-level, setting the tone from the top that SEAH has no place in the humanitarian community.

Data

The UN publishes data on sexual exploitation and abuse allegations in its peace operations in real time and allegations related to personnel of its agencies, funds and programmes on a quarterly basis. Below is a snapshot of annual trends:

- In Peacekeeping Operations, allegations have decreased (54 in 2018, 62 in 2017, 104 in 2016).
- The number of allegations received by other UN entities has increased (94 in 2018, 50 in 2017)
- There was also significant increase in allegations involving non-UN personnel working for UN implementing partners (109 in 2018, 25 in 2017).

To improve data related to sexual harassment in the UN system, in November 2018 the Task Force led by the UN Secretariat conducted the first system-wide Safe Space: Survey on Sexual Harassment in Our Workplace, surveying the views of all staff and non-staff personnel across 31 UN system and related organisations. The report was shared with UN staff by the Secretary-General when received by the UN in January 2019. The survey identified that one third of UN staff and contractors have experienced sexual harassment in the past two years. Seventeen percent of staff completed the survey. The data received through the survey and subsequent analysis forms the basis of action plans and initiatives within each UN system organisation to help prevent sexual harassment, support the victims and hold perpetrators accountable.

3. International Financial Institutions

Introduction

On 18 October 2018, 10 International Financial Institutions (IFIs)⁶ reaffirmed their commitment to advance standards to prevent Sexual Exploitation, Abuse and Harassment (SEAH). They committed to strengthen efforts to create an environment where SEAH is rejected and take further steps to address SEAH. The IFIs agreed to maintain and advance standards to prevent SEAH through seven common principles.⁷ Recognising that each IFI differs in its policies and procedures, a snapshot is provided below of the efforts being made by IFIs to deliver on their 2018 commitments.

International Financial Institutions: commitments to tackle sexual exploitation and abuse and sexual harassment in the international aid sector

IFI Update on the Joint Statement on Continuous Advancement of Standards to Prevent Sexual Harassment, Abuse and Exploitation

<https://www.gov.uk/government/publications/international-financial-institutions-commitments-to-tackle-sexual-exploitation-and-abuse-and-sexual-harassment-in-the-international-aid-sector>

Progress

1. **Institutional measures** – Many IFIs have enhanced institutional policies and procedures for reporting SEAH, as well as awareness-raising tools to prevent and respond to SEAH incidents. Most IFIs have also rolled out training programmes, including information sessions on workplace core values and management outreach to highlight the role of leadership in preventing and responding to SEAH. Induction of new staff includes training on codes of conduct and SEAH in order to increase employees' ability to identify and report SEAH issues.
2. **Operational measures** - Many IFIs are reinforcing the capacity of clients and partners to develop and implement policies or mechanisms to prevent and respond to SEAH. Some

⁶ 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.

⁷ **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 programmes 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.

IFIs have reviewed their environmental and social safeguard policies to strengthen requirements related to SEAH. This means there will be more systematic screening for SEAH-related risks in project appraisals, thereby improving mitigation plans and monitoring. Some IFIs have updated their standard procurement documents to reflect SEAH and environmental and social issues. In addition, some IFIs are reviewing their action plans and strategies on gender equality to ensure these are effective for preventing and addressing SEAH.

3. **Development of guidance and tools** - Some IFIs are developing good practice notes and associated training to strengthen clients' and partners' understanding of SEAH and how to prevent it. For example, the European Bank for Reconstruction and Development (EBRD) and International Finance Corporation (IFC) are developing a Good Practice Note for the private sector on addressing gender-based violence and harassment (GBVH), with support from CDC. Some IFIs have improved screening of investment projects, using a gender-based violence risk-screening tool at country and project levels. Others are developing similar screening and assessment tools, to be piloted during the project pre-investment process.

Challenges and Lessons

1. **Providing effective training on safeguarding against SEAH to a multicultural workforce can be challenging** - Some IFIs have reported staff discomfort at discussing SEAH-related topics in certain settings, regions and cultures, especially where such conversations are considered taboo. It can also be challenging to identify qualified specialists, with a solid understanding of operational requirements, to deliver such training. In some cases, this has necessitated recruitment of experts to support policy development, training and rollout of SEAH programmes. For some IFIs, collaboration between different departments has proven useful in handling the multi-dimensional nature of SEAH.
2. **Monitoring and reporting of SEAH in remote locations poses a challenge** - Project staff need to be trained to ensure that SEAH risk mitigation measures have been put in place and are being implemented as part of periodic project monitoring activities, even in hard-to-reach locations. Approaches to building the capacity of staff on SEAH risk mitigation need to be adapted to specific contexts – there is no one-size-fits-all solution.
3. **Greater IFI alignment is needed for working with government counterparts and implementing teams** – The importance of alignment of IFIs' SEAH requirements to ensure consistency in approaches and ease of dialogue with government counterparts and implementing agencies cannot be overstated. It will be necessary for IFIs to reach agreement and consensus on one strong legal definition for SEAH in their operations.

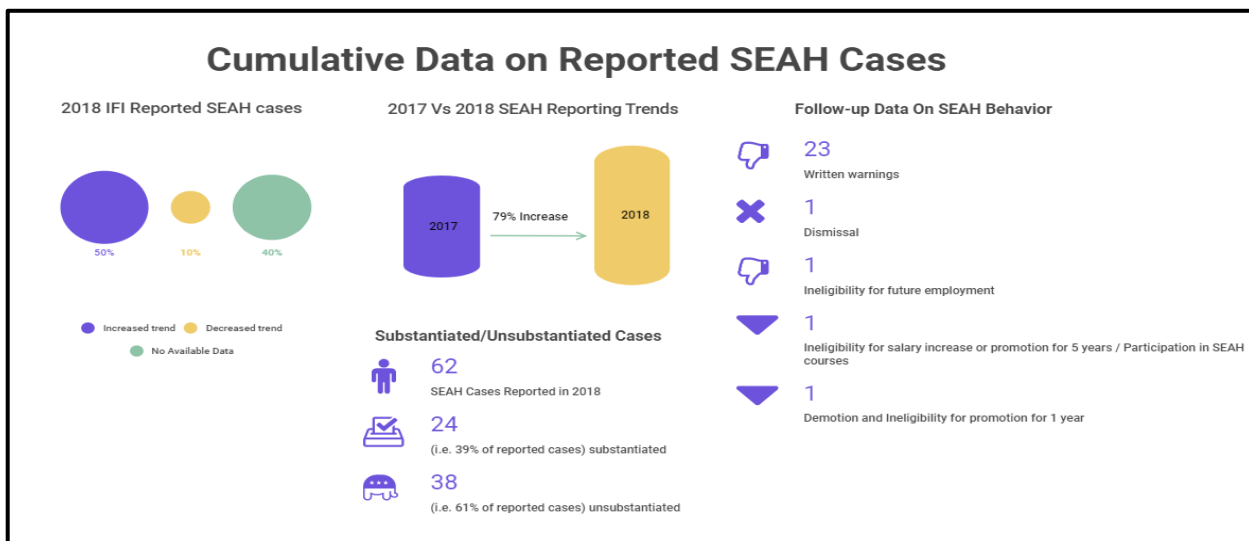
Case Study

As part of its efforts to establish, maintain and raise safeguarding standards, one IFI has approved a new Environmental and Social Policy (ESP), requiring clients to take measures to prevent and address any form of violence and harassment – including SEAH, gender-based violence, bullying, intimidation, and/or exploitation. The policy, effective from 1 January 2020, means that the IFI will screen systematically for gender-based violence risks in projects. In October 2019, the IFI provided issue-based training to its staff, including on gender-based violence and harassment risks, to build capacity for implementing the new requirement.

Going beyond its responsibility to prevent SEAH from being perpetrated by its staff or partners, another IFI has also built SEAH-sensitive components into some programmes. For instance, when a UN Women survey showed that 99% of women in one country had experienced sexual harassment – particularly on public transport – the IFI included a technical assistance element in a project to finance upgrades of the country’s rail system, to improve gender accessibility and reduce SEAH risks. The IFI worked with the loan recipient (the national rail company) to introduce measures including a telephone hotline, improved lighting, and more trained security personnel at stations. The IFI delivered training on harassment to national rail staff and is supporting the establishment of a Sexual Harassment Prevention Committee. The work was championed by the company’s chairman and covered in the nation’s newspapers.

Data

The IFIs promoted a speak-up culture in 2018, which contributed to an increasing trend in number of SEAH reports. Therefore, out of nine⁸ IFIs that contributed to this update report, five indicated an increase in reported SEAH cases year-on-year, most of which were reported by staff within these organisations. Only one IFI reported a slight decrease in number of reported cases. The other four IFIs opted not to share their data for confidentiality purposes.



⁸ The IMF did not participate in this update report, as the questionnaire did not align well with its operations. However, it continues to fully support the principles adopted in the April 2018 Joint Statement and the October 2018 Summit Commitments and has taken steps to address safeguarding against SEAH.

4. UK NGOs

Introduction

On 18 October 2018, UK international development non-government organisations (NGOs) presented a set of commitments to tackle sexual exploitation, abuse and harassment (SEAH). These were developed by Bond, in consultation with four NGO safeguarding working groups and wider Bond membership.⁹ The commitments underpin Bond's safeguarding principle, which was integrated into the [Bond charter](#) in November 2018, and set out NGOs' approach to improving the quality and consistency of their safeguarding practices. The commitments are designed to be flexible, so implementation will vary across organisations. Bond is monitoring progress against the commitments through surveys and focus groups, and will report back on this at a safeguarding event in December 2019.

UK Non-Governmental Organisations: commitments to tackle sexual exploitation and abuse and sexual harassment in the international aid sector

Our commitment to change in safeguarding

<https://www.gov.uk/government/publications/uk-non-governmental-organisations-commitments-to-tackle-sexual-exploitation-and-abuse-and-sexual-harassment-in-the-international-aid-sector>

Progress

1. **Development of tools and resources for the NGO sector** – Over the past 18 months, Bond has collaborated with four NGO working groups to develop practical tools and guidance related to particular aspects of safeguarding against SEAH. These working groups included more than 50 individuals from organisations that are members of Bond. The working groups have published guidance, tools and resources on [safeguarding governance](#) and [report-handling mechanisms](#). They will publish tools on leadership and culture later this year.
2. **Improved safeguarding policies, procedures and practices** - NGOs have reviewed and, where relevant, updated their safeguarding policies, protocols, codes of conduct, training offer and recruitment practices. In a recent Bond survey, almost three quarters of respondents said their organisations had increased resourcing for safeguarding since February 2018, and a similar share of respondents said there had been an increase in board agenda time spent on safeguarding. Sixty-one percent of respondents said board-level oversight of safeguarding had increased within their organisations since February 2018.
3. **Support for the [Inter-Agency Misconduct Disclosure Scheme](#)** – The NGO safeguarding working groups and other Bond members have supported the Steering Committee for Humanitarian Response (SCHR) to develop this scheme, which establishes a minimum standard for organisations to share information as part of their

⁹ Bond, the UK international development network, has 400+ NGO members.

recruitment process. It is designed to prevent people who have committed sexual abuse, sexual exploitation or sexual harassment 'misconduct' during employment from moving around the sector undetected. So far, 14 organisations have formally signed up to the scheme and this number is expected to increase. As of September 2019, there had been 1,475 requests for information through the scheme, 1,050 of which received a response (many from non-signatories to the scheme).¹⁰ This prevented the hiring of 10 staff, of which two were definite abusers and eight had gaps in their record they were unable to address.

Challenges and Lessons

1. **Working in diverse contexts with different cultural norms and legal frameworks remains a challenge** – Safeguarding people effectively requires tailoring policies and processes to local contexts. Applying the highest safeguarding standards consistently across different contexts is often complex, requires substantial resources and can depend on information that is not easily accessible (e.g. processes for criminal record checks, information about referral pathways to local support services). Bond is supporting NGOs to adapt their safeguarding activities to different contexts (e.g. through a report-handling toolkit that has been tested in different countries and a set of safeguarding definitions to increase understanding of commonly-used safeguarding terminology). Bond has also supported NGOs to find ways to share information and resources with colleagues in-country, such as directories of survivor support services. Continued efforts will be needed to tailor safeguarding approaches to the varied contexts in which NGOs work.
2. **Collaborating with downstream partners and ensuring that safeguarding is implemented in partnership with local organisations can pose challenges** – Many initiatives in the NGO sector to date have focused on developing quick solutions to improve safeguarding practices (e.g. new guidance and training) or to comply with international standards or donor requirements. As a result, partner-led initiatives have not played a significant role in resolving complex in-country safeguarding issues or tailoring safeguarding practice to local contexts. Safeguarding as a word and as a concept is not easily understood in some contexts. Remediating this requires engagement with local partners, beyond check-lists and compliance. To help address this issue, Bond is developing support and guidance for NGOs on working with downstream partners, including context-specific resources.
3. **Time and financial resources are a much-cited constraint, particularly for smaller NGOs** – There are few suitable guidance or training materials available for small organisations. In addition, a proliferation of standards with similar but slightly different requirements adds to the administrative burden for organisations. This will partially be addressed through DFID's Resource & Support Hub, to be launched later this year, which will provide resources tailored for smaller organisations.

¹⁰ The response rate is 71% to date, which is expected to increase over time. Non-responses by non-signatory agencies are likely to be due to these organisations not yet having the systems or the legal confidence to reply.

Case Study

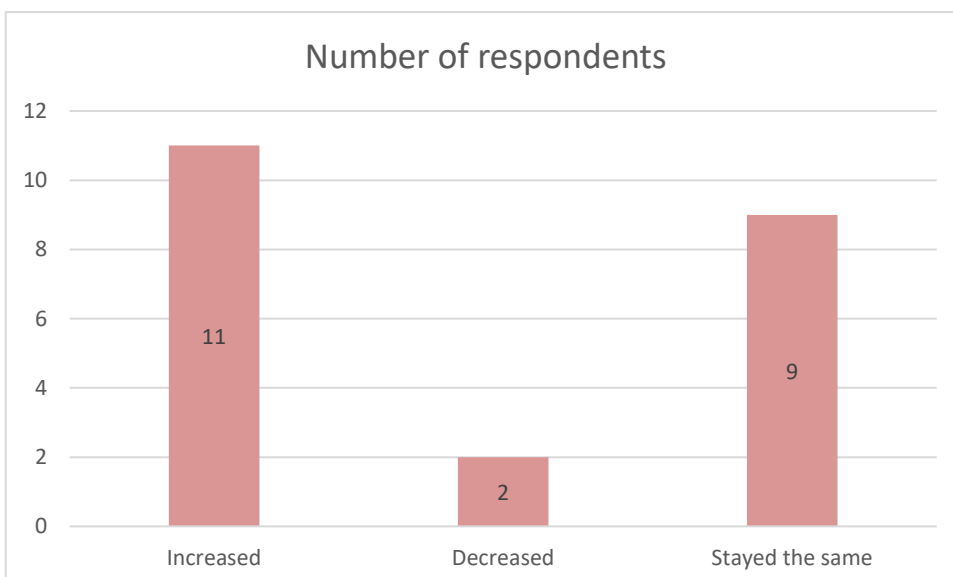
Over the past year, seven NGOs based in Africa, Asia and the UK have developed the [South2South \(S2S\) Safeguarding Training and Consultancy Network](#). The network currently includes global safeguarding practitioners and expert organisations from The Gambia, Sierra Leone, Tanzania, Kenya, Nepal and the UK, with experience in training frontline staff in local and international NGOs, providing support and advice to government institutions and being an expert voice at national and international conferences on safeguarding. Initiatives in 2018 and 2019 include work with national and local governments, donors, faith-based organisations, schools, international and local NGOs, and local community-based organisations.

Together, the network develops, delivers and champions high-quality, locally relevant and culturally appropriate training, advice and guidelines, raising awareness and sharing contextual insights and expertise that only come from being based in the countries where safeguarding issues are being addressed. The network also ensures the voices of smaller organisations and the children and families they support are heard, and challenges the assumption that safeguarding knowledge is only held in the Global North, as Southern-led NGOs demonstrate their expertise through the network's initiatives.

Data

Bond asked NGOs through a survey on its website from mid-August 2019 onwards whether the number of safeguarding incidents reported in their organisations is higher, lower or broadly the same as a year ago. The aim of the survey was to give a snapshot of how safeguarding reports have changed over the last year. Twenty-two organisations responded to the survey; a summary of the results is provided below.

Changing cultures, greater transparency and better internal processes and protection in NGOs are likely to lead to an increase in the number of safeguarding incidents reported, now and in the near future. An increase in reported cases is an indication that both safeguarding issues and issues of respect in the workplace are being raised more successfully in NGOs.



5. UK Private Sector Suppliers

Introduction

On 18 October 2018, private sector suppliers that work with DFID presented a set of suggested commitments to prevent and respond to sexual exploitation, abuse and harassment (SEAH) in their organisations and projects. These were developed through consultations with around 30 of DFID's suppliers, the broader supply chain and other networks. In May 2019, private sector suppliers established a Safeguarding Leads Network (SGLN) which meets quarterly to monitor progress, share lessons and facilitate peer-to-peer discussions. The SGLN currently has 19 member organisations, all of which have signed up to the summit commitments.¹¹

UK Private Sector Organisations: commitments to tackle sexual exploitation and abuse and sexual harassment in the international aid sector

Commitments proposed by UK private sector supply partners who work with DFID to tackle sexual exploitation and abuse, and sexual harassment in the international aid sector

<https://www.gov.uk/government/publications/uk-private-sector-organisations-commitments-to-tackle-sexual-exploitation-and-abuse-and-sexual-harassment-in-the-international-aid-sector>

Progress

1. **Improving in-house capacity and expertise on safeguarding** – Several organisations have hired and/or appointed dedicated safeguarding experts and formed internal teams or working groups to ensure safeguarding issues are addressed properly. Many have clearly identified internal reporting lines and provided guidance to line managers on how to handle reports. Considerable progress has been made on communicating these mechanisms internally and with downstream partners. Suppliers also reported improvements to due diligence procedures and obtaining declarations from downstream partners to ensure standards are in place.
2. **Developing or strengthening relevant policies** – Suppliers have developed clear policy statements on safeguarding that complement and align with other related policies (e.g. Whistleblowing; Code of Conduct; Conflict of Interest; Bribery and Corruption; Equal Employment and Discrimination Free Workplace; and Modern Slavery). In some cases, these were subjected to external audit to ensure they meet best practice. Suppliers have refined policies and standard operating procedures, so decisions, actions and safeguarding reports are documented confidentially. Many policies now outline a clear response process and time period for action, enabling reports to be handled consistently and transparently. Safeguarding is now included in corporate-level risk registers and regularly discussed at board level.

¹¹ To request the Terms of Reference or join the SGLN, please write to safeguardingleadsnetwork@gmail.com. To join the Safeguarding Leads Network LinkedIn group for members, [send a request here](#).

3. **Safeguarding training for staff** – Suppliers have introduced communication and training related to safeguarding against SEAH, including compulsory induction training, online modules and in-country face-to-face training, as well as advanced training to equip safeguarding leads and staff with the necessary skills. Routine updates and reminders about policies are included in company-wide and team-specific communications. Safeguarding also forms an important element of due diligence and HR induction training for company staff and independent consultants. In addition, safeguarding compliance is being emphasised with supply chain partners, from the early stages of project discussions through to implementation.

Challenges and Lessons

1. **Ensuring adequate safeguarding standards can be a challenge when working in complex supply chains, or when direct engagement with beneficiaries is led by partners** – Suppliers noted challenges linked to the varied level of safeguarding awareness, capacity and resources in other organisations (both upstream and downstream partners), which may include a lack of adequate reporting mechanisms. Working with small suppliers or those that have not previously worked with DFID can pose additional challenges as their procedures may not be well-established or they may lack capacity to implement these effectively.
2. **Designing effective reporting mechanisms is a challenge** – There is limited information on ‘what works’ in terms of reporting mechanisms, making it challenging to provide context-appropriate and accessible programme-level reporting mechanisms. Suppliers noted that different partners in the supply chain need substantive capacity-building to understand what must be reported, what will happen and to whom, in order to ensure that all reports are escalated, investigated and acted upon appropriately. In some cases, such as grant-making programmes, this is beginning to be addressed by providing specific training as part of the solicitation process and including safeguarding in regular reporting procedures.
3. **Relying heavily on background checks during vetting and recruitment only uncovers prior incidents** – At present, background checks may not identify safeguarding incidents under investigation, individuals who have not been detected or opportunistic offenders (who may not have perpetrated SEAH in the past but may do so in future). Throughout the vetting process, suppliers must pay close attention not to violate privacy, defamation or slander laws, which can deter some organisations from providing a misconduct reference. Weak legal systems in some countries make it challenging to obtain accurate and timely criminal background checks. The fact that many consultants are contracted on a project-by-project basis (often for different donors), can exacerbate the challenge of getting accurate and complete references.

Case Study

In May 2019, one organisation launched a mandatory online training for its global workforce about sexual harassment in the workplace. In June, its headquarters received a report from an employee in a field office who recounted feeling pressured by a supervisor to offer sexual favours to obtain and retain employment. She said the training had encouraged her to report; she now understood that the supervisor’s behaviour was unacceptable and could

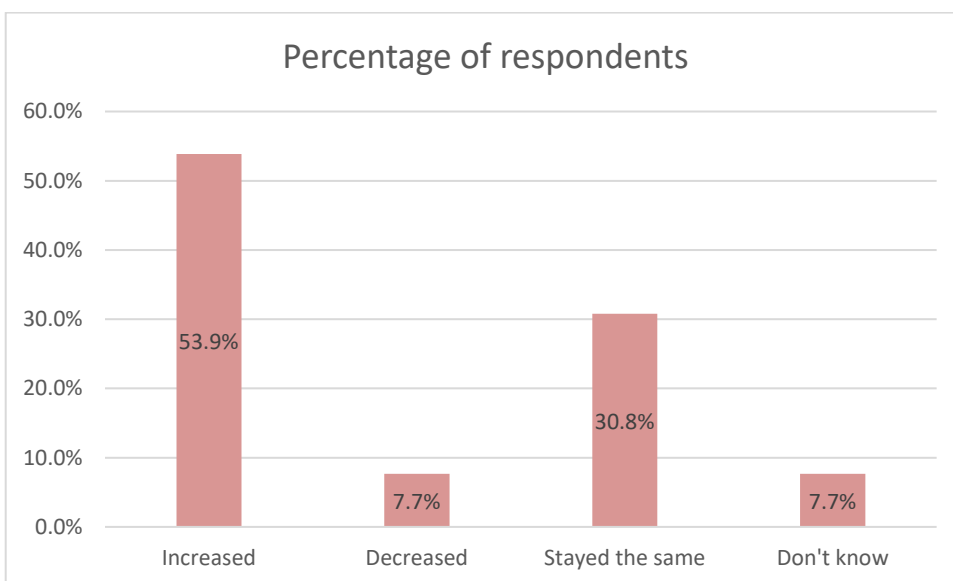
be directly reported to headquarters for investigation. Headquarters quickly investigated and concluded that sexual harassment had occurred. The organisation terminated the supervisor's employment and simultaneously mobilised a third-party provider to provide specialised mental health support to the affected employee.

The investigation revealed that the sexual harassment had previously been disclosed to several colleagues but no-one had escalated the issue, despite corporate guidelines. The organisation recognised that additional action was necessary to raise awareness among all staff about what should be reported, how to report, who should report (victims and bystanders), how whistleblowers are protected and the consequences of violating policy. It is now delivering bystander training to all employees and has highlighted safeguarding and bystander reporting in its internal communication materials (e.g. office posters).

Data

Member organisations in the SGLN keep internal records relating to the number of cases reported. SGLN members are committed to increasing transparency across the sector and improving how organisations collect data, in order to learn and track progress. Moving forward, SGLN members will work together with other stakeholder groups to prepare for collective reporting in the future.

In August 2019, the SGLN surveyed its member organisations and other suppliers, asking whether the number of reports of SEAH had generally gone up, down or remained the same over the last year, or whether these records were not kept. Thirteen organisations responded to the survey. While there were inconsistencies across organisations in terms of how a 'report' is defined, the overall trend of increased reporting was positive. The results below reflect both an increase in allegations of misconduct and an increase in queries related to potential policy breaches and requests for guidance. Taken together, this indicates an increased awareness of safeguarding and increased willingness to speak up without fear of retaliation.



6. Research Funders

Introduction

At the October 2018 summit, five research funders¹² jointly committed to prevent and tackle all incidents of sexual exploitation, abuse and harassment (SEAH), as well as other forms of harm, abuse, bullying and harassment, in international development research. They pledged to work with the development research community to raise standards in organisational culture, systems and practices, building on their experience in research ethics and integrity. They are working closely with the UK Collaborative on Development Research (UKCDR) to implement these commitments.

Research organisations: commitments to tackle sexual exploitation and abuse and sexual harassment in the international aid sector

International development research funders' statement on safeguarding

<https://www.gov.uk/government/publications/research-organisations-commitments-to-tackle-sexual-exploitation-and-abuse-and-sexual-harassment-in-the-international-aid-sector>

Progress

1. **Evidence review conducted** – Research funders committed to adopt an evidence-based approach, implementing change where the risk and need is greatest. Guided by a Safeguarding Funders Group and a Safeguarding Expert Advisory Group initially convened in 2018, UKCDR commissioned a team from the University of Sussex to launch an independent evidence review. This was conducted in March-April 2019 and aimed to characterise the nature of safeguarding issues and challenges in the international development research context, identify existing guidance and review its implementation. The outputs were published in June, including an [in-depth evidence review](#) identifying good practice based on literature, policy and media reviews, surveys and interviews with stakeholders, and a briefing paper.
2. **Principles and good practice guidance drafted** – Drawing on the evidence review, research funders developed a set of draft principles and good practice guidance on safeguarding to support international development research funders, universities, research institutes and other organisations conducting development research. UKCDR is contracting a consultant in October 2019 to undertake thorough and inclusive consultations with broader stakeholder groups in the UK and low- and middle-income countries to obtain feedback on the draft principles and good practice guidance, and ensure they are relevant, appropriate, feasible and effectively implementable. The expected output will be a finalised set of principles and good practice guidance, to support systemic and cultural change and enhance safeguarding in international development research.

¹² Signatories were members of the Strategic Coherence for ODA-funded Research (SCOR) Board: The Department for International Development (DFID); the Department for Business, Energy & Industrial Strategy (BEIS); the Department of Health & Social Care (DHSC); UK Research and Innovation (UKRI); and the Wellcome Trust.

Challenges and Lessons

1. **Defining safeguarding in the research context was initially challenging** – The relatively new definition of the term safeguarding and its use almost exclusively in the UK until recently, as well as the broadening of the term in the international development research context to include bullying and other forms of violence and harassment, posed a challenge when engaging actors new to international development research and stakeholders in developing countries. Research funders collaborated with donors, NGOs and the private sector to clarify the scope of safeguarding in research, which has been defined as: “Any sexual exploitation, abuse or harassment of research participants, communities and research staff, plus any broader forms of violence, exploitation and abuse relevant to research, such as bullying, psychological abuse and physical violence.”
2. **It is necessary to build institutional capacity on safeguarding in the international development research sector** – Bridging different safeguarding contexts in research presented challenges, particularly for UK research funders, Higher Education Institutes (HEIs) and other organisations for which international or Official Development Assistance (ODA) research is not a core activity. Many HEIs’ safeguarding policies were not prepared with research in mind and focus primarily on student welfare and visitors to campus. The principles and good practice guidance – which will draw on consultations, existing guidance (e.g. [IASC](#) guidance and the [new DAC instrument](#)) and first-hand experience of UK and developing country stakeholders – will help build safeguarding capacity of institutions that are less familiar with international development research.
3. **There is a lack of evidence on effectiveness of safeguarding measures** – While the evidence review identified many challenges linked to safeguarding people against harm, it found that evidence related to effectiveness of safeguarding policies and procedures in research is limited. The evidence review makes suggestions on how to conduct meaningful evaluations of changes to safeguarding practices. Consultations with stakeholders will provide further clarity on to how to effectively implement best practice guidance and evaluate impact.

Case Study

This case study is drawn from an interview conducted for the evidence review, research funders’ main output to date related to the commitments. It fed into the draft principles and good practice guidance, which – when finalised – will influence safeguarding practices on the ground.

In one research project discussed as part of the review, fieldworkers encountered emotionally challenging situations that exposed them to death, grief and violence. In some instances where fieldworkers suspected abuse, participants initially denied abuse was happening but would later call and confirm the fieldworkers’ suspicions. Some fieldworkers were asked to accompany participants to the police, attend court proceedings and support victims. The fieldworkers said these experiences highlighted the need for continued research involvement in communities and the value of building into the project

relevant training, review of experiences and referrals (though researchers must recognise that their opportunity to find out what happened post-referral may be limited).

In response, the draft safeguarding principles and good practice guidance emphasise the importance of ongoing training and capacity building for researchers in the field (who may be obliged to deal with safeguarding concerns or reports) and recommend provision of support for fieldworkers who are confronted with emotionally challenging safeguarding situations, including with regard to sexual exploitation, abuse and harassment.

Data

Until the publication of the evidence review, safeguarding in international development research was not clearly defined. As a result, there is not currently a harmonised approach or standardised methodology for collecting information about safeguarding breaches across the sector, nor is there a central repository across the sector for storing information. However, some research funders do collect safeguarding case data for the research projects they fund.

The evidence review recommends a number of approaches to evaluate the impact of changes in safeguarding practices in the international development research sector, such as measuring: 1) design and adoption of policies, 2) changes in knowledge and attitudes of researchers, and 3) effects on the conduct of research (including reporting and qualitative feedback). These recommendations recognise that collecting data about the number of reported cases is one in a suite of approaches that could be used to evaluate change. As such, these recommendations could support the sector to effectively evaluate change.

7. CDC Group

Introduction

On 18 October 2018, CDC Group, the UK development finance institution (DFI), made a set of commitments to tackle sexual exploitation, abuse and harassment (SEAH) in the development finance sector. The commitments focused on CDC's operations and the due diligence and monitoring processes it undertakes when making investments in the private sector in Africa and South Asia. Over the past year, CDC has continued to strengthen its safeguarding controls and measures. CDC's board monitors and receives progress reports on the work being carried out to implement the commitments. Below is a summary of progress.

CDC: commitments to tackle sexual exploitation and abuse and sexual harassment in the international aid sector

Commitments to strengthen safeguarding measures against sexual exploitation, abuse and sexual harassment in the development finance sector

<https://www.gov.uk/government/publications/cdc-commitments-to-tackle-sexual-exploitation-and-abuse-and-sexual-harassment-in-the-international-aid-sector>

Progress

1. **Safeguarding board member** – CDC's board appointed a non-executive board member, Ms Dolika Banda, to lead and oversee CDC's work on safeguarding. Ms Banda has over 25 years' experience in international finance and banking across the globe, particularly emerging markets.
2. **Developing safeguarding Good Practice Note** – CDC's Environmental and Social Responsibility team is working with the International Finance Corporation (IFC) and the European Bank for Reconstruction and Development (EBRD) to develop a safeguarding Good Practice Note to promote better practices in CDC's markets and geographies. The guidance, which focuses on gender-based violence and harassment, is scheduled for completion in early 2020. In parallel, training and guidance is being developed for use by staff in each institution, to help identify safeguarding and harassment risks in potential and portfolio investments. The Good Practice Note will be relevant to others, particularly DFIs and the financial services industry.
3. **Improving gender balance of senior management** – CDC committed to improving the gender balance within its senior management. This is important because SEAH arises from power imbalances. As of September 2019, 27 per cent of director roles and above were filled by women. By 2023, CDC aims to increase the percentage of women in senior roles to 34-36 per cent. Gender balance has been included in CDC's corporate objectives, and in February 2019 CDC committed to [Her Majesty's Treasury's Women in Finance Charter](#), which requires actions to improve gender diversity.
4. **Job quality team and strategy** – CDC has created a Job Quality team and developed a job quality strategy to improve working conditions in its portfolio of investee companies. One of

the four pillars of this strategy is Worker Voice and Representation. This focuses on improving communication channels between employees and management, including but not limited to grievance mechanisms, employee representatives, unions, HR teams and employee surveys. It aims to enable people to speak up when an issue arises – including SEAH – and trust that complaints will be dealt with appropriately. The strategy will explore ways to improve protection for informal or subcontracted workers, who often do not have access to the redress or communications channels available to employees.

Challenges and Lessons

1. **Understanding the way safeguarding risks manifest in different sectors is critical to developing strategies to mitigate those risks** – DFIs invest in a range of sectors, including agriculture, construction, manufacturing, education, health and finance. Different types of investment involve different safeguarding risks, and mitigation measures must be tailored to the context. This was highlighted by a case that occurred in the education sector and led to a specific piece of research being undertaken by a child safeguarding NGO (see Case Study below).
2. **Advancing women’s economic empowerment is central to addressing power imbalances** – DFIs are increasingly focusing attention on women’s economic empowerment in the countries where they work. This is important for preventing SEAH as power imbalances are intrinsically linked to safeguarding. There is limited understanding of gender diversity and inclusion in many markets where DFIs invest. As part of CDC’s gender strategy, it is working with investment client companies to develop gender action plans, many of which focus on increasing diversity, inclusion and leadership of women in the workforce. CDC will use these plans to develop ‘how to’ guidance for investment clients. CDC is also supporting efforts across the DFI community to build the field of gender-smart investing, with a focus on aligning approaches for collecting [gender disaggregated data](#).

Case Study

Following a safeguarding incident at an educational centre investment, CDC commissioned an NGO specialising in child safeguarding to undertake a review of safeguarding policies and procedures across a selection of its education investments. This research enabled the NGO to produce guidance on developing appropriate codes of conduct and grievance mechanisms for the education sector.

This guidance is now being used to inform CDC’s due diligence of projects within that sector, to ensure that beneficiaries of these projects are better protected, and will be incorporated into the safeguarding Good Practice Note being developed with IFC and EBRD.

Data

The number of safeguarding cases reported to CDC in 2018-19 remained at a similar level to the previous year. CDC does not publish data on safeguarding cases. Safeguarding issues can be raised in multiple ways, including through CDC’s whistleblowing and complaints channels. All safeguarding issues, including their management and any ultimate resolution, are reported to senior management and CDC’s board of directors.

8. Gavi and Global Fund

Introduction

Gavi, the Vaccine Alliance, and the Global Fund to Fight Aids, Tuberculosis and Malaria (Global Fund) are Geneva-based¹³ financing agencies that receive funding from public and private sources. They are significant donors to health programmes in developing countries. On 18 October 2018, the two institutions signed up to joint commitments to prevent and respond to sexual exploitation, abuse and sexual harassment (SEAH) in their own and their partners' operations. They committed to communicate regularly on this issue, share lessons and meet within 12 months to assess progress.

Gavi and Global Fund: commitments to tackle sexual exploitation and abuse and sexual harassment in the international aid sector

Commitments made by Gavi, the Vaccine Alliance, and the Global Fund to fight Aids, Tuberculosis and Malaria (Global Fund) to address sexual exploitation and abuse and sexual harassment

<https://www.gov.uk/government/publications/gavi-and-global-fund-commitments-to-tackle-sexual-exploitation-and-abuse-and-sexual-harassment-in-the-international-aid-sector>

Progress

1. **Tone from the top** – Both Gavi and Global Fund's leadership have demonstrated that they view safeguarding against SEAH as a priority. The Global Fund has appointed its Chief of Staff as safeguarding champion, working closely with the Head of Human Resources and the Ethics Officer. The Executive Director and Chief of Staff have disseminated messages on bullying, harassment, sexual harassment and abuse of power to all staff. Gavi has named its deputy CEO as senior-level champion to lead Gavi's work on preventing SEAH. In 2018 and 2019, Gavi management delivered regular communications to staff about safeguarding and maintaining a respectful workplace at staff meetings and events, leadership retreats and governance meetings. A section on Gavi's approach to safeguarding was included in its [2018 Annual Progress Report](#).
2. **Policies and staff training** – The Global Fund has updated its Employee Handbook with a section on bullying, harassment, sexual harassment and abuse of power, and included explicit references to safeguarding in its staff Code of Conduct. It is updating codes of conduct for suppliers and implementers with language adapted from the recently published [DAC Recommendation](#) on Ending Sexual Exploitation, Abuse and Harassment in Development Co-operation and Humanitarian Assistance. Gavi has included a prohibition on sexual exploitation and abuse in its staff Code of Conduct and introduced provisions on expected behaviour, safeguarding and reporting standards in agreements with contractors, grantees and suppliers. Both Gavi and Global Fund have rolled out mandatory safeguarding training to all staff.

¹³ Gavi also has a small office in Washington, D.C.

3. **Recruitment practices** – The Global Fund’s due diligence process for recruitment has been strengthened. Explicit questions on previous allegations of bullying, harassment, sexual harassment and abuse of power are now included in all reference checks. Gavi has added a specific question to its reference check form to assess whether candidates have demonstrated in their previous workplaces the high standards of integrity and respect expected by Gavi, including zero tolerance towards SEAH.

Challenges and Lessons

1. **The term ‘sexual exploitation and abuse’ is sensitive in contexts in which the Global Fund operates** – This terminology can be perceived as undermining the rights of sex workers, a key population that is highly vulnerable to HIV. As a result, the Global Fund has adopted ‘bullying, harassment, sexual harassment and abuse of power’ to define its work in this area.
2. **Partner governments, particularly in low- and middle-income countries, face capacity challenges around investigations and follow up to sexual harassment allegations.** The Global Fund’s independent Inspector General and Gavi’s Managing Director of Audit and Investigations can advise on investigations and both organisations have whistleblower hotlines as a channel for reporting. However, ultimate accountability for law enforcement lies within the governments themselves.
3. **Gavi works closely with countries and supranational agencies, over which it has no control in relation to SEAH** – As an Alliance, most of Gavi’s funding is used to pay for commodities and it has a relatively low number of staff. As a result, Gavi relies heavily on implementing partners such as WHO and UNICEF. These agencies manage SEAH issues and reporting independently of Gavi. Gavi includes clauses on SEAH in contracts with non-UN partners. Gavi does not include an explicit prohibition on SEAH in agreements with governments but requires them to comply with all applicable laws and regulations.

Case Study

Recognising the need to ensure that all staff are aware of, and understand, its updated Code of Conduct and expectations around employees’ behaviour in the workplace – including zero tolerance to sexual exploitation, abuse and sexual harassment – the Global Fund carried out Code of Conduct training and Dignity in the Workplace training in 2018.

After this training, and additional communications from management to staff about SEAH, the Global Fund has observed an increase in the number of staff members approaching human resources and its Ethics Office to raise questions and concerns about behaviours in the workplace, including those linked to SEAH. These queries have related to employees’ own experiences and things they have observed in partners funded by Global Fund. Another encouraging sign is that many of these reports have related to lower-level concerns or breaches, which previously would most likely have gone unreported. This indicates an improvement in organisational culture, as staff feel safe to challenge and raise issues ‘just in case’.

In a small number of these cases, further action has been taken, including investigations and disciplinary action.

Data

The Global Fund reported a small increase in the number of SEAH allegations it received in 2018-19, compared with a year earlier, indicating an increased level of awareness at both staff and implementing partner level. In July 2019, the Global Fund notified its Ethics and Governance Committee on the number of allegations received, the actions taken and the outcomes of such actions. Such reports will happen at least annually, and more frequently if required.

Gavi reported no change to the number of SEAH allegations it received since last year. Gavi has updated the web page for its ethics hotline to clarify that this also covers issues of sexual harassment and abuse. The HR Director will share actions taken and Gavi's progress to date against the October 2018 commitments with the Governance Committee and at a closed session with the Board in late 2019.