

Cross-Sector Progress Report on Safeguarding Against Sexual Exploitation, Abuse and Sexual Harassment (SEAH) 2019-2020

A summary of work between October 2019 and October 2020 by the groups and organisations that made commitments at the October 2018 London Safeguarding Summit, and others working to align their safeguarding work with the long-term shifts identified at the Summit



OCTOBER 2020

Contents

Introduction and Summary	4
Highlights and Trends	6
1. Donors	8
2. United Nations	11
3. International Financial Institutions	14
4. UK NGOs	17
5. UK Private Sector Suppliers	20
6. Research Funders	23
7. CDC Group	26
8. Gavi and Global Fund	29
9. Red Cross Red Crescent	32

Introduction and Summary

On 18 October 2018, the UK 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 percent of global Official Development Assistance (ODA), the United Nations (UN), international financial institutions (IFIs), UK non-governmental organisations (NGOs),¹ UK private sector aid organisations, research funders, CDC Group, and Gavi and the Global Fund – who came together and made commitments for root-to-branch change in the way the aid sector operates.

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

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.

The Foreign, Commonwealth and Development Office (FCDO) recognises that safeguarding against SEAH is a long-term agenda, requiring leadership and culture change at all levels. Since August 2018, the UK² has been working with a Cross-Sector Safeguarding Steering Group (CSSG), to ensure continued momentum on safeguarding.

The CSSG includes representatives from all eight groups or organisations that made commitments at the London summit in 2018, alongside independent voices. It is an informal and safe space for organisations to report back on progress, share best practice, opportunities and challenges, and increase coherence across the sector.

This year, the CSSG welcomed two new members – the CHS Alliance, which represents one of the two minimum standards that underpin the London summit commitments,³ and the British Red Cross, which in December 2019 produced a [pledge to prevent and respond to SEAH in humanitarian action](#) for the Red Cross Red Crescent Movement, aligned with the four long-term changes detailed above.

While individual organisations are accountable for implementing specific summit commitments, safeguarding against SEAH in the aid sector is a shared responsibility. In

¹ UK-based NGOs are represented by Bond on the Cross-Sector Safeguarding Steering Group (CSSG). The International Council of Voluntary Agencies (ICVA) is also a member of the CSSG, representing the international NGO sector.

² This work was initiated by the Department for International Development (DFID) in 2018. On 2 September 2020, DFID and the Foreign & Commonwealth Office merged to become the Foreign, Commonwealth & Development Office (FCDO).

³ The CHS Alliance represents the [Core Humanitarian Standard](#). The other minimum standard which underpins the London summit commitments, the [Interagency Standing Committee \(IASC\) Minimum Operating Standards for PSEA](#), is represented in this group by UN agencies.

October 2019, the eight groups or organisations that made commitments at the London Summit reported back on progress. This year, the same groups and organisations – as well as the Red Cross Red Crescent Movement – have provided an update on their activities over the past 12 months to further drive up safeguarding standards. Each group or organisation featured in this report is reporting back on their own commitments.

Two years on from the October 2018 summit, considerable progress has been made. The UK-funded Safeguarding Resource & Support Hub is now live, providing guidance, tools, support and analysis for aid organisations. Initiatives to prevent perpetrators of SEAH from moving around the sector – including a pilot project with INTERPOL and an Aid Worker Registration Scheme – are being developed in consultation with NGOs and others. Projects are also in the pipeline to improve aid organisations' safeguarding culture, and to support victims/survivors of SEAH and whistle-blowers.

Since March 2020, the COVID-19 pandemic has posed a major challenge for the aid sector, leading to delays in some safeguarding initiatives and forcing organisations to rapidly adapt. Evidence shows that the risk of SEAH increases during emergencies. At the same time, restrictions on movement make it harder to report concerns, engage with beneficiaries and communities, investigate cases, and provide support to victims and survivors. This report includes examples of approaches aid organisations are taking to adapt their safeguarding systems to COVID-19.

Safeguarding against SEAH is a long-term challenge. It will take time for many of the initiatives highlighted in this report to translate into widespread, tangible impact on the ground. Sustained efforts and strong leadership are required to ensure that safeguarding against SEAH remains a priority and that victims and survivors are supported.

The CSSG recognises the importance of using its shared learning and expertise to influence partners and others in the sector to improve their safeguarding capacity, ensuring the impact of its activities is felt more widely. Sharing progress, lessons and challenges through this report is one method of doing that. The CSSG will continue to meet quarterly over the next 12 months, to ensure continued focus across the aid sector on keeping the people we work with safe from harm.

Highlights and Trends

- 1. Good progress has been made on initiatives to identify perpetrators of SEAH.** NGOs, private sector organisations and the Red Cross Red Crescent Movement are part of a working group for Project Soteria, a UK-funded pilot project with INTERPOL to strengthen vetting of potential aid workers. Fifty-eight organisations and affiliates have signed up to the [Misconduct Disclosure Scheme \(MDS\)](#), run by the Steering Committee for Humanitarian Response (SCHR). In 2019, the MDS received over 2,900 requests for misconduct data, of which 2,100 received responses, and prevented 36 people from being hired in the sector. The MDS will soon be open to donors, UN and private sector aid organisations. NGOs and the UK are developing an Aid Worker Registration Scheme to verify aid workers' identities and work history. Over the past year, they mapped ID-style systems, completed a [legal review](#) and consulted the sector. Individual organisations have also strengthened recruitment practices. Meanwhile, the UN [Clear Check](#) tool is helping to prevent perpetrators of SEAH from being re-employed in the UN system.
- 2. Survivor-centred approaches and support to victims/survivors are being prioritised.** Several donors, including the UK, have developed survivor-centred policies or programmes in 2020. The UN is finalising a Statement of Victims' Rights, which is due to be adopted by the High-level Steering Group in December. The Office of the Victims' Rights Advocate has also [mapped support services](#) available to victims of sexual exploitation and abuse in 13 countries. However, providing survivor-centred responses to SEAH, including quality support services, remains a challenge, particularly in the context of COVID-19. Further work will be needed by donors and their partners to ensure victims/survivors get the support they require.
- 3. All stakeholder groups have strengthened their safeguarding policies and practices over the past year.** International Financial Institutions (IFIs) have introduced new policies, improved complaints mechanisms and appointed specific individuals to oversee safeguarding controls. CDC developed and implemented a survivor-centred incident management procedure. NGOs, private sector aid organisations, research funders, and Gavi and the Global Fund have all strengthened safeguarding or related policies and provided training to staff and partners on these. Many of Bond's NGO members report seeing evidence that improved practices have benefited communities and victims/survivors of SEAH.
- 4. Tools and guidance are supporting partners to achieve higher safeguarding standards.** This year, the UN produced a [tool](#) to assess partners' safeguarding capacity. IFIs and CDC published [good practice guidance for the private sector](#) on addressing gender-based violence and harassment (GBVH). The International Federation of Red Cross and Red Crescent Societies (IFRC), along with the British and Canadian Red Cross, developed an [Operational Manual](#) for the Red Cross Red Crescent Movement. Research funders published [guidance on safeguarding in international development research](#). Training and awareness sessions have been held with partners to increase uptake of these various resources.
- 5. Donors and others are aligning approaches with international standards.** Fifteen donors are aligning language on SEAH for funding agreements with

multilaterals, committing partners to adhere to minimum standards. Donors are also making progress on implementing the [DAC Recommendation on Ending SEAH](#). IFIs are planning an event in late 2020 to facilitate greater alignment. Gavi and Global Fund are working to align their policies with global minimum standards.

6. **Culture change and leadership from the top remains essential to address the power imbalances that lead to SEAH.** The UK is funding Bond, in consultation with NGOs, to develop a digital tool to help aid organisations improve their safeguarding culture. Donors implementing the [DAC Recommendation](#) are taking actions related to change and leadership. Meanwhile, the UN, IFIs and private sector aid organisations have launched campaigns and activities during the past year to encourage a ‘speak-up’ culture. Culture change is a long-term process, which will require sustained effort and investment over many years.
7. **COVID-19 poses huge challenges for the aid sector, as well as opportunities to learn and improve.** All stakeholder groups recognise that COVID-19 and its associated emergency responses increase the risk of SEAH, while travel restrictions make it harder to report concerns, investigate cases and support victims/survivors. Organisations have responded by adapting programmes, using technology such as mobile phones, TV/radio and webinars to communicate with staff and beneficiaries, and producing guidance. Many organisations have also taken steps to mitigate increased risks of domestic violence (including SEAH) for staff working from home. As the pandemic evolves, the aid sector’s commitment to protect people from SEAH must not just be maintained but also scaled up.
8. **Financial and human resources to prevent and respond to SEAH remain a challenge.** The UN notes that resources for protecting people from sexual exploitation and abuse remain scarce across the UN Secretariat, particularly with relation to assisting victims and survivors. NGOs and private sector aid organisations highlight the need for additional resources, particularly because embedding safeguarding into organisations requires continuous, rather than one-off, investment. COVID-19 has exacerbated resource challenges, prompting an urgent shift in priorities and uncertainty around funding for many aid organisations.
9. **Safeguarding approaches must be tailored to specific contexts.** CDC and NGOs, among others, have made efforts to map specific safeguarding risks and available support services in the contexts in which they work, in order to tailor safeguarding approaches and accountability mechanisms. Reporting mechanisms, in particular, need to be adapted to local contexts to ensure they are accessible and appropriate. This is a challenge with no quick fixes, and one that donors, NGOs, private sector aid organisations and others are working hard to address.
10. **Data on SEAH remains a challenge.** There is no standardised approach for aid organisations to collect and share data on SEAH and definitions or reporting parameters vary between organisations. The UN systematically collects and reports data on sexual exploitation and abuse. IFIs report data on ethics and integrity issues (including SEAH) to their boards and most publish these figures. The UK publishes data on SEAH in annual reports, while the Netherlands has also provided data for this report. The FCDO will consult the sector on how to develop a standardised framework and protocols for collecting and reporting SEAH data. The aim is to improve data collection to identify lessons and trends, leading to improved policies, programmes and support for survivors.

1. Donors

Introduction

In October 2018, 22 donors signed up to commitments to prevent sexual exploitation, abuse and sexual harassment (SEAH) in the aid sector and to respond better when it does occur. Donors agreed to implement the commitments according to their own priorities and systems. They issued a donor progress report in October 2019. In 2020, the European Union also signed the commitment document, bringing the number to 23. Over the past year, donors have continued to engage on SEAH through quarterly meetings, informal exchanges and through the Development Assistance Committee (DAC) process.

Progress

1. **Implementing the DAC Recommendation on Ending SEAH in Development Co-operation and Humanitarian Assistance** – The Organisation for Economic Cooperation and Development (OECD)'s Development Assistance Committee (DAC) consists of 30 major donors providing combined aid of approximately \$150 billion in 2019.⁴ In January 2020, an Action Plan and Communications Strategy were developed with DAC members and the DAC Reference Group on Ending SEAH to support implementation of the Recommendation adopted in July 2019. The UK, Ireland and Japan have reported on progress through DAC peer reviews, which are one of several ways to track members' progress. Germany is currently undergoing peer review. The DAC has approved the Programme of Work and Budget for 2021-2022. This includes implementation of the DAC Recommendation as a priority and ensures that the work of the DAC Reference Group on Ending SEAH, under the guidance of the DAC Network on Gender Equality (GenderNet), is resourced and integrated into the DAC's plans for the next two years.
2. **Aligning donor language on SEAH for funding agreements with multilateral organisations** - The Netherlands led 15 donors⁵ in aligning language on SEAH for funding agreements with multilaterals. The language commits partners to: take a zero tolerance for inaction on tackling SEAH; apply the IASC Six Core Principles Relating to Sexual Exploitation and Abuse; adhere to the Inter-Agency Standing Committee (IASC) Minimum Operating Standards on Preventing Sexual Exploitation and Abuse (PSEA) and/or the Core Humanitarian Standard (CHS); take a survivor-centred approach; and report any SEAH incidents to donors. The language was presented through a joint letter to the UN Chief Executives Board, noting the intention to apply it to future funding agreements. The 15 donors are individually starting to integrate the shared language and principles into their funding agreements. This is expected to provide much-needed consistency across the sector, deliver efficiencies and clarify expectations.

⁴ 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 SEAH in development cooperation and drive donor accountability in meeting them.

⁵ Australia, Belgium, Denmark, Italy, France, Germany, Luxembourg, Netherlands, New Zealand, Norway, Portugal, Spain, Switzerland, UK, USA

3. **Increased adherence to international standards** – Alignment of donor language for funding agreements with multilaterals will increase adherence to the minimum standards that donors committed to adopt and require of their partners.⁶ The DAC Recommendation aligns with these standards. Australia, Denmark, Germany, Luxembourg, Sweden, Switzerland and the UK continue to support the CHS Alliance and the Humanitarian Quality Assurance Initiative (HQAI) to strengthen the Core Humanitarian Standard⁷ and its [independent verification mechanisms](#). These donors are exploring the potential to use CHS certification by HQAI to better align their due diligence processes, increasing efficiency for donors and partners.

Challenges and Lessons

1. **COVID-19 highlights the need to be flexible and adapt to changing circumstances** – Donors have seen their work severely impacted by COVID-19. Most have drawn down staff from the field, making it harder to oversee partners and programmes; engage beneficiaries and communities; and implement SEAH controls, investigate cases or support victims/survivors if an incident does occur. The need for remote monitoring mechanisms has become evident. Meanwhile, many national or international events where discussions on SEAH would have featured have been postponed or cancelled. Donors have responded by adjusting programmes to the COVID-19 context and developing tailored guidance for programmes and partners, with reminders to pay more attention to PSEA as vulnerabilities increase during crises. Donors collectively asked the UN to emphasise the increased risks of SEAH during the pandemic, including through joint statements at Executive Board meetings.
2. **Culture change across the aid sector is a long-term commitment, requiring multiple approaches, strong leadership and continued oversight** – The DAC Recommendation will support DAC member states to meet requirements under its six pillars, the first of which focuses on change and leadership. Continued international coordination (a central tenet of the Recommendation) is needed to strengthen the safeguarding culture of aid organisations and the overall sector. The political will demonstrated across the aid sector (by donors and others) in recent years must be maintained. Donors that signed up to the 2018 commitments have individually developed training and awareness initiatives to boost understanding and capability within their organisations to prevent and respond to SEAH.
3. **Developing survivor-centred approaches and providing SEAH-related services to people in fragile or remote environments must remain a priority** – These are challenges with no quick fixes. While it may be relatively simple to design mechanisms for confidential reporting and investigations, implementation relies on political will, funding for services, staff training (at local and international levels), survivor and community participation, access to appropriate reporting channels and available technology. Donors are piloting approaches to tackle this

⁶ These are the [Core Humanitarian Standard](#) and the [Interagency Standing Committee \(IASC\) Minimum Operating Standards for PSEA](#).

⁷ The CHS Alliance is updating the PSEA Index, a core part of the standard, and recently updated its [Verification Scheme](#)

area of work. Australia, Ireland, Canada, Luxembourg, New Zealand, Switzerland, USAID and the UK have launched or are due to launch survivor-centred policies, programmes, strategies or guidance in 2020. Donors have also funded PSEA coordinators in humanitarian situations and ensured PSEA considerations are at the heart of humanitarian responses. The DAC Secretariat will develop guidance on survivor-centred approaches under the action plan for the Recommendation.

Case Study

In July 2020, donors agreed to set up a Donor Safeguarding Investigations Group for donors that signed the London commitments and/or are members of the DAC. This informal group will meet quarterly, bringing together individuals who are responsible for overseeing responses to safeguarding incidents within donor organisations. It will enable donors to learn from each other by sharing best practice and experiences of handling safeguarding cases and managing investigations. While at an early stage, the group has received expressions of interest to participate from eight donors so far. The group plans to meet for the first time in October 2020.

The sharing of best practice among donors will contribute to the long-term shift from the 2018 summit on *ensuring support for survivors, victims and whistle-blowers, enhancing accountability and transparency, strengthening reporting and tackling impunity*. Donors will use the group to strengthen their systems and investigative capacity, improve their safeguarding standards and ensure their approaches to safeguarding are victim and survivor-centred.

Reporting of Cases

Data on number and types of SEAH cases reported remains a challenge. The UK has published data on SEAH reports in annual reports since 2018. The Netherlands, which represents donors alongside the UK on the CSSG, has also provided data for this report.

UK

The number of internal safeguarding cases reported to the Department for International Development (DFID)⁸ rose from less than five in 2018-19, to 26 in 2019-20. This followed an internal communications campaign encouraging staff to report concerns. DFID concluded 14 such cases in 2019-20. In 11 cases, the allegations were upheld. All cases where allegations against a staff member were upheld resulted in disciplinary action being taken, up to and including dismissal. The number of safeguarding concerns reported by DFID's implementing partners also increased, from 260 in 2018-19 to 452 in 2019-20. The most common types of incident reported in 2019-20 were SEAH (60%), discrimination and harassment (20%), physical abuse (10%) and child exploitation (10%). The most common outcomes were disciplinary action or dismissals (34%) and other partner action (24%).

Netherlands

In 2019, the Dutch Ministry of Foreign Affairs received 31 reports of SEAH at partner organisations. Of these, 19 cases have been concluded and 12 are still open, with partner organisations following up. In none of these cases was there reason for the Ministry to implement financial sanctions.

⁸ On September 2, DFID and the Foreign & Commonwealth Office (FCO) joined to become the FCDO. 'Internal' SEAH cases are those where the survivor or subject of complaint was a DFID staff member.

2. United Nations

Introduction

The Secretary-General's strategy to eradicate sexual exploitation and abuse (SEA) is outlined in his annual reports.⁹ In October 2018, members of the UN Secretary-General's Circle of Leadership¹⁰ presented a [collective statement](#), endorsed by 25 UN entities, to reaffirm their commitment to combating SEA across the UN system. Circle of Leadership representatives met in July 2020 to discuss the UN response to SEA, including risk mitigation measures during the COVID-19 pandemic. The [UN factsheet](#) is updated quarterly, summarising SEA initiatives, progress made and timescales for future action. The Office of the Victims' Rights Advocate (OVRA), in collaboration with the Office of the Special Coordinator on improving the UN response to sexual exploitation and abuse (OSC) and some UN member states, plans to hold a virtual event in late 2020 to discuss progress and challenges during the three years of implementing the Secretary-General's strategy. In September 2019, the Secretary-General published a bulletin on [Addressing discrimination, harassment, including sexual harassment, and abuse of authority](#).

Progress

1. **Statement of Victims' Rights and support for victims/survivors of SEA** – The UN puts victims' dignity and rights at the centre of its prevention and response efforts. The UN is close to finalising a Statement of Victims' Rights to ensure aid recipients are clear about their rights and what is acceptable behaviour from UN personnel, as well as complementary guidelines for UN personnel. This process is being led by the Office of the Victims' Rights Advocate, and the Statement is scheduled to be adopted by the High-level Steering Group in December 2020. In December 2019, the UN published a [Protocol on the Provision of Assistance to Victims of Sexual Exploitation and Abuse](#), which outlines common norms and standards to strengthen a coordinated, system-wide approach to providing assistance, prioritising victims' rights and dignity. OVRA has also completed a [pilot mapping of services available to victims of SEA](#) in 13 countries in which the UN operates. In June, OVRA organised a technical consultation among UN entities on the challenges and gaps in legal aid for victims of SEA, in collaboration with UNICEF and OHCHR. Follow-up on the recommendations is expected in 2020-21.
2. **PSEA corporate action plans** – The number of PSEA actions plans submitted by UN entities increased to 200 in 2020 from 50 in 2019. This was largely due to strong engagement across UN entities by the UN's Department of Management, Strategy, Policy and Compliance, and action plans being submitted by Resident Coordinators on behalf of UN Country Teams for the first time. The action plans are part of an accountability framework instituted by the Secretary-General. Mandatory action plans are to be submitted by all UN entities on measures taken

⁹ A/74/705, A/73/744, A/72/751 and A/71/818. The strategy prioritises the rights and dignity of victims, ending impunity, increasing partnership with Member States, building a network of support from civil society and improving strategic communications for education and transparency.

¹⁰ In October 2018, the Circle of Leadership on the prevention of and response to sexual exploitation and abuse in United Nations operations comprised 49 member states and 19 UN entities.

to prevent and respond to SEA, including risk mitigation; community engagement; minimum safeguarding standards; and promoting a victim-centred approach.

3. **Capacity building for partner organisations** – In August 2020, the UN published [a tool to assess implementing partners' capacity on preventing sexual exploitation and abuse \(PSEA\)](#). This gives UN entities oversight of partners' organisational capacities on PSEA, in line with the minimum standards of the [UN's Protocol on Allegations of SEA Involving Implementing Partners](#). The Inter-Agency Standing Committee (IASC) also produced an interactive [learning package on protection from sexual misconduct for UN partner organisations](#), available in four languages.
4. **UN system-wide action to prevent sexual harassment** - The [Chief Executive Board Task Force](#) on Addressing Sexual Harassment is finalising a Manual for the Investigation of Sexual Harassment, which will be shared with investigators across the UN by the end of 2020. The [Code of Conduct To Prevent Harassment, Including Sexual Harassment, at UN System Events](#) is increasingly being used, most notably at the [43rd and 44th sessions](#) of the Human Rights Council. Results of a survey about the [UN System Model Policy on Sexual Harassment](#) in February 2020 showed a clear effort within all organisations to translate this work into practice. Most respondents said they had issued a new policy aligned with the Model Policy or that they were planning to issue one within a year. Meanwhile, to support implementation of the Secretary-General's bulletin on addressing discrimination and harassment, the UN Secretariat produced a '[United to Respect](#)' [toolkit](#) and dialogue workshops focused on promoting dignity and respect in the workplace. [Clear Check](#), a screening tool employed by 25 UN entities to ensure UN personnel with established allegations related to SEA or sexual harassment are not re-employed within the UN system has increased its number of individuals listed to 280, including 78 related to sexual harassment and 202 related to SEA.

Challenges and Lessons

1. **COVID-19 has made it more challenging to support victims/survivors of SEA** – Assisting victims and survivors of SEA perpetrated by individuals associated with the UN has become more challenging as a result of physical distancing and restrictions on movement related to the pandemic. Field Victims' Rights Advocates and Senior Victims' Rights Officers in the Central African Republic, Democratic Republic of the Congo, Haiti and South Sudan remain committed to providing assistance and have maintained communications with victims and survivors on a regular basis through mobile phones. Field Victims' Rights Advocates have been liaising with support service providers throughout the pandemic, to ensure that assistance continues. They have also worked to strengthen complaints mechanisms to make them known and accessible to communities.
2. **Dearth of dedicated services for victims/survivors** – In many locations in which UN agencies operate, there are gaps in services available for victims/survivors of gender-based violence, including SEA. While four Field Victims' Rights Advocates are in place (in the four locations mentioned above), most countries do not have a dedicated UN focal point focused on ensuring that a victim-centred approach is used when handling SEA cases, from the moment an SEA allegation is reported to case closure, and that victims receive the assistance and support they need.

3. **Financial and staff resources for protecting people from SEA, particularly for assisting victims/survivors, remain scarce across the UN Secretariat** – The UN sees the need to go further, for instance by establishing a one-stop point to access funding for SEA interventions, including on an emergency basis, which could be made accessible systemwide.

Case Study

As seen in previous public health emergencies, when humanitarian responses scale up the risk of SEA increases. The Inter-Agency Standing Committee (IASC), as the coordinating body for strengthening coherent humanitarian action, responded to challenges posed by COVID-19, by issuing an [Interim Technical Note on Protection from Sexual Exploitation and Abuse \(PSEA\) during COVID-19 Response](#) in March. An accompanying checklist was developed for project managers in the field. Joint communications were issued from relevant UN agencies on: heightened risks of misconduct during the pandemic and the importance of implementing risk mitigation measures; providing assistance and support to victims of SEA during the pandemic; and messages on SEA to all UN Humanitarian Coordinators.

With the support of UNICEF, an IASC PSEA Field Support Team was established within the IASC Secretariat to support Humanitarian Coordinators and country teams to accelerate the prevention of SEA. The PSEA Field Support Team is comprised of technical experts from IOM, InterAction, Oxfam, UNFPA, UNHCR, UNICEF, UNDP and WFP. An [IASC PSEA global site](#) was established to support Humanitarian Coordinators and country teams, including a dashboard to track progress.

Reporting of Cases

The UN [publishes](#) data on sexual exploitation and abuse (SEA) 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, allegations increased to 80 in 2019 compared with 56 in 2018.
- The number of allegations received by other UN entities increased to 102 in 2019 compared with 94 in 2018.
- Allegations involving non-UN personnel working for UN implementing partners increased to 173 in 2019 compared with 114 in 2018.

The Chief Executive Board (CEB) Task Force on Addressing Sexual Harassment carried out its annual survey of UN entities on Reporting of Sexual Harassment for the year 2019.

Twenty-eight UN entities participated in the survey, which sought quantitative data on the scope of reporting mechanisms; the personnel eligible to report or be the subject of formal reports; the identity of affected individuals and alleged offenders; the prevailing forms of sexual harassment being reported; and the outcome of cases, among others.

The overall trend shows that from 2016 to 2018, sexual harassment complaints rose steadily before stabilising in 2019. Sexual harassment clearly remains a gender issue and one related to power differentials.

3. International Financial Institutions

Introduction

In 2018, 10 International Financial Institutions (IFIs)¹¹ 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 agreed to maintain and advance standards to prevent SEAH through seven common principles.¹² Recognising that each IFI differs in its policies and procedures, below is a snapshot of IFIs' safeguarding activities over the last year.

Progress

1. **Strengthening safeguarding policies and mechanisms** – All of the IFIs that signed the commitment statement have taken steps to strengthen their SEAH policies and procedures for handling cases. Several IFIs have introduced new Codes of Ethics, Whistleblowing Policies or independent complaints mechanisms – which form part of an ecosystem of institutional standards aiming to prevent SEAH and other forms of misconduct – and developed training on these for staff. IFIs are learning from their own and others' experience and addressing gaps in their safeguarding mechanisms, including by: strengthening independent professional conduct offices; providing more and better-tailored options for people to submit complaints and concerns; revising policies on harassment, including sexual harassment; and better defining sexual harassment in codes of conduct in line with international best practice. Some IFIs have introduced specific coordinators, teams or senior officers to implement and monitor these measures.
2. **Good Practice Guidance on Gender-Based Violence and Harassment (GBVH)**¹³ – The European Bank for Reconstruction and Development (EBRD) and the International Finance Corporation (IFC) worked with UK development finance institution CDC Group to produce [good practice guidance for the private sector on addressing GBVH](#). This was accompanied by [sector guides](#) for the public transport, manufacturing and construction sectors. The IFC held a webinar on the new guidance for investees and others in September 2020. Another three sector guides are being developed for education, hospitality and agribusiness. Several other IFIs have developed, or are developing, good practice notes, including guidance for different regions and for major civil works contracts.

¹¹ 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.

¹² For details of the seven common principles, see [commitment document](#).

¹³ Most IFIs refer to the risks around SEAH in their operations as being related to gender-based violence and harassment (GBVH). GBVH includes SEAH, as well as harassment/violence not of a sexual nature.

3. **Updating environmental and social policies with references to GBVH** – Many IFIs have strengthened their environmental and social policies with explicit references to preventing and mitigating GBVH, including SEAH. To support implementation of these policies, some IFIs have developed GBVH risk screening tools to determine the level of due diligence needed for individual projects, as well as prevention, mitigation and monitoring measures. Some IFIs have developed guidance for investees on safe, ethical and survivor-centred reporting and management of SEAH allegations. Others have introduced additional obligations during the procurement process related to preventing SEAH/GBVH.

Challenges and Lessons

1. **COVID-19 has increased GBVH/SEAH risks in all communities, including those with whom IFIs work** – Some IFIs have provided training to medical staff and community health workers on COVID-19 patient procedures, including protocols to protect women and children. In some countries, IFIs supported governments to promote support services for people experiencing GBVH/SEAH under quarantine. Some IFIs are also funding services such as shelters, hotlines with referral pathways and access to medical services. IFIs are committed to making crisis response activities gender-sensitive and supporting groups who are disproportionately affected by the pandemic, particularly women. Due to travel restrictions, IFIs have had to shift much of their monitoring and reporting online. They have provided guidance to investee businesses, to continue promoting high environmental and social safeguarding standards.
2. **Fostering a culture of speaking up can be challenging** – Many IFIs are addressing this challenge through ‘speak-up’ campaigns, which aim to promote a safe environment for staff and managers to seek help and advice, alleviating fears of retaliation or retribution in line with formal policies. IFIs have also provided specialised training for staff and implementing partners on SEAH to enable staff to have conversations with each other, partners and clients on this topic. Some IFIs have seen an increase in reporting of concerns related to harassment, from both victims and bystanders, as efforts to raise organisational awareness have increased. IFIs have found that creating a culture of respect and raising awareness of SEAH is important even in a remote working environment (for instance, during COVID-19 restrictions). Many have shifted safeguarding training for staff online and are using this as an opportunity to reach people in more diverse locations.
3. **Greater IFI alignment is needed for working with government counterparts and implementing partners** – IFIs intend to step up engagement, including with other multilateral organisations and bilateral agencies, to better align their approaches to GBVH/SEAH. An event is planned later in 2020 with IFIs and other technical experts to facilitate increased alignment.

Case Study

The World Bank group applied its gender-based violence (GBV) risk screening and assessment tools to a large hydro power project in sub-Saharan Africa, assessing the project's GBV risk as 'High.' To reduce this risk, an IFC GBV expert conducted a detailed assessment of GBV risks to local communities, while the World Bank's in-country gender expert reviewed available resources and quality-assessed GBV service providers.

The client was found to have little knowledge of GBV and sexual exploitation and abuse (SEA), requiring capacity building and policies and grievance mechanisms to systematically prevent GBV/SEA. Sexual exploitation of adolescent girls by older men in exchange for economic security was common practice locally. Influx of male workers, presence of military and shifting family dynamics also contributed to GBV/SEA risks. There was a lack of available GBV response services in the project area and the country overall.

To address these risks, the client implemented the following actions during the past year: engaged a local NGO to provide GBV/SEA case management and support services, including setting up an office near the project; introduced a GBV/SEA grievance mechanism and standard operating procedures for GBV/SEA response; updated internal policies to include references to GBV/SEA and a code of conduct, targeting all employees and subcontractors; and trained focal points. The client will also support GBV prevention programmes for the broader community near the project.

Reporting of Cases

All IFIs report trends in complaints related to ethics, integrity, and code of conduct issues to their Boards and most publish these figures in regular reports.

There was a slight downward trend in number of SEAH reports across the nine IFIs that contributed to this update report,¹⁴ from 62 SEAH cases reported in 2018 to 58 in 2019.¹⁵

- Three IFIs saw SEAH reports increase, three saw a decrease, and three said the number of SEAH reports remained flat.
- For some IFIs where SEAH reports decreased, reports of other types of bullying and harassment or misconduct increased, suggesting an overall improvement in the speak-up culture.
- Across the IFIs, 20 percent of cases were substantiated, while a number of cases were still being investigated at the end of the reporting year.
- Institutions used a range of measures to follow up on substantiated cases, including termination of employment, suspension, written censures or reprimands, and other disciplinary measures. In some cases, the staff against whom allegations were made resigned before the conclusion of investigation.
- For the relatively small number of reports regarding consultants and partners, actions taken include permanent debarment and referrals to national authorities.

¹⁴ The IMF did not participate in this update report, as the questionnaire did not align well with its operations. However, it fully supports the principles adopted in the April 2018 Joint Statement and the October 2018 Summit Commitments and has taken steps to address safeguarding against SEAH.

¹⁵ Not all reporting years for IFIs are the same: some report by fiscal year, and others report by financial year. Not all investigations are concluded in the same year that the report is made, so some conclusions and follow-up information may relate to cases reported in previous years.

4. UK NGOs

Introduction

In 2018, UK international development non-government organisations (NGOs) presented a set of [commitments to tackle sexual exploitation, abuse and sexual harassment \(SEAH\)](#). These were developed by Bond, in consultation with its members, and set out NGOs' approach to improving their safeguarding practices. The safeguarding commitments form part of the Bond charter, which all 400+ Bond members have signed up to. In the last year, Bond and members have produced a [set of case studies](#), to complement the commitments and demonstrate how NGOs are implementing them.

Progress

1. **Better safeguarding practice, leading to positive impacts on communities, victims and survivors** – In Bond's annual safeguarding survey, conducted in August 2020, 89 of the 100 respondents said safeguarding practice has improved in their organisations over the last year. Just over half of respondents said they have evidence that this has positively impacted communities, victims and survivors. Examples include staff seeking guidance on what or how to report when they see wrongdoing, and communities demonstrating that they understand their rights by raising concerns and showing greater confidence in reporting mechanisms and how NGOs will respond.
2. **Safeguarding leadership and culture tool** – The NGO commitments included a pledge to develop diagnostic and benchmarking tools to support organisations to assess their internal safeguarding culture. Bond and an NGO-led task team have developed a tool to help leaders and organisations understand and improve their safeguarding culture, setting out six key principles and 19 behaviours. The tool is designed to facilitate discussion and help organisations produce action plans for improvement. The UK government is funding Bond to develop this into a digital tool, in consultation with NGOs. The tool will be available on Bond's website from the end of 2020.
3. **Initiatives to prevent perpetrators of SEAH from moving around the sector** – NGOs continue to play a crucial role in developing and implementing new employment cycle initiatives, which were conceptualised by NGO working groups in the run-up to the London Summit and are part of the NGO commitments. More than 50 NGOs are now signed up to the Misconduct Disclosure Scheme, launched in 2019 and implemented by SCHR. The Aid Worker Registration Scheme working group has mapped existing ID-style systems, commissioned a legal review and completed an initial consultation with the sector. Several Bond members are participating in an aid sector working group to inform Project Soteria, FCDO's pilot project with INTERPOL to improve criminal record checks internationally.

4. **Increased cross-sector collaboration on safeguarding** – NGOs committed in 2018 to collaborate with others on safeguarding, including government, donors, businesses, civil society networks, local partners and UK charities. NGOs have demonstrated commitment and determination to learn from others and to share knowledge and expertise. Over the past year, Bond has hosted over 400 participants at safeguarding conferences, webinars and other events, and provided safeguarding training to over 350 individuals from more than 120 organisations. Participants have included Bond members, the wider NGO sector, private sector aid organisations and national NGO alliances outside the UK.

Challenges and Lessons

1. **The most effective accountability mechanisms are those embedded in communities** – Despite being aware of this, NGOs find it challenging to navigate the balance between compliance, local ownership and developing effective community-level accountability mechanisms that will encourage reporting and a culture of speaking up. It is also challenging to tailor accountability mechanisms to different contexts in which organisations work, and to specific programmes. To address this, Bond and its members have created an online library for NGOs to share country-specific safeguarding information and mapping, which is used and updated frequently.
2. **Financial and staff resources for safeguarding remain a challenge** – More than 60 percent of respondents to Bond’s survey said they boosted safeguarding resourcing in the past year, with most increasing staff time and a smaller number saying they increased safeguarding training and budgets. NGOs continue to highlight challenges around funding and resourcing for their safeguarding activities. The complexity of safeguarding means that effectively embedding it in organisations requires continuous, rather than one-off, financial and staff resource. COVID-19 has exacerbated resourcing challenges, prompting an urgent shift in priorities and creating uncertainties around funding for NGOs.
3. **NGOs require further support to work with partners on safeguarding** – More than half (53 percent) of survey respondents said that working well – and doing effective safeguarding – with partner organisations remains a challenge. Institutional and cultural norms in the aid sector can favour top-down approaches to working with local partners. Along with a tendency towards short-term, project-focused funding arrangements, this leads to insufficient investment in strengthening Southern-led organisations’ safeguarding. NGOs are keen to move beyond a ‘tick-box’ approach to safeguarding due diligence, through strong implementation and embedding safeguarding into the culture of organisations they work with. In November 2019, Bond published a [Change Statement on Safeguarding in Successful Partnerships](#) to begin addressing these challenges. Bond and its members are working closely with FCDO to implement recommendations in the Change Statement.

4. **COVID-19 has prompted adaptation of safeguarding processes** – More than half of respondents to Bond’s survey said they adapted their safeguarding activities as a result of COVID-19. Examples include mapping additional barriers to reporting concerns; adapting feedback mechanisms; adopting digital safeguarding measures for online engagement; carrying out remote investigations; and producing guidance for staff, partners and communities. Some NGOs have used radio or TV to share safeguarding messages, while others have run webinars to ensure safeguarding remains a priority during the pandemic.

Case Study

Building trust with communities is an important part of international NGO Restless Development’s safeguarding strategy. In early 2020, the organisation ran a campaign in Sierra Leone to raise awareness among community leaders about its commitment to safeguarding. Months later, a safeguarding concern linked to a Restless Development programme was reported to a Town Chief.

As a result of the campaign, the Town Chief immediately alerted Restless Development. The Town Chief also helped Restless Development to investigate the case by arranging meetings, explaining the process to community members and supporting individuals involved to share information.

Restless Development concluded that its Code of Conduct had been breached (though no law had been broken) and took disciplinary action. The NGO received feedback from the Town Chief that its ability to reach such an outcome had reduced the distress of the survivor and prevented fallout from the incident from escalating within the community.

Restless Development engages regularly with its safeguarding officers in country and will use learning from this experience to influence safeguarding activities in the countries where it works.

Reporting of Cases

Bond’s safeguarding survey in August 2020 asked NGOs how the number of safeguarding incidents reported to their organisation compared to a year ago. More than half (54 percent) of the 89 organisations that responded to this question said the number of incidents reported remained the same. About 40 percent saw an increase, while only 6 percent said safeguarding reports had decreased.

There is currently no standardised approach for aid organisations to collect and share data on SEAH safeguarding, and definitions of what constitutes a safeguarding incident vary between organisations. This means it is not possible to aggregate data across the sector. Despite this, some NGOs are taking initiatives to increase transparency on reporting of safeguarding incidents and have included information on SEAH safeguarding cases in their annual reports or on their websites.

5. UK Private Sector Suppliers

Introduction

In October 2018, UK private sector suppliers presented a set of [commitments to prevent and respond to sexual exploitation, abuse, and sexual harassment \(SEAH\)](#). In May 2019, they set up a Safeguarding Leads Network (SLN) for private sector suppliers that sign up to these commitments. Membership currently stands at 24 organisations. The SLN meets quarterly to monitor progress, share lessons, improve practice and build technical capacity on safeguarding.¹⁶ The SLN and its members collaborate closely with FCDO, other bilateral and multilateral development organisations and NGOs.

Progress

1. **Building in-house and partner capacity on safeguarding** – More than half of SLN members surveyed in August 2020¹⁷ said they have further strengthened their in-house capacity on safeguarding in the last 12 months. This includes appointing safeguarding staff, such as safeguarding focal points, at different levels in their organisations. Many companies have upskilled existing staff, including providing specialist training for business functions with safeguarding responsibility such as business development teams or HR. In addition, 83 percent of SLN survey respondents said they have invested in building capacity of downstream partners. More than half have delivered safeguarding-specific training for partners during the last year, and nearly 40 percent conducted enhanced due diligence checks on partners to assess their safeguarding capacity. SLN members have also supported partners to develop safeguarding policies and strategies – for example, one organisation is supporting government institutions in Nigeria and Mexico to develop their own safeguarding strategies.
2. **Safeguarding culture and reporting** – Many SLN members said they have strengthened their organisational culture to prevent SEAH from happening and to encourage reporting of incidents, including low-level concerns. This has included delivering tailored communications to boards, headquarters and country offices. One company established a programme of engagement with senior management teams, led by a global expert on social norms, toxic masculinities and culture change. Others have trained support staff and bystanders to call out unacceptable behaviour. Meanwhile, 88 percent of survey respondents said they have taken steps to improve reporting mechanisms in the past year, including adding new reporting channels and providing training on these. The SLN provided whistleblowing training to its members in January 2020. Several organisations used the materials to draft or refine their whistleblowing policies.

¹⁶ To request the Terms of Reference or join the SLN, write to safeguardingleadsnetwork@gmail.com. To join the Safeguarding Leads Network LinkedIn group for members, [send a request here](#).

¹⁷ The SLN surveyed its (then) 23 members to inform this report. The survey had a 78 percent response rate and findings were validated in a dialogue session with members.

3. **Developing and strengthening policies** – Members of the SLN have continued, or (for new members) started, to strengthen their safeguarding and related policies. This includes work to reach organisation-wide consensus on definitions of certain forms of SEAH, such as prostitution; efforts to better reflect systemic power imbalances in policies, prompted by the Black Lives Matter movement; and clauses to prevent non-disclosure agreements from being used in sexual harassment cases. Members are exploring other thematic areas, such as safeguarding for people with disabilities.
4. **Enhanced vetting and recruitment practices** – Over the past year, 94 percent of SLN members surveyed have improved their vetting and recruitment processes. Half of survey respondents added layers to vetting checks, including engaging third-party screening services, conducting in-country background checks and doing more informal checks (such as online searches). A third of respondents have added safeguarding-specific measures to recruitment processes, for instance adding safeguarding questions to interviews and reference requests. Several SLN members are part of a working group for Project Soteria with INTERPOL, while others plan to sign up to the Misconduct Disclosure Scheme when it becomes available to private sector organisations. SLN members have also provided FCDO with feedback on the legal review for the Aid Worker Registration scheme.

Challenges and Lessons

1. **Ongoing investment is required to train staff, contractors and partners** – While SLN members have made demonstrable gains in terms of availability and quality of safeguarding training over the past year, it is clear that ongoing investment will be required to refresh these skills and as new staff, consultants and partners join teams. To address this challenge, SLN members intend to integrate safeguarding resourcing and other costs into budgets from the bid stage. Members will evaluate the effectiveness of their training to ensure continual improvement.
2. **More work is needed to adapt reporting mechanisms and opportunities to speak up to local contexts** – Although SLN members have invested heavily in reporting mechanisms over the last year, these are often created at head office level and require further adaptation to local contexts. Over the next year, several SLN members plan to implement community-based reporting mechanisms. It is important to ensure that reporting hotlines are accessible, affordable and give appropriate advice in all countries and contexts. It will also be important to build community confidence in available reporting systems so people feel safe to report concerns.
3. **Providing a survivor-centred response remains a challenge** – Over the next year, the SLN will provide its members with technical sessions on enhancing support to survivors of SEAH. SLN members are also planning to train investigators on survivor-centred approaches to managing cases, expand their networks of service providers to better respond to survivors' needs, and work with programme teams to identify quality local services that survivors can access.

4. **COVID-19 is a challenge that requires adaptation of safeguarding measures**
 – Private sector suppliers have taken steps to adapt their safeguarding controls to the pandemic, for instance by moving training online and developing resources to mitigate digital safeguarding risks. Recognising the increased risk of domestic violence or SEAH in the home during periods of remote working, organisations have provided staff with training sessions on wellbeing and additional reporting channels. The pandemic and associated lockdowns have highlighted the importance of addressing digital safeguarding. Safeguarding risk assessments and mitigation measures will need constant adjustment as countries start to emerge from the immediate COVID-19 crisis.

Case Study

In response to a survey on safeguarding training needs at one private sector aid organisation, a member of staff reported that at a drinks party for a programme team a consultant had tried to 'hook up' with a junior staff member. This demonstrated that staff and consultants were unclear about what constitutes sexual misconduct and how SEAH relates to power imbalances.

The organisation responded by providing targeted training to address these issues. The consultant was interviewed and his behaviour was carefully monitored, eventually resulting in his removal from the programme team. The organisation's leadership has now made training mandatory for all staff, including programme staff and consultants, to communicate the foundations of 'do no harm' and to reinforce a culture of 'calling out' inappropriate behaviour and reporting all safeguarding concerns as a matter of organisational safety.

This case demonstrates the need for continued training and sensitisation to ensure all staff and consultants understand the parameters of acceptable behaviour. It also demonstrates the need for measures to prevent perpetrators of SEAH from moving around the sector, and for reporting mechanisms to be clear, accessible and reliable so that staff are confident to report such cases through formal channels and concerns can be dealt with immediately.

Reporting of Cases

The development sector's ability to obtain reliable sector-wide data on SEAH reports is hampered by inconsistencies on definitions and parameters to be reported, and the lack of a formal, independent, centralised system of reporting. Despite these challenges, all SLN members surveyed said they have taken steps during the past year to improve data collection and availability, with a focus on standardising data collection and centralising data. Some have invested in tools to generate aggregated reporting to help them identify and respond to trends.

Most (61 percent) of the survey respondents said the number of SEAH reports they received over the past 12 months was similar to the previous year. Twenty-eight percent said reports had increased, while 11 percent said they had decreased. It is important to note that the COVID-19 pandemic may have skewed reporting this year.

6. Research Funders

Introduction

In 2018, five UK funders of international development research¹⁸ jointly [committed to raise safeguarding standards across the sector](#), in order to prevent and tackle all incidents of harm and abuse, including sexual exploitation, abuse and sexual harassment (SEAH), building on existing good practice. Over the past two years, these funders have worked closely with UK Collaborative on Development Research (UKCDR) to develop safeguarding principles and guidance for the sector, to support implementation of the commitments.

Progress

1. **Guidance on safeguarding in international development research** – Over the past year, funders of international development research worked with UKCDR to develop guidance on [safeguarding in international development research](#). The guidance, developed by a team at University of Liverpool in partnership with UKCDR, builds on the [evidence review and good practice guidance](#) published in 2019 and focuses on four principles: 1. Rights of victims/survivors and whistleblowers, 2. Equity and fairness, 3. Transparency, and 4. Accountability and good governance. To ensure the guidance is appropriate to different contexts, international consultations were held in West Africa, South East Asia, Latin America and the UK. A consultation survey was developed and translated into French and Spanish. The survey received over 550 responses from across the world. The final guidance was published in April, along with a report detailing the [international consultation process](#). In response to the COVID-19 pandemic, a [companion piece on practical application of UKCDR safeguarding guidance during COVID-19](#) was published alongside the main guidance.
2. **Improved safeguarding policies and practice** – UK research funders are updating their safeguarding policies and practices, aligning these with the UKCDR guidance. In May, UK Research and Innovation (UKRI) published a [safeguarding policy for research](#). The Department for Business, Energy & Industrial Strategy (BEIS) is developing a new safeguarding policy in consultation with delivery partners, which is expected to be published by the end of 2020. The Department of Health & Social Care (DHSC)'s Global Health Research Programme, led by the National Institute of Health Research (NIHR), has strengthened safeguarding clauses in its research contracts. DHSC is also drawing on the UKCDR guidance to develop guidance for research contracted by NIHR, and is appointing and training designated Safeguarding Leads to support organisations awarded funding by NIHR's Global Health Research Programme. Wellcome, a research charity, is mapping the guidance to its existing policies to identify gaps and will use the findings to amend existing policies or develop an independent safeguarding policy.

¹⁸ The Department for International Development (DFID), now the Foreign, Commonwealth and Development Office (FCDO); the Department for Business, Energy & Industrial Strategy (BEIS); the Department of Health & Social Care (DHSC); UK Research and Innovation (UKRI); and Wellcome.

3. **Building institutional capacity on safeguarding** – Last year, the need to build institutional capacity for safeguarding in the international development research sector was highlighted as a challenge. UKCDR’s new guidance goes some way towards addressing this. The guidance has been promoted through presentations to Russell Group University research managers and directors, and through webinars. A public webinar held in July for the research community was attended by 767 participants and has been viewed 260 times since. The guidance has received 2,661 views on the UKCDR website since its publication, and the COVID-19 companion piece has had 1,752 views. As a result of this guidance, several universities have developed or updated their safeguarding policies, practices and training for researchers working internationally. For instance, the University of Liverpool Research Ethics Committee adopted the guidance, as did their international research partnerships team. They are using it to strengthen research proposals and incorporating it into training. Meanwhile, researchers at the University of Leeds organised a series of webinars on safeguarding aimed at researchers and practitioners, building on the evidence review and guidance.

Challenges and Lessons

1. **Safeguarding guidance for international development research needs to be accompanied by training** – Since publication of the UKCDR guidance, it has become clear that there is a need for safeguarding training that builds on the guidance, to socialise best practice within organisations. The non-prescriptive, question-based format of the guidance lends itself well to developing training materials. Some institutions, such as University of Leeds and the Liverpool School of Tropical Medicine (LSTM), have done this for specific projects (see Case Study). However, there is unmet demand for training of this type and research institutions do not all have the resources to develop project-level bespoke materials.
2. **COVID-19 poses a challenge for safeguarding in international development research** – Many research funders and institutions have had to work under challenging conditions, with normal activities and processes disrupted. COVID-19 has delayed publication of some research funders’ safeguarding policies, and many research institutions have less capacity to respond to funder policies and safeguarding guidance as a result of the pandemic. Planned in-person events to engage with the research community on safeguarding have been postponed due to social distancing rules. Given the increase in research in response to COVID-19, and the fact that the pandemic itself poses specific safeguarding challenges in the research sector, funders have produced COVID-specific guidance to ensure that safeguarding remains a priority despite the need for rapid research. This was promoted in a webinar attended by over 700 participants. UK research funders have signed up to 7 funder principles for supporting high quality research in epidemics and pandemics. Developed by UKCDR and the Global Research Collaboration for Infectious Disease Preparedness, these include ‘Protection from Harm’ as a key principle.
3. **Best practice on safeguarding in international development research is relevant to the broader research sector** – The guidance and funder policies on

safeguarding for international development research highlight practices, considerations and issues that are applicable to the broader research sector. Some funders such as UKRI have broadened the scope of their safeguarding policies based on the UKCDR guidance, to apply to all research they fund.

Case Study

The ARISE Hub, a £13-million research hub co-led by the Liverpool School of Tropical Medicine (LSTM) which focuses on research in informal settlements in Bangladesh, India, Kenya and Sierra Leone, used UKCDR's safeguarding guidance (developed in partnership with LSTM's safeguarding lead) for international development research to produce training for researchers and community-based peer researchers in Sierra Leone.

The question-based format of the guidance enabled training materials to be tailored to the specific context of Sierra Leone, where co-researchers work in urban settlements to identify and address community health and wellbeing needs. Training was conducted in country by safeguarding leads from the College of Medicine and Allied Health Sciences and the Sierra Leone Urban Research Centre, and the definition of safeguarding was translated into the local language to ensure it was accurately understood. This training also covered identification of relevant referral pathways for safeguarding issues and accountability for managing safeguarding violations.

This demonstrates how the safeguarding guidance can be used in different contexts to strengthen safeguarding policies and practices and engage communities, in order to raise safeguarding standards in the sector, particularly in lower or middle-income countries.

Reporting of Cases

At present, there is no harmonised approach or standardised methodology for collecting information about safeguarding breaches across the sector. However, some research funders do collect safeguarding case data for the research projects they fund.

Over the past year, UK research funders have taken steps to clarify appropriate complaints mechanisms in their policies, while others are working to identify gaps in their existing mechanisms based on the new UKCDR guidance.

In October 2019, allegations of sexual harassment were reported in the media concerning two downstream partners in DHSC research funding. Alleged perpetrators were staff at research institutions, but neither the individuals nor their departments received DHSC funding. The UK government, through DFID (now FCDO), recorded the concerns and reviewed them in line with robust operating procedures. DHSC is now working to provide incident reporting forms along with safeguarding guidance to organisations that receive its grants, which will facilitate better data collection and monitoring of safeguarding investigations.

As UK research funders move towards implementation of their new policies and guidance, they will explore the most effective way to demonstrate impact. This will include considering what data can and should be collected and shared by funded research institutions, giving due regard to legal issues such as data protection and discrimination.

7. CDC Group

Introduction

In 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](#). CDC's commitment to ensuring that it has robust safeguarding¹⁹ measures has continued to evolve over the past year, during which CDC has engaged closely with FCDO on its safeguarding approach. CDC's board monitors and receives progress reports on the work being carried out to implement its safeguarding commitments.

Progress

1. **Safeguarding incident management procedure** – In line with its survivor-centred approach to safeguarding, CDC developed and implemented a safeguarding incident management procedure, which sets out how to assess, escalate, record, report and work with investees to manage safeguarding incidents in CDC investments. As well as providing a mechanism for informing CDC of incidents, the procedure aims to minimise the likelihood and impact of safeguarding incidents, for both individuals and business operations, and ensure these are resolved in a way that protects all parties (particularly victims/survivors of SEAH).
2. **Revising safeguarding language in CDC's legal agreements** – While safeguarding has been a requirement in CDC's Code of Responsible Investing since 2012, CDC has now revised its legal agreements across all investment products to include greater detail and specificity on safeguarding definitions and requirements to report incidents to CDC. They have shared these definitions with the International Finance Corporation (IFC) and HMG to increase consistency of language across the DFI community.
3. **Understanding safeguarding risks in CDC's investment portfolio** – CDC is making concerted efforts to understand where risks of gender-based violence and harassment (GBVH), including SEAH, sit in its portfolio and how best to manage these. CDC commissioned a consultant to develop a [briefing note on mapping gender risks in CDC's investment sectors and geographies](#), drawing out areas of gender risk in the IFC Performance Standards. As mentioned earlier in this report, CDC worked with EBRD and IFC to produce good practice guidance for the private sector on addressing GBVH, including sector-specific guides. Meanwhile, CDC has rolled out training programs to increase awareness of GBVH among its own staff. This includes a safeguarding video that will be deployed to existing staff and included in the inductions of all new CDC staff.

¹⁹ For CDC, safeguarding comprises risks associated with gender-based violence and harassment (GBVH), which includes SEAH, as well as modern slavery and child exploitation and abuse. In this report, CDC is reporting progress only on the GBVH dimensions of its safeguarding agenda.

4. **Further improvements to gender balance at senior management level** – Recognising that SEAH results from power imbalances, CDC committed in 2018 to improve the gender balance within its senior management. As of September 2020, 32 percent of director roles and above were filled by women – up from 27 percent in September 2019. It remains CDC’s corporate objective to increase the percentage of women in senior roles to 34-36 percent by 2023.

Challenges and Lessons

1. **Advancing women into greater positions of authority is critical to address the underlying power dynamics that drive SEAH** – Women’s economic empowerment remains a challenge throughout the contexts in which CDC works. This year, CDC has taken continued steps to tackle this as part of its Gender Strategy, including working with a selection of investees on gender action plans, many of which are focused on advancing gender diversity and inclusion within the workforce. Insights from these will be shared across the portfolio. CDC has also partnered with the [Financial Alliance for Women](#), a leading global network of financial institutions dedicated to growing the female economy. One output of this partnership is a *Guide to becoming an employer of choice for women*, to ensure diversity and inclusion is embedded in practice.
2. **CDC’s support to investees on safeguarding requires further staff capacity-building and training** – CDC has identified a need for its investment and transaction support staff to receive further training on safeguarding and GBVH. A shortage of suitable external consultants to support investees on these matters, as well as travel restrictions for consultants as a result of COVID-19, are currently a barrier to the adoption and integration of better safeguarding practices among businesses in CDC’s portfolio. As a result, CDC has developed new internal training and awareness-building materials for its staff, as well as guidance and sector-specific briefs.
3. **Cultural and societal barriers may discourage investees from discussing safeguarding with their workforces** – CDC notes that cultural barriers within its investee businesses can be a barrier to useful discussions about GBVH, including SEAH. In addition, workers at these companies sometimes lack trust that grievance redress mechanisms (GRMs) will provide an effective remedy in relation to GBVH. In response to this challenge, CDC is working to increase awareness of GBVH among businesses within its portfolio and is exploring ways to improve guidance on GRMs so employees of investee companies are more likely to use them.
4. **COVID-19 has exacerbated safeguarding risks** – Travel restrictions have reduced the ability of CDC staff to visit investments, limiting the extent to which CDC can directly support companies in assessing and managing safeguarding risks and issues, and placing additional expectations on consultants who may not have the requisite skills or experience for this. As a result, CDC included references to GBVH in its COVID-19 guidance (e.g. [Guidance for Job Protection during Covid-19](#)). CDC also ran a series of seminars across core geographies and sectors focusing on social risk management, including gender risks affected by COVID-19.

Case Study

CDC is supporting an Indian logistics company to provide safe employment opportunities for women through a series of gender-focused activities, including a gender strategy and action plan. Measures the company is taking as a result include:

- Establishing GBVH policies and grievance mechanisms;
- Providing gender-sensitive facilities and infrastructure, including female changing rooms and toilets;
- Training staff on grievance mechanisms so incidents are more likely to be reported;
- Establishing an impact measurement and monitoring system to track progress against the company's Gender Action Plan over time.

Alongside measures to increase the number and quality of jobs for women in the company, this project will contribute to safer work and greater economic empowerment for the women affected.

Reporting of Cases

As a result of CDC's focused efforts to raise awareness and build internal and investee capacity on safeguarding, reporting of safeguarding incidents from investees to CDC staff has increased and the organisation has been better able to track these.

Between July 2019 and July 2020, CDC became aware of nine safeguarding incidents, one of which was categorised as *severe impact and significant safeguarding incident*, one categorised as *high impact*, and seven categorised as *low-medium impact*.²⁰ CDC staff were involved in the investigation and/or review of all incidents, and will continue to work with the relevant companies or investees to enhance safeguarding capacity, governance and reporting until the incidents are resolved in line with CDC's Safeguarding Incident Management procedure and Significant Risk Event process.

²⁰ As defined under CDC's Safeguarding Incident Management Procedure. Assessment of impact and significance is drawn from existing industry benchmarks, including the ILO, SEDEX and external expertise commissioned to advise on safeguarding incidents. The level of impact is determined across various categories including: impacts to human safety and wellbeing, legal and normative and reputational risks.

8. Gavi and Global Fund

Introduction

Gavi, the Vaccine Alliance and the Global Fund to Fight Aids, Tuberculosis and Malaria (Global Fund) are Geneva-based²¹ financing agencies that receive funding from public and private sources. They are significant donors to health programmes in developing countries. In 2018, the two institutions signed up to joint [commitments to prevent and respond to sexual exploitation, abuse and sexual harassment \(SEAH\)](#) in their own and their partners' operations.

Progress

1. **Aligning policies with safeguarding best practice** – This year, Gavi and the Global Fund have continued work they started in 2018 to align their policies with best practice and global minimum standards on safeguarding against SEAH, including the DAC Recommendation and the IASC Minimum Operating Standard on PSEA. The Global Fund updated its staff Code of Conduct to include references to bullying and harassment, including sexual harassment and abuse of power, and held mandatory training sessions on this. The Global Fund is also reviewing recommendations from SEAH experts on how to incorporate best practices into staff training, its grievance policy and organisational culture. Gavi updated its Whistleblower Policy and is in the process of revising its disciplinary procedures to include clearer language on reporting mechanisms, investigations and confidentiality. In November 2019, Gavi conducted workshops for its HR and legal teams on how to handle safeguarding complaints.
2. **Review panel on SEAH** – the Global Fund established a senior review panel on abuses of power, including SEAH, which is chaired by its Chief of Staff and includes the Global Fund's independent Office of the Inspector General as an observer. The panel meets regularly to review continued implementation of the Global Fund's safeguarding commitments, to agree on responses to SEAH allegations reported within implementing partners (including government agencies and NGOs), and to ensure lessons are learnt from SEAH cases.
3. **A more gender-balanced and inclusive workforce** – Gavi and Global Fund committed in 2018 to work towards gender parity in senior management and throughout their workforces. This is important because power imbalances contribute to SEAH. In June 2020, the Global Fund recruited Adda Faye as its Chief Financial Officer, the first time this position has been held by a woman. She is also the Global Fund's first CFO from a low/middle-income country. In 2019, the Global Fund was certified as an equal salary employer by the Equal-Salary Foundation. A monitoring visit in May 2020 confirmed that adequate actions had been taken to address minor discrepancies identified in the 2019 audit. Gavi was

²¹ Gavi also has a small office in Washington, D.C.

certified as an equal salary employer in 2018, successfully completing annual audits in August 2019 and August 2020. Both Gavi and the Global Fund ran awareness sessions in November 2019 on unconscious bias to promote inclusion in their workplaces.

Challenges and Lessons

- 1. Rolling out policies across the wide stakeholder landscape of the Global Fund remains a challenge** – The Global Fund provides funding directly to hundreds of partners, both governments and (international) NGOs, who in turn contract organisations to implement programs. The Global Fund is revising its Codes of Conduct for suppliers and implementers, including stronger references to its prohibition of SEAH and expectations that allegations will be reported and investigated. The Global Fund planned to introduce these in 2020. However, this has been delayed due to COVID-19, which has hampered travel and reduced capacity of both the Global Fund and its partners to engage on this issue.
- 2. Dealing with safeguarding allegations has helped to clarify processes, roles and responsibilities** – In 2019, the Global Fund received a number of safeguarding allegations from implementers. Responding to these has helped it to refine its safeguarding processes. In some cases, the Global Fund provided support to implementing partners to run their own investigations, while monitoring the quality of these. In other cases, the Global Fund's independent Office of the Inspector General launched an investigation. The Review Panel has helped the Global Fund to determine the most appropriate responses to safeguarding reports.
- 3. Gavi's work with partners** – Gavi has no staff outside Geneva or Washington DC, and the vast majority of its funding is used for the purchase of vaccines that are distributed in implementing countries, with the assistance of its core Alliance partners, the WHO, UNICEF and the World Bank. Through engagement with its partners, Gavi is reassured by each organisation's response to handling SEAH and safeguarding and continues to discuss these issues. However, it is an inherent challenge that Gavi does not have a right to access information about SEAH cases reported to partner organisations or the ability to conduct its own investigation without the explicit consent of the partner.

Case Study

Early in the COVID-19 pandemic, the Global Fund and Gavi became aware of a heightened risk of domestic abuse (including SEAH) during confinement, as this was being flagged as a widespread concern by the media and by organisations that work with victims/survivors of domestic abuse.

To ensure safeguarding of staff during periods of lockdown, when staff were required to work from home, the Global Fund trained focal points in its HR team to identify signs of domestic violence (including SEAH) among staff, including emotional symptoms such as increased stress, anxiety, depression and low-self-esteem. Both Gavi and the Global Fund provided regular messages to their staff on domestic abuse, including through tailored information sessions. The Global Fund made enhanced psychological support available to staff, through a Staff Counsellor. Both organisations provided context-specific advice on how to report domestic abuse and access support services.

Reporting of Cases

Over the past year, the number of SEAH allegations received by the Global Fund remained flat. This compares with a small increase in the number of allegations received in 2018-19 versus a year earlier, which was attributed to increased awareness at staff and implementing partner level. In July 2019, the Global Fund notified its Ethics and Governance Committee of the number of SEAH allegations involving staff members, actions taken and the outcomes of these. An update on cases among staff and a report on allegations among implementing partners was provided to the Committee in March 2020, including an update on the Review Panel. Such reports will happen at least annually, and more frequently if required.

Gavi received no allegations of SEAH from staff in 2018 or 2019, or in 2020 to date. Gavi received one report of an SEAH investigation at an implementing partner, but the case was not connected to Gavi. Gavi is in the final stages of revising its policies related to reporting allegations and handling investigations, to clarify employees' rights, the reporting process and applicable legal standards. By revising these policies, Gavi intends to increase awareness of reporting mechanisms and encourage people to speak up.

9. Red Cross Red Crescent

Introduction

The Red Cross Red Crescent Movement (RCRC) is represented on the CSSG by the British Red Cross (BRC), which joined in January 2020. In December 2019, BRC published a [pledge to prevent and respond to SEAH in humanitarian action](#) at the 33rd International Conference of the RCRC in Geneva, reiterating the Movement's long-standing commitment to preventing and responding to sexual exploitation and abuse.²² The pledge is aligned with the four long-term shifts highlighted at the London Safeguarding Summit. So far, the pledge has been signed by five National Societies and three states.²³ It remains open for signature until the end of 2020. As a CSSG member, BRC has provided an update on progress related to its pledge.

Progress

1. **National Societies developing PSEA policies** – The RCRC's pledge encourages all Movement actors to adopt a zero-tolerance policy towards SEAH. The International Federation of Red Cross and Red Crescent Societies (IFRC) and the International Committee of the Red Cross (ICRC) adopted PSEA policies in 2018 and 2019 respectively. To date, four National Societies have adopted a PSEA policy – Kenya (2014), UK (2018), Ivory Coast (2020) and Australia (2020), while an additional 14 National Societies have drafts in progress.²⁴ Of 192 National Societies in total, at least 50 have a Code of Conduct that includes a prohibition on sexual exploitation and abuse (SEA). As National Societies develop PSEA policies, they revise their Codes of Conduct to include definitions and prohibition of SEA. In 2019, 10 National Societies joined a PSEA workshop in Malaysia, while 10 others joined webinars on policy development and/or received direct support.
2. **Operational Manual on PSEA** – The IFRC, together with the British and Canadian Red Cross, developed an Operational Manual in August 2020, which is being rolled-out with Movement partners. The Manual is being translated into several languages and will be accompanied by animated videos. The Red Cross and Red Crescent Manual on Prevention and Response to Sexual Exploitation and Abuse has been made available as a reference for the wider aid sector on the UK's [Resource and Support Hub](#) and the [IFRC website](#).

²² Another 33rd International Conference pledge, [A Safe and Inclusive Humanitarian Environment](#) commits the Movement and supporting states to '*Invest, as part of any grant, in capacities for local and national actors, in particular National Societies, to develop and implement policies and practices to promote diversity and inclusion of staff, management and volunteers, and that seek to address abuse of power like sexual exploitation and safeguarding of children.*'

²³ Pledge signatories to date: the Austrian, British, Canadian, Irish and Spanish Red Cross Societies, and the Governments of Australia, Spain and UK.

²⁴ At least 14 National Societies have draft PSEA policies underway in September 2020: Bahamas, Bangladesh, Belarus, Ecuador, Eswatini, French, Liberia, Namibia, Nigeria, Samoa, Solomon Islands, South Sudan, Vanuatu, and Zambia.

3. **Whistleblower hotline and case management system** - The IFRC is introducing a new whistleblower hotline and case management system, and intends to expand this and make it available to National Societies in future. This will enable personnel to report concerns and facilitate real-time reporting and tracking of investigations.
4. **Supporting initiatives to prevent perpetrators of SEAH from moving around the aid sector** – The IFRC and ICRC have signed up to the inter-agency Misconduct Disclosure Scheme implemented by SCHR. British Red Cross and IFRC represent the Movement in an aid sector working group for Project Soteria with INTERPOL, funded through FCDO. BRC also participated in a consultation on the legal review for the Aid Worker Registration Scheme.

Challenges and Lessons

1. **COVID-19 required rapid adaptation of programming, giving due consideration to protection, gender and inclusion** – Drawing from lessons from previous crises, IFRC issued a technical guidance note on how to consider protection, gender and inclusion in responses to COVID-19. The guidance provides recommendations to National Societies on tailoring their COVID-19 responses to the needs and rights of victims/survivors of sexual exploitation and abuse, and on developing survivor-centred PSEA policies and action plans.
2. **Clear guidance and resources are needed to ensure a survivor-centred approach** – It remains a challenge for the whole aid sector and governments to find the right balance between investigating and disciplining perpetrators of SEAH on one side, and resourcing community-based complaint mechanisms and safe and accessible support services for victims/survivors on the other. Progress in protecting people from SEAH requires resourced and watertight standard operating procedures for a survivor-centred approach. IFRC and the Red Cross Red Crescent Movement cooperate closely with inter-agency networks that address gender-based violence and SEAH through local experts. One challenge is how to make these networks' expertise known to all managers, investigators, security staff and others involved in receiving or handling a complaint. It is important to consider urgent medical and other needs for survivors, as well ensuring that sensitive information is shared only on a need-to-know basis.

Case Study

The IFRC has engaged over 50 National Societies in Policy ‘Write-shops’ on preventing and responding to sexual exploitation and abuse. These events, held in Finland, Kuala Lumpur and through webinars, brought National Societies from all regions together to understand concepts, research and legal considerations related to developing policies on preventing sexual exploitation and abuse (PSEA).

Participants collaborated on developing organisational PSEA policies and implementation plans, as well as sharing experiences, good practice and lessons learned. Feedback showed that participants found the information from IFRC and the peer exchange very useful. Lessons shared in the sessions are expected to help them to lift PSEA higher up on the agenda and into resource allocation in their National Societies.

Reporting of Cases

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

Since October 2018, the IFRC has received 27 reports of SEA concerns of which:

- 8 were referred to National Societies or dealt by local law enforcement authorities;
- 2 were referred to National Societies, with the understanding that reports would be produced to the IFRC (the concerns involved National Society Staff, with relation to IFRC-led emergency responses);
- 7 are under investigation by the IFRC, or an investigation is planned;
- 8 are in the preliminary assessment phase (i.e. further information is needed);
- 1 was closed, with disciplinary measures taken; and
- 1 was dismissed (although attempts to gather further information were made, no credible, material or verifiable elements could be found during preliminary assessment)

The British Red Cross collects data on safeguarding²⁵ concerns through its incident reporting system.

- For the 12 months ending 30 June 2020, a total of 1,528 safeguarding concerns were reported to British Red Cross related to its work in the UK.
- In the same period, six safeguarding concerns related to BRC’s work internationally.
- These figures follow the pattern of year-on-year increases of safeguarding reports since BRC introduced a central electronic incident reporting system in 2016. The increase is likely to be the result of better reporting rather than an increase in incidents.

²⁵ All concerns relating to safeguarding children and adults, including SEAH