



House of Commons  
International Development  
Committee

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**Progress on tackling  
the sexual exploitation  
and abuse of aid  
beneficiaries**

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**Seventh Report of Session 2019–21**

*Report, together with formal minutes relating  
to the report*

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## The International Development Committee

The International Development Committee is appointed by the House of Commons to examine the expenditure, administration and policy of the Department for International Development and its associated public bodies.

On 1 September 2020, DFID and the Foreign and Commonwealth Office were merged to form the Foreign, Commonwealth and Development Office (FCDO). The Committee remains responsible for scrutiny of those parts of FCDO expenditure, administration and policy that were formerly the responsibility of DFID.

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## Summary

Since 2018, the International Development Committee has been inquiring into sexual exploitation and abuse in the aid sector. We are determined to keep the spotlight on this issue until we can see that effective, concerted efforts are being taken to combat this problem in every corner of the sector. Our predecessor committee identified several factors that have enabled sexual exploitation and abuse to persist, including a lack of safeguarding culture and ineffective investigations into perpetrators when abuses occur.

We recognise that in the last couple of years aid actors including the Department for International Development, non-governmental organisations, private sector suppliers and the United Nations have introduced new practices and procedures to tackle this problem and improve whistleblowing policies and protections. Many aid organisations have introduced new training to raise awareness among staff and some have employed new preventing sexual exploitation and abuse (PSEA) champions and coordinators. Whilst this is commendable, we are keen to ensure this does not become a box-ticking exercise that fails to address the underlying culture that has enabled sexual exploitation and abuse to persist.

Our evidence has shown that in some parts of the aid sector discriminatory attitudes may have stifled progress in tackling this problem and the entrenched power imbalances make it almost impossible for aid beneficiaries to challenge aid providers. It is clear aid beneficiaries need to be empowered and involved more directly in aid delivery. We advocate for approaches to tackling sexual exploitation and abuse that engage local populations and prioritise support for victims and survivors.

The recent “sex for jobs” scandal during the 2018–20 Ebola response in the Democratic Republic of the Congo was described as an “open secret”<sup>1</sup> yet little seems to have been done to put a stop to it. We need safe reporting mechanisms, designed with local populations so that individuals are empowered to come forward. Individuals also need to trust that if they do raise a complaint, robust investigations will take place and appropriate action taken against the perpetrator if the complaint is upheld. Without these mechanisms, all the efforts that have been directed towards employment cycle schemes such as the Misconduct Disclosure Scheme and Aid Worker Registration Scheme will be completely ineffective at stopping perpetrators from moving around the aid sector with impunity.

We are proud of the impact that the aid sector has achieved in tackling poverty around the world and we want this work to continue, but the sexual exploitation, abuse and underlying culture outlined in this report will continue to undermine its efforts unless organisations do everything they can to stamp it out. The Department for International Development had made positive steps towards holding its implementing partners accountable for their safeguarding practices and the new Foreign, Commonwealth and Development Office (FCDO) must continue to push for change as it takes over stewardship of the aid budget.

1 The New Humanitarian, “[EXCLUSIVE: More than 50 women accuse aid workers of sex abuse in Congo Ebola crisis](#)”, accessed 14 December 2020

# 1 Introduction

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## Previous IDC work

1. This is the third report that the International Development Committee (IDC) has published on sexual exploitation and abuse in the aid sector since 2018. It is the first report by the current committee on this topic and we owe our thanks to our predecessor IDC for the important work it undertook and the impact this had to galvanise efforts to combat sexual exploitation and abuse across the sector.
2. Our predecessor committee adopted this issue in February 2018 when Sean O'Neill, writing in *The Times* newspaper, revealed that Oxfam GB staff, including the Country Director, had been paying local young women for sex in Haiti whilst working on the humanitarian response to the 2010 earthquake.<sup>2</sup> The charity had mishandled its response to the sexual exploitation and abuse and sought to keep the case quiet. When the Committee inquired into the subject it discovered that a cycle had formed whereby scandals break in the press revealing sexual exploitation and abuse in a particular context, for example involving aid workers and peacekeepers in West Africa in 2002 or during the UN peacekeeping mission in the Central African Republic in 2014, which stimulates a flurry of action but little sustained progress to combat the issue is undertaken. We have undertaken a further inquiry because we want to help the aid sector to break out of this cycle and enact deep-rooted, sector-wide change to prevent sexual exploitation and abuse from continuing with impunity.
3. Our predecessor committee published its first report on this topic: Sexual exploitation and abuse in the aid sector, in July 2018. In October 2019 the Committee published its follow-up report to help track progress. We want to use this report to ensure that the new Foreign, Commonwealth and Development Office prioritises this issue as it takes over stewardship of the UK aid budget.

## Previous DFID work

4. Following the Haiti scandal in early 2018, the UK Department for International Development (DFID) showed leadership on tackling sexual exploitation and abuse by hosting two safeguarding summits to help the international community to work together to tackle the scourge of sexual exploitation and abuse. During the International Safeguarding Summit in October 2018 donors representing 90% of global aid signed up to a set of donor commitments for tackling sexual exploitation and abuse and other aid actors signed up to commitments relevant to them. Since then, DFID has introduced measures to increase safeguarding standards at entities in receipt of UK official development assistance (ODA), including enhanced due diligence assessments for its implementing partners.

## Progress update

5. The Haiti scandal in 2018 appears to have marked a significant moment for the aid sector and put the spotlight back onto this issue. Since then numerous aid organisations have taken steps to strengthen their safeguarding work, but it is difficult to assess what tangible impact this has had for victims and survivors of sexual exploitation and abuse. It

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2 The *Times*, "[Minister orders Oxfam to hand over files on Haiti prostitute scandal](#)", accessed 14 December 2020

is also difficult to estimate how widespread the problem is because there is a lack of robust data on its prevalence, but 73% of individuals who responded to our survey think that the sexual exploitation and abuse of aid beneficiaries is still a problem<sup>3</sup> and recent research published by the Global Women's Institute that looked into the situation in refugee camps in Lebanon and Uganda showed widespread misconduct persisting.<sup>4</sup> In addition, The New Humanitarian and Thomson Reuters Foundation reported in September 2020 that “sex for jobs” practices were taking place with impunity during the 2018–20 Ebola response in the Democratic Republic of The Congo involving personnel from the World Health Organization and other UK funded organisations.<sup>5</sup>

## Our inquiry

6. The focus of this inquiry is the sexual exploitation and abuse that aid beneficiaries suffer at the hands of aid workers. We acknowledge that the sexual harassment and abuse of aid workers is a serious, related topic which must be urgently addressed, but it falls outside of the terms of reference for this inquiry. We are keen to put the victims and survivors of sexual exploitation and abuse at the heart of this report and promote approaches that empower local communities to be involved in aid programmes. Unfortunately, due to the covid-19 pandemic we were unable to undertake any visits to see for ourselves how programmes are delivered in the field.

7. We acknowledge that the overwhelming majority of aid workers undertake remarkable work in challenging circumstances. Most individuals enter the sector due to a desire to help others and we are very proud of the legacy of what UK Aid has achieved. However, sexual exploitation and abuse continues to be a scourge on the sector. This problem should not be seen as a reason to cut aid programmes; however, we will continue to challenge aid delivery organisations to improve their policies and practices to ensure they are doing everything they can to prevent sexual exploitation and abuse from occurring. In some instances, this will require a root and branch transformation of the culture at the organisation.

8. We would like to thank everyone who has contributed to this inquiry, including those who have provided oral and written evidence. We are particularly grateful to those who shared their own personal experience with us. Their testimonies have helped us to better understand the nature of sexual exploitation and abuse in the aid sector. We thank everyone who took our survey, this helped us to prioritise our work and the key results are annexed to this report. Lastly, we would like to thank our special advisers, Dr Miranda Brown, Professor Rosa Freedman and Asmita Naik, who have brought invaluable expertise to this inquiry.

9. \*Most of our written evidence was received before the Department for International Development merged with the Foreign and Commonwealth Office, therefore this report continues to refer to the Department for International Development where it is appropriate to our evidence.

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3 See Annex to this report, page 54

4 The Global Women's Institute, “[Empowered Aid](#)”, Accessed 14 December 2020

5 The New Humanitarian, “[EXCLUSIVE: More than 50 women accuse aid workers of sex abuse in Congo Ebola crisis](#)”, accessed 14 December 2020

## This report

10. Chapters 2, 3, 4, 5 and 7 of this report refer to non-governmental organisations, private sector contractors and FCDO partner organisations. The United Nations is covered separately in Chapter 6, including a section on the Review of Sexual exploitation and abuse by international peacekeepers undertaken by the Independent Commission for Aid Impact. Many of the conclusions and recommendations in this report are aimed at the aid delivery organisations themselves, but, as a donor the FCDO and other official development assistance (ODA) spending departments should hold all their partners to these standards.

## Definitions of sexual exploitation and abuse

11. Sexual exploitation, abuse and harassment covers a wide range of behaviours. We have adopted the definitions used by the UN and the FCDO:

**Sexual Exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. Includes profiting momentarily, socially, or politically from sexual exploitation of another. Under UN regulations it includes transactional sex, solicitation of transactional sex and exploitative relationship.

**Sexual Abuse:** The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It should cover sexual assault (attempted rape, kissing / touching, forcing someone to perform oral sex / touching) as well as rape. Under UN regulations, all sexual activity with someone under the age of 18 is considered to be sexual abuse.

**Sexual Harassment:** A continuum of unacceptable and unwelcome behaviours and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for sexual favours and sexual, verbal or physical conduct or gestures, that are or might reasonably be perceived as offensive or humiliating.<sup>6</sup>

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6 DFID and FCO Guidance, "[Safeguarding against Sexual Exploitation and Abuse and Sexual Harassment \(SEAH\) in the aid sector](#)", updated August 2020



## 2 Reporting mechanisms, investigations and whistleblowing

### Reporting sexual exploitation and abuse

12. Perpetrators of sexual exploitation and abuse can only be punished and prevented from working in the aid sector if their behaviours are known about. It is estimated that sexual offences are underreported in most contexts and aid beneficiaries face significant barriers to reporting, including cultural traditions, gender roles, feelings of shame, weak justice systems and not being properly informed of how they can safely report their case. These factors will vary considerably depending on where they are but, in some locations, women might even fear being accused of adultery if they report sexual abuses committed against them.

13. Our predecessor committee found that the imbalances in power discussed in Chapter three of this report have a significant detrimental effect on the ability of victims and survivors to report their cases.<sup>7</sup> Furthermore, it is intimidating for victims and survivors to report the abuses directly to the perpetrator's employer organisation. Throughout this inquiry we heard about organisations that had introduced reporting mechanisms which were not used by the local population to report abuses, often because they had not been designed in concert with the aid beneficiaries who they were intended for. Independent consultant and PSEA adviser, Esther Dross explained that these organisations need to do more to build the trust of beneficiaries:

I work a lot with small and local organisations, all of which have some kind of reporting mechanism. That is nice, and you think it is a success, but they get no complaints, so there is the big question of how we build trust. They are obviously not adapted. When I ask people, "How did you create this? Did you ask the beneficiaries?" I find that they did not. They have a phone number and an email, and they are happy, but this is not how it works.

In order to encourage people, you need to go out and ask them how they would feel confident. They do not always have very complicated answers, and they often have very simple answers. Then you just need to do it, even if it does not look fancy in a big report. They can be very simple things, but we should be more attentive to the people we work for and who are at the centre of what we do. We need to ask them, for the sake of their own dignity, to decide themselves what the best way is.<sup>8</sup>

14. In its written evidence the Department for International Development (DFID) said its enhanced safeguarding due diligence introduced in 2018 includes a requirement for implementing partners to have a clear process for handling complaints<sup>9</sup> however, our evidence suggests that having mechanisms in place isn't sufficient to help aid beneficiaries to report abuses when they occur.

7 International Development Committee, Eighth Report of Session 2017–19, [Sexual exploitation and abuse in the aid sector](#), HC 840, para 143

8 [Q59](#)

9 [Department for International Development, SEA0015](#)

15. We undertook a survey of individuals with experience of the aid sector to try to understand whether they thought there had been significant progress on tackling sexual exploitation and abuse within their organisation and in the sector as a whole. The results of the survey and the evidence we received suggested that people working in the aid sector do believe there has been some improvement in reporting mechanisms and the number of cases of sexual exploitation and abuse that are reported seems to reflect this. DFID told us that the number of safeguarding cases reported to it increased from 73 in 2017–18 to 260 in 2018–19 and reached 452 in 2019–20, of which around 60% are related to sexual exploitation, abuse and harassment (a similar percentage to 2018/19).<sup>10</sup> However, the consensus is that most of this progress has come from aid workers reporting rather than aid beneficiaries themselves.<sup>11</sup>

### ***Sexual exploitation during the 2018–20 Ebola response in the Democratic Republic of the Congo (DRC)***

16. As early as February 2019, The Guardian reported that concerns about sexual exploitation and abuse taking place in the 2018–20 Ebola response in the Democratic Republic of the Congo were raised at a national taskforce meeting attended by international aid agency and Congolese Health Ministry staff.<sup>12</sup> In September 2020 The New Humanitarian and Thomson Reuters Foundation reported that 51 women had accused men working on the Ebola response in the city of Beni of sexual exploitation and abuse. Most of the men identified worked for the UN World Health Organization (W.H.O), with further perpetrators linked to several non-governmental organisations, including World Vision and Oxfam.<sup>13</sup> Many of the women said the men “had either propositioned them, forced them to have sex in exchange for a job, or terminated their contracts when they refused.”<sup>14</sup> The New Humanitarian reported that it is likely the practice is widespread and that cases occurred as recently as March 2020.<sup>15</sup>

17. Some of the journalists who worked on the investigation in the DRC gave evidence to this inquiry on 13 October 2020. We were particularly shocked to hear that the practice of “sex for jobs” appeared to be an “open secret” among the aid community operating in Beni<sup>16</sup> but workers were not speaking up about it. We were astounded by the level of impunity afforded to the perpetrators that investigative journalist Robert Flummerfelt described:

we conducted interviews with W.H.O drivers, who described being sent in marked W.H.O vehicles to pick up women and ferry them to hotels, where they were abused and exploited. Additionally, there was a case where a woman described being told by a foreigner working with W.H.O, through a translator, that she would have to sleep with him in order to get a job.<sup>17</sup>

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10 [Department for International Development, SEA0015](#)

11 [Oxfam GB, SEA0008](#)

12 [The Guardian, “Ebola vaccine offered in exchange for sex, Congo taskforce meeting told”](#), Accessed 14 December 2020

13 [The New Humanitarian, “EXCLUSIVE: More than 50 women accuse aid workers of sex abuse in Congo Ebola crisis”](#), accessed 14 December 2020

14 [Ibid](#)

15 [Ibid](#)

16 [Q133](#), [Q140](#)

17 [Q145](#)

18. We were particularly disappointed to hear that the victims and survivors told the journalists that they did not know how to report the exploitation and abuse they experienced. Improving reporting mechanisms was one of the key commitments that the international community signed up to at the October 2018 Safeguarding Summit, however Nellie Peyton, West Africa Correspondent at the Thomson Reuters Foundation told us that in Beni:

All of the organisations had in place hotlines, mailboxes, email addresses and various other mechanisms. UNICEF said they had 22 mechanisms in place to receive complaints. None of the women we talked to were aware of this.<sup>18</sup>

19. Robert Flummerfelt explained that the women considered the aid organisations as a single block and felt victimised by the organisations as a whole. The journalists told us that the women spoke to them because they were able to build the trust of the local population. This example is a sobering reminder that for all the warm words and commitments to action the international community has made over recent years, sexual exploitation and abuse is still able to occur with seeming impunity in humanitarian responses. Since The New Humanitarian and Thomson Reuters Foundation reported on these cases in September 2020, the W.H.O has launched an independent commission to investigate the conduct of its employees.<sup>19</sup> Several other organisations named in the media reports have also launched investigations, yet little action seems to have been taken after these concerns were previously raised in February 2019.

**20. Aid organisations must be alert to the barriers that might prevent aid beneficiaries from reporting abuses. They should design sensitive reporting mechanisms with the local population, in order to give victims and survivors, and their families and friends a safe means to report their concerns and complaints. This might include face-to-face reporting if they prefer and will often involve community-based organisations and safe spaces for women to report, without necessarily going through the formal mechanisms set up by the aid providers. These community-based organisations should also be encouraged to hold open and frank conversations with aid beneficiaries about any concerns they have about the aid organisations operating in the area, to encourage them to open up about the experiences they have had.**

## Investigations

21. Witnesses told us that there is a feeling that even if cases of sexual exploitation and abuse are reported, aid organisations are reluctant to undertake thorough investigations into the matter and punish the perpetrator appropriately if the complaint is upheld.<sup>20</sup> Our predecessor committee found that often organisations were more concerned about protecting their own reputations than taking effective measures to stamp out sexual exploitation and abuse and that these decisions are made in a “macho” environment.<sup>21</sup> The culture of the aid sector is discussed in Chapter four of this report. The absence of robust investigations has led to a lack of trust in the humanitarian community and prevents aid

18 Ibid

19 Thomson Reuters, “[WHO names independent body to investigate Congo sex abuse claims](#)”, accessed 14 December 2020

20 Eg, [Q145](#)

21 International Development Committee, Eighth Report of Session 2017–19, [Sexual exploitation and abuse in the aid sector](#), HC 840, paras 46 & 217–218

beneficiaries from reporting cases. Robust investigations into cases of sexual exploitation and abuse are key to catching perpetrators, punishing them, and removing them from the aid sector. This will help to provide justice to victims and survivors and act as a deterrent to other perpetrators.

22. We continue to have concerns that if a perpetrator resigns before an investigation has taken place then the case will not be followed-up and their misconduct will not be properly recorded. Aid organisations should ensure that an outcome is reached on the balance of probability and shared with the victim, even if no further action can be taken. Furthermore, it is not enough for aid organisations to report abusers to the local police or law enforcement agency and consider the matter closed. No matter whether the perpetrator is an international aid worker, or it is someone who has been hired in-country, the aid organisation should follow-up on the investigation to ensure an appropriate outcome is reached. Often cases will not have a criminal outcome, but a disciplinary process would still be appropriate. It is crucial that this information is captured and recorded.

### Progress made to improve reporting and investigations

23. Since 2018 DFID has funded Proteknon Consulting Group, LLC to develop a report handling toolkit for the aid sector. It was published by Bond in 2019 and includes 20 core elements to strengthen safeguarding report-handling.<sup>22</sup> The safeguarding working group on reporting and complaints mechanisms which is coordinated by Bond, has published further resources, including a set of case studies that illustrate how these elements can be practically applied in different situations. It has also published a set of safeguarding definitions, and guidance on safeguarding governance for trustees.<sup>23</sup> In its written evidence DFID said that it has introduced language in its funding agreements requiring partners to report cases to it.<sup>24</sup> The Safeguarding Investigations Team (SIT) checks that reports are acted on and dealt with. DFID also committed to continuing to work with its partners across the sector to improve their investigation and disciplinary processes. Furthermore, it said it has plans to fund work over the next three years to build the skills of first responders and investigators to better ensure safe and sensitive handling of cases.<sup>25</sup>

24. Written evidence from Oxfam GB said the organisation has been on a journey of improvement with regards to handling sexual exploitation and abuse. It set out what it has found to be the key elements to a quality and safe response to cases:

Our experience is that the key to consistent, quality and safe response to SEA allegations is to ensure that (i) standard operating procedures for managing cases are in place and are consistently implemented by people with the right capabilities and capacity to do so; (ii) local referral pathways, labour laws, and legal frameworks are clearly mapped out in all the countries where we work so that we can act appropriately and as swiftly as possible when a case is reported; and (iii) all staff who interact directly with community members and/or who might receive complaints are trained on how to respond and how to report. Additionally, having experienced SEA investigators who can be swiftly deployed and provide safeguarding support in regions and countries is an essential aspect of survivor-centred case management.<sup>26</sup>

22 [“20 core elements: a toolkit to strengthen safeguarding report-handling”](#), published by Bond, 2019

23 [Bond, SEA0013](#)

24 [Department for International Development, SEA0015](#)

25 [Ibid](#)

26 [Oxfam GB, SEA0008](#)

25. However, Lesley Agams, a writer, lawyer and social entrepreneur from Nigeria reminded us that any new policies and processes must be designed in conjunction with people based locally if they are to be effectively implemented in the contexts in which they are designed to be used:

When I discuss the matter with my African feminist sisters, we still agree on one thing: the reason why a lot of these policies are not implemented is because they are produced in London and somebody gives country directors in various African countries literally a checklist of, “Do this, this and this.”<sup>27</sup>

26. **We hope work to improve investigations at UK ODA receiving partners will continue under the merged FCDO in a way that encourages participation of the local population in the process. However, the culture of the sector (described in Chapter 4 of this report) is also key to ensuring that robust investigations are undertaken and complaints against perpetrators are upheld.**

27. *The FCDO should adopt the practices developed by DFID to improve investigations, including incorporating a requirement to report cases to the FCDO into funding agreements with partners. The Safeguarding Investigations Team should continue to check that reports of sexual exploitation and abuse are satisfactorily managed; and it should take-up the work proposed by DFID to improve the skills of first responders and investigators.*

## Employment cycle schemes for preventing perpetrators

28. The UK Government has concentrated a significant amount of its international safeguarding efforts towards supporting employment cycle schemes that are designed to prevent perpetrators of sexual exploitation and abuse from being re-hired within the sector. This is an important issue which needs to be addressed if we are to combat sexual exploitation and abuse. We note that in August 2020 DFID said the Misconduct Disclosure Scheme which helps aid organisations to share misconduct information about staff had already been used in over 3,000 recruitments and 34 individuals had been rejected due to information that was shared through the Scheme since it was launched in January 2019.<sup>28</sup> However, the Misconduct Disclosure Scheme, as well as the INTERPOL supported Project Soteria, and the Aid worker Registration Scheme all rely on the perpetrator being reported, and an effective investigation being undertaken in order for accurate information about their behaviour to be shared.

29. **The work undertaken by the UK government and the sector as a whole to improve reporting and investigations and provide additional guidance is welcome, however, the lack of capacity in the sector and absence of common standard for investigations means that the outcomes of investigations are unreliable. Therefore, there is a risk that the employment cycle schemes could be used to retaliate against people who raise legitimate concerns and they might fail to properly identify and prevent the re-employment of perpetrators.**

30. **Employment cycle schemes which are designed to prevent perpetrators of sexual exploitation and abuse from being re-hired in the aid sector will only work if**

27 [Q127](#)

28 [Department for International Development, SEA0015](#)

perpetrators are reported and robust investigations undertaken. Therefore, improving reporting and investigations should be prioritised. *The FCDO should support initiatives to increase investigations capacity in the aid sector and work with its partners to ensure that the employment cycle schemes incorporate checks and balances to ensure they are just and fair to survivors and aid workers.*

31. *The FCDO should undertake a review of the cost and likely effectiveness of the employment cycle schemes at preventing perpetrators of sexual exploitation and abuse from being re-employed in the aid sector.*

## Whistleblowing

32. In its initial report into Sexual exploitation and abuse in the aid sector, our predecessor committee set out how important whistle-blowers have been in publicising sexual exploitation and abuse in the aid sector, which in turn, galvanised efforts to combat it. The Committee also raised significant concerns about the retaliation that aid workers who blew the whistle on misconduct have faced.<sup>29</sup> Sally Proudlove, Co-Chair of the NGO Safeguarding Working Group on Leadership and Culture, told us that if someone has to whistle-blow then it signals there is a wider problem internally, which means the individual hasn't been able to raise their concerns through normal reporting routes.<sup>30</sup> Considerable effort has gone into ensuring that aid organisations have whistleblowing practices and procedures in place, but it is less clear whether staff have the confidence to use them. Sally Proudlove explained:

There can be a disproportionate amount of security given, where we feel that we have the policy in place and we have ticked that box. From so much of what we have seen in the sector, I do not think the problems we have are for a lack of policies and procedures. Lots of the organisations that we operate in have lots of safeguarding and whistleblowing policies and procedures. We want to see what difference those are actually making and to help organisations understand the jump from compliance to culture and that those are two different things.<sup>31</sup>

33. A majority of the individuals who responded to our survey told us that they believe their organisation has adequate policies and practices in place to protect whistle-blowers and others who speak up about sexual exploitation and abuse perpetrated by aid workers. An even greater number said they have knowledge of the policies and practices in place; however, 57% of individuals who said they had tested the whistleblowing practices at their organisation found the policies and practices had been inadequate. Several organisations expressed in their written evidence that they have strengthened their whistleblowing policies,<sup>32</sup> however, it is important that the FCDO does not just check whether its implementing partners have whistleblowing policies on paper; it should seek to understand how those policies are understood and used by staff. It needs to know whether staff feel they would be supported if they decided to blow the whistle.

29 International Development Committee, Eighth Report of Session 2017–19, [Sexual exploitation and abuse in the aid sector](#), HC 840, page 5

30 [Q40](#)

31 [Ibid](#)

32 Eg. [International Committee of the Red Cross, SEA0018](#), [Save the Children, SEA0006](#)



34. Former Secretary of State for International Development, Rt Hon Penny Mordaunt announced several measures that organisations who attended the March 2018 Safeguarding Summit agreed to. These measures included “to plan for a systematic audit of whistleblowing practices across the sector to ensure individuals feel able to report offences.”<sup>33</sup> However, in its response to our predecessor’s most recent report on sexual exploitation and abuse, DFID said it had not agreed to the audit:

We agree that protection for whistle-blowers should form part of all frameworks for reporting sexual exploitation, abuse and harassment of both beneficiaries and staff. The March Summit did highlight the importance of support to whistle-blowers, but without agreeing to a systematic audit of whistleblowing as suggested by the report.<sup>34</sup>

35. Instead, DFID pointed towards the central safeguarding enhanced due diligence assessments of 31 of its delivery partners undertaken by Keeping Children Safe (KCS) and told us it would publish a synthesis of the main findings of the assessments later in the year. A summary of the findings was published in June 2020 and is described in more detail in Chapter six of this report. With regards to whistleblowing, the KCS found:

- External support and advice for whistle-blowers is rarely signposted by organisations;
- there is a need to adapt reporting mechanisms to local contexts to ensure they are appropriate and accessible for all stakeholders;
- Whistleblowing policies need to be made available to all, including partners and beneficiaries as well as staff.<sup>35</sup>

As a result of the recommendations that came out of the assessments two more partners decided to make it obligatory for staff to raise safeguarding concerns.<sup>36</sup>

36. We note that the FCDO did not include any information on whistleblowing in its Progress Report on Safeguarding Against Sexual Exploitation, Abuse and Sexual Harassment (SEAH) in the International Aid Sector, 2019–20, published in October 2020<sup>37</sup> despite its inclusion in the donor commitments that the Government signed up to in 2018.<sup>38</sup> The progress update should track actions taken against all the donor commitments to aid transparency.

**37. A full and transparent audit of whistleblowing in the aid sector has still not taken place. The FCDO should undertake an audit to provide a full understanding of how whistleblowing practices are being implemented and used, to give confidence that whistle-blowers are actively supported and not retaliated against by their organisations.**

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33 Department for International Development, [“Actions to tackle exploitation and abuse agreed with UK charities”](#), 5 March 2018

34 International Development Committee, First Special Report of Session 2019–20, [Follow up: sexual exploitation and abuse in the aid sector: Government Response to the First Report of the Committee](#), HC127, page 4

35 [“Summary of Findings from KCS Central Assurance Assessments of DFID Partners”](#), published by the Department for International Development, July 2020

36 [Ibid](#)

37 Foreign, Commonwealth and Development Office, Impact Assessment, [FCDO Progress Report on Safeguarding Against Sexual Exploitation, Abuse and Sexual Harassment \(SEAH\) in the International Aid Sector, 2019–20](#), 20 October 2020

38 [“Commitments made by donors to tackle sexual exploitation and abuse and sexual harassment in the international aid sector”](#), published by the Department for International Development, October 2018

38. **An audit will also help the FCDO along with other donors to hold aid organisations accountable for their treatment of whistle-blowers. The results of an audit could help donors to develop incentives for managers to encourage effective reporting on standards of conduct.**

## Nondisclosure agreements

39. Recent media reports have raised concerns that non-disclosure agreements (NDAs) are being used in the aid sector to silence allegations of misconduct.<sup>39</sup> In her oral evidence to this inquiry independent consultant, Dr Miranda Brown said that NDAs are a disincentive to disclosing abuse:

We have cases of aid workers who have been pushed out their organisations and forced to sign non-disclosure agreements. We know that survivors and victims have also been compelled to sign non-disclosure agreements. In situations like that, there is a real disincentive to disclosing abuse. There is no contractual protection. Aid workers who fall under UK law have some measure of protection, but the vast majority do not.<sup>40</sup>

40. According to an article published by Devex in September 2020, experts said that NDAs are becoming more common in employment contracts with development organisations, and are sometimes used in termination settlements, but it is difficult to assess how common they are.<sup>41</sup> The CHS Alliance, an international membership organisation for the aid sector, published a set of guidelines on the use of NDAs after receiving inquiries about whether they are in line with the Core Humanitarian Standard. The guidelines suggest that NDAs are often used lawfully by employers to protect confidential information.<sup>42</sup> When we asked Tanya Wood, CEO of the CHS Alliance about the use of NDAs and the guidance the Alliance had published, she told us:

We put out the guidance in order to put this in the context that this is about the cover-up of power abuses. They can never, ever be used to cover up power abuses. They can only be used if it right for the victim or the survivor.<sup>43</sup>

41. **We are concerned that the use of non-disclosure agreements in the aid sector could be used to cover-up misconduct and will exacerbate power imbalances. As part of its due diligence processes the FCDO should require organisations it funds to report to it the number of non-disclosure agreements they have signed, to help the FCDO to ensure that its partners are not misusing NDAs to silence individuals who raise legitimate concerns.**

## Data

42. As noted earlier in this Chapter, DFID told us that the number of safeguarding cases reported to it increased from 73 in 2017–18 to 260 in 2018–19 and reached 452 in 2019–20, of which around 60% are related to sexual exploitation, abuse and harassment.<sup>44</sup> However,

39 Devex, [“NGOs accused of hiding misconduct behind gag orders”](#), accessed 14 December 2020

40 Q5

41 Devex, [“NGOs accused of hiding misconduct behind gag orders”](#), accessed 14 December 2020

42 Ibid

43 Q97

44 [Department for International Development, SEA0015](#)



it is impossible to know what the overall scale of the problem is. Witnesses told us that understanding the scale of the problem is crucial for assessing whether measures taken are working,<sup>45</sup> otherwise we are reliant on anecdotal evidence and scandals breaking in the media before we know where it is occurring. In its written evidence Bond said it would also be helpful to know the extent to which lower level safeguarding concerns are reported, because this can indicate how much of a positive ‘speak up’ culture exists.<sup>46</sup> This data is not currently collated across the sector. Aid organisations that participated in the March 2018 Safeguarding Summit agreed that safeguarding case data should be published in their annual reports.<sup>47</sup> In July 2018 the IDC recommended that aid organisations should report annually the total number of allegations received and the number that are upheld,<sup>48</sup> but this does not appear to have happened across the board. In its Progress Report on Safeguarding Against Sexual Exploitation, Abuse and Sexual Harassment (SEAH) in the International Aid Sector, 2019–20 the FCDO set out its plans to improve data collection across the aid sector:

Under-reporting by survivors and many organisations’ reluctance to publish information on the number and types of allegations received through reporting channels hampers efforts to analyse trends and effectively support prevention and response efforts. The FCDO will work with its partners in the coming year to explore ways to improve data collection, data management and reporting systems, with the aim of improving coherence, transparency and accountability in tackling SEAH and supporting victims and survivors.<sup>49</sup>

**43. We welcome the plans that the FCDO has to improve data relating to sexual exploitation and abuse in the aid sector. We believe this is a key step to understanding the scale of the problem and will enable the international community to better evaluate efforts taken to combat sexual exploitation and abuse. *To facilitate the collection of data, the FCDO should make it clear to its partners that reporting cases of sexual exploitation and abuse will not be treated as a reason to be penalised, as long as they can demonstrate that they have robust mechanisms in place to deal with the misconduct. FCDO partners should report annually their total number of safeguarding allegations they receive and the number that are upheld.***

45 Eg. Professor MacLeod, [Q105](#), Minister Cleverly, [Q245](#)

46 [Bond, SEA0013](#)

47 Department for International Development, [“Actions to tackle exploitation and abuse agreed with UK charities”](#), 5 March 2018

48 International Development Committee, First Report of Session 2019, [“Follow-up: sexual exploitation and abuse in the aid sector”](#), HC 111, para 40

49 Foreign, Commonwealth and Development Office, Impact Assessment, [FCDO Progress Report on Safeguarding Against Sexual Exploitation, Abuse and Sexual Harassment \(SEAH\) in the International Aid Sector, 2019–20](#), 20 October 2020

### 3 Support for victims and survivors

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#### Types of support for victims and survivors of sexual exploitation and abuse

44. Throughout this inquiry we have heard that a victim and survivor led approach is needed. Ensuring that support is available to victims and survivors when they experience exploitation and abuse, and that they know how to access it, is crucial to this. Sexual exploitation and abuse do not occur in a vacuum and often occur in a context where other forms of gender-based violence takes place. Victims and survivors of all forms of gender-based violence should have access to the support they need.

45. Support should be offered confidentially if this is the preference of the survivor and provision should be designed with the local population to ensure it is sensitive to local needs. The types of support that victims and survivors require will depend on the person and the context in which the exploitation or abuse occurred. Typical forms of support for victims of gender-based violence include psychological support, access to health services, case management and childcare. Victims and survivors might also need legal assistance if they wish to pursue legal justice. Alina Potts is a research scientist at The Global Women's Institute, and she explained that providing this support can encourage victims and survivors to come forward and share more detail about the sexual exploitation and abuse they have experienced, however, she warned that access to support should not be contingent on their reporting specific instances of abuse.<sup>50</sup> West Africa Correspondent at Thomson Reuters Foundation, Nellie Peyton agreed that providing these services can help to incentivise victims and survivors to come forward and she told us that the services should be set up in advance of abuses being reported.<sup>51</sup>

46. In its written evidence to our inquiry Oxfam stressed that gender-based violence (GBV) services are an essential part of effective response to sexual exploitation and abuse. Oxfam recommended that survivors should be referred to existing GBV support services in their own communities, to provide a culturally sensitive response unless a survivor wants to be relocated.<sup>52</sup> However, Oxfam acknowledged that in many locations these services are lacking. It suggested that the Foreign, Commonwealth and Development Office (FCDO) should increase its investment in gender-based violence services to ensure that survivors have access to assistance.<sup>53</sup> Stephanie Draper CEO of Bond reiterated that women's groups on the ground are well placed to support survivors and she said that there is a need to fund the work of women's and child's rights organisations that address all forms of gender-based violence.<sup>54</sup> This is something that the FCDO should consider as part of its broader work on violence against women and girls.

47. Currently, different aid organisations take varying approaches to how they help victims and survivors to access the support they need. In its written evidence, Sightsavers told us that it undertakes mapping of services available in all the countries in which it operates.<sup>55</sup> It said that that it will fund support services for individuals in cases where

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50 [Q4](#)

51 [Q149](#)

52 [Oxfam GB, SEA0008](#)

53 [Ibid](#)

54 [Q208](#)

55 [Sightsavers, SEA0002](#)

the organisation has established a duty of care towards the survivor, for example, if they have suffered abuse by one of its staff members. Sightsavers said they also consider the support needs of other people involved, including families, team members and partner staff, and where possible, it will combine support provision with other organisations who may be involved in the concern.<sup>56</sup> Save the Children said it has produced a protocol, which outlines its approach to supporting anyone who raises a concern about exploitation and abuse. This includes allocating a Wellbeing Advisor to support them for the duration of any investigation and beyond.<sup>57</sup> In addition, Save the Children said the Wellbeing Team is available to support any adult victim or survivor, regardless of whether they wish to participate in an investigation process and will help them to access the services they need.<sup>58</sup>

48. The Central Assurance Assessments of 31 DFID partner organisations undertaken by Keeping Children Safe which are explained in detail in Chapter 5, identified several recommendations relating to improvements to support for victims. As a result of these recommendations 29 organisations are:

strengthening procedures to support victims and survivors, to improve trust, integrity, confidentiality and prevent further harm.<sup>59</sup>

This indicates that this is an area in which majority of aid organisations can improve. Independent safeguarding consultant, Lucy Heaven Taylor stressed to us that support for victims and survivors should take a long-term approach.<sup>60</sup> Victims and survivors will not access all services immediately so organisations need to consider how ongoing support will be provided, particularly in humanitarian responses where the situation might be changeable:

In terms of support generally to victims and survivors who come forward, there needs to be a recognition that it is not a case of us spamming them with all the support services that are available to them when they first come forward—although we obviously do provide support straight away—but that this is really a long-term engagement. Many survivors do not access support, certainly within the first three months after coming forward. It might be several years down the line.<sup>61</sup>

49. **It is imperative that aid beneficiaries who become victims and survivors of sexual exploitation and abuse have access to the support and services they need, and they are informed how to safely use them. The potential need to provide these services should be factored in from the start of programmes, including at the planning stage. The FCDO should include the cost of supporting victims and survivors in grants and contracts for running programmes that it funds. The UK should work in partnership with victims and survivors to deliver the support they need, engaging with community-based organisations in country, to provide services to victims and survivors and providing funding and training if these are requested by those organisations. The FCDO should place requirements on its implementing partners to ensure that victims and survivors have free and safe access to the support and services they need and this support is not**

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56 [Ibid](#)

57 [Save the Children, SEA0006](#)

58 [Ibid](#)

59 [“Summary of Findings from KCS Central Assurance Assessments of DFID Partners”](#), published by the Department for International Development, July 2020

60 [Q62](#)

61 [Ibid](#)

*conditional on following a formal complaints process.*

## Access to justice

50. We heard differing views on how much effort the international community should devote to seeking criminal justice for victims. Not all forms of sexual exploitation and abuse will reach the criminal threshold, and some argue it's not helpful to concentrate on this aspect specifically. Furthermore, the justice systems in the countries where aid organisations operate vary significantly.

51. When we asked independent consultant, Esther Dross whether victims and survivors can access legal support, she told us that it depends on the organisation and on the country. She said in some countries it is very difficult to identify what legal support you could get and for some it could be impossible.<sup>62</sup> However, Lesley Adams, a lawyer, writer and social entrepreneur based in Nigeria warned against assuming that support will not be available in-country, instead she told us that local providers should be supported and strengthened:

Every single country in west Africa has some sort of infrastructure for the judicial resolution of sexual assault and sexual harassment. Many local organisations whose work it is to ensure that victims are supported through the process do not feel included and have not been consulted, and there is that huge gap.<sup>63</sup>

She told us that in her experience of working for Oxfam, safeguarding officers were not required to report to the local authorities. Instead, they reported to a regional safeguarding officer, which completely bypassed the local authorities. She recommended that the FCDO do more to build capacity at existing organisations who are working on the ground to support victims of rape and sexual assault and to increase prosecutions.<sup>64</sup>

52. Several witnesses also said the FCDO should use its position to work with countries that receive UK aid to help strengthen their justice mechanisms and provide better legal support for victims and survivors.<sup>65</sup> International Justice Mission (IJM) has a team of lawyers, social workers and investigators who partner with governments and local authorities to help combat violence and exploitation in 13 countries. IJM said that in its experience the prevalence of abuse falls dramatically when local law enforcement agencies are trained and equipped to protect survivors and proactively hold perpetrators of violence to account.<sup>66</sup> The experience that IJM gives a useful demonstration of how local law enforcement can be mobilised and strengthened to combat exploitation and abuse.

**53. Although the aid sector faces additional challenges due the international nature of many of its perpetrators, the FCDO can use the experience of International Justice Mission to help inform how it can better support countries to strengthen their local justice mechanisms and ensure that survivors have confidence in local authorities to restrain their abusers and offer meaningful protection.**

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62 [Q62](#)

63 [Q127](#)

64 [Ibid](#)

65 Eg. [International Justice Mission, SEA0012, Q177](#)

66 [International Justice Mission, SEA0012](#)

## FCDO support

54. We considered the possibility of having an Independent, International Victims Commissioner based at the FCDO to support victims of British perpetrators, but the FCDO Minister with responsibility for safeguarding, Rt Hon James Cleverly MP raised reservations about the idea:

my concern about having this point is that it is not always easy for the victims of this to find a way of contacting the UK directly. We want to make sure that they have multiple routes for reporting.<sup>67</sup>

55. The Head of the FCDO's safeguarding Unit, Peter Taylor said that people can report to the department by phone or email, or indirectly if people do not have access to those methods. He said the FCDO feels that it should concentrate on country level provisions:

the best route forward is to try to strengthen local national-level accountability and reporting mechanisms, rather than suggesting that somehow this should sit in FCDO [...] with this new programme we will be looking to improve access to reporting for victims, survivors and whistleblowers, improve investigations of any allegations and make sure that the support services they require are better.<sup>68</sup>

During the Westminster Hall Debate on 4 November 2020 on Sexual Abuse and Exploitation Minister Cleverly announced that new support for victims and survivors is in the pipeline:

Following wide consultation, we have designed a new multi-million-pound programme of support to survivors and victims. We will provide further details in 2021.<sup>69</sup>

**56. We welcome the Minister's announcement of new support for victims and survivors and we ask that he provides this Committee with an update on that programme of support once further details are available. We agree with the approach that the FCDO says it is taking to work with and strengthen in-country justice mechanisms. However, we believe it might be helpful for some victims and survivors to be able to contact UK systems directly. Embassy and High Commission staff already have experience of working with the local justice systems in the countries where they are based, through helping British nationals to navigate them. This experience could be used to help support victims and survivors of sexual exploitation and abuse where the perpetrator was British or employed by a British aid organisation.**

***57. The FCDO should consider how it can join-up its diplomatic and aid functions to better support victims of sexual exploitation and abuse. UK High Commissions and Embassies in countries that receive UK Aid should develop the capacity to provide support to victims and survivors of sexual exploitation and abuse where the perpetrator was British or employed by a British aid organisation. In particular, they should use their experience and contacts to help the victims and survivors to navigate the local legal system, where applicable.***

67 [Q273](#)

68 [Q273](#)

69 HC Deb, 4 November, [col 139](#) [Westminster Hall]

## Legislation

58. Our predecessor committee suggested new legislation could be used to prosecute aid workers who commit sexual offences overseas. It drew up a Draft International Development (Safeguarding Vulnerable Groups) Bill which was introduced, with leave of the House, on 4 July 2018, by the Chair of the Committee under the Ten Minute Rule (Standing Order No. 23).<sup>70</sup>

59. Witnesses to this inquiry told us that the UK could do more to use existing legislation to prosecute perpetrators of sexual exploitation and abuse that breach the criminal threshold. Section 72 of the Sexual Offences Act 2003 allows individuals to be prosecuted in the UK for child sex offences overseas, however, it is very rarely used. Professor Andrew MacLeod, Co-Founder of Hear Their Cries argued that this legislation could be used to prosecute British aid workers. He also brought to our attention the Australian legislation which makes it a criminal offence not to report a child sex offence that has taken place overseas, and recommended the UK seek to replicate this provision.<sup>71</sup> The Domestic Abuse Bill 2019–21 is currently progressing through the House of Lords and includes provisions relating to offences against the person committed outside the UK under sections 66 to 68.<sup>72</sup>

**60. *The Government should consider how the provisions included in sections 66 to 68 of The Domestic Abuse Bill 2019–21 could be applied to aid workers who commit sexual offences against adults overseas. It should also seek to use existing legislation to prosecute British aid workers who commit offences against children, as this would provide a strong deterrent.***

70 International Development Committee, Eighth Report of Session 2017–19, [Sexual exploitation and abuse in the aid sector](#), HC 840, Annex 3

71 [Kings College London, Griffin Law, and Hear Their Cries, SEA0011](#)

72 [HL Bill 124](#), Domestic Abuse Bill 2019–21



## 4 Power dynamics and culture

### Power dynamics

61. Our predecessor committee explained in its 2018 report into Sexual exploitation and abuse in the aid sector, how gender inequality and patriarchy have contributed to enabling sexual exploitation and abuse to persist.<sup>73</sup> Extreme power imbalances are typical of the aid sector and the inequality is most stark in humanitarian crises, where the local population is often reliant on aid provided by international organisations to meet even their most basic needs. Frequently in these situations opportunities for paid employment are scarce, the local population is living in poverty and beneficiaries are vulnerable to predators who abuse their power and resources to exploit them. It is critical that aid organisations are alert to these power dynamics, the risks to beneficiaries they pose, and they should take steps to mitigate these risks.

62. Aid organisations should seek to mitigate the power imbalances through better engagement with the local population. Several witnesses told us that aid beneficiaries—particularly women—are not involved in or consulted enough in the planning and delivery of aid. Rosa Freedman, Professor of Law, Conflict and Global Development at the University of Reading School of Law explained why it is important to involve beneficiaries from the start:

If you do not involve aid recipients, survivors and victims in designing programmes and the delivery of programmes, you have no hope in involving them in designing reporting mechanisms, or one-stop shops for support, or anything else they will need.<sup>74</sup>

63. Aid organisations can also reduce the risk of beneficiaries being sexually exploited by ensuring they are well informed of their rights and entitlements. Alina Potts of the Global Women’s Institute told the Committee that on several occasions women who reported sexual exploitation and abuse later discovered they were being offered aid they were already entitled to.<sup>75</sup> “Information is power” and essential information should be shared in a way that is transparent, gender sensitive and takes into account different types of literacy. The best way to communicate this type of information will be context specific and methods should be designed in cooperation with the local population.<sup>76</sup>

64. Stephanie Draper, CEO of Bond acknowledged the power inequalities in the sector. She told us that measures for prevention in the long term include building trust on the ground and ensuring that women’s and children’s rights groups are supported to make everyone aware of their rights and how to complain. Writer, lawyer and social entrepreneur, Lesley Agams recommended that humanitarian aid distribution should be delegated to women and women’s organisations, in order to decrease opportunities for women to be subjected to transactional sex.<sup>77</sup>

73 International Development Committee, Eighth Report of Session 2017–19, [Sexual exploitation and abuse in the aid sector](#), HC 840, para 143

74 [Q18](#)

75 [Q4](#)

76 [Ibid](#)

77 [Q127](#)

65. Aid organisations should try to design programmes in cooperation with the local populations where the programmes will be delivered. They should also take responsibility for ensuring that aid beneficiaries are fully informed of their rights and know what is and what is not acceptable behaviour by aid workers. They might disseminate this information themselves with cooperation from the local population, or work with local women's rights organisations to share the information. Either way, it must be shared in a sensitive and context specific manner. Access to this information will empower women and help them to make informed decisions. *The FCDO should prioritise organisations that demonstrate active engagement with local populations when it is tendering for aid delivery contracts.*

### Covid-19

66. There are serious concerns that the covid-19 pandemic and measures taken to contain it could exacerbate the vulnerabilities faced by aid beneficiaries. In July 2020 Alina Potts told this inquiry:

food rations have been minimised in Uganda and other places. A lot of funding is moving to the covid-19 pandemic response and moving away from things like gender-based violence services. We have communities that have maybe less access to aid and it is harder for them to travel and to move around. There is a lot of fear. There is fear even going to access aid.<sup>78</sup>

67. The reduction in aid will make women more vulnerable to exploitation. Furthermore, many safe spaces where women access services or receive confidential support have either closed down or can only be accessed by mobile phone. Many women and girls do not have access to these mobile services.<sup>79</sup> However, with many of the international organisations having reduced their personnel in-country, this might be a good opportunity for community-based organisations to take control in a more locally led approach.

68. It is important that the international aid sector recognises the risks that the covid-19 pandemic and measures taken to contain it pose to women. Any reduction in aid supplies will make them more vulnerable to exploitation and abuse and should be avoided. This comes at the same time that safe spaces and confidential services for women are becoming more difficult to access. *International aid organisations should work with local, community-based organisations in-country to continue to provide gender-based support and access to services throughout the covid-19 pandemic. This should be taken as an opportunity to consider how these services can be more locally led in future too.*

### Derogatory attitudes and discrimination

69. Throughout this inquiry witnesses told us that the culture of the aid sector has played a central role in preventing aid workers from speaking up and reporting misconduct perpetrated by their colleagues. This has helped sexual exploitation and abuse of aid beneficiaries to persist. Our predecessor committee heard that responsibility for setting an ethical, value-based organisational culture falls to the leaders at the top.<sup>80</sup> Actions

78 [Q8](#)

79 [Q8](#)

80 International Development Committee, Eighth Report of Session 2017–19, [Sexual exploitation and abuse in the aid sector](#), HC 840, para 227



taken towards this goal and progress achieved will be explored later in this Chapter, however, our evidence suggests that in order to combat sexual exploitation and abuse, intersecting issues relating to gender expression, ethnicity, religious affiliation, disability, sexual orientation and age also need to be addressed.<sup>81</sup> We heard that the humanitarian aid sector is predominantly male. Paisley Dodds, Investigations Editor at The New Humanitarian told us that during the 2018–20 Ebola response in the DRC, 80% of World Health Organization (W.H.O) employees were men.<sup>82</sup> Sally Proudlove, Co-Chair, NGO Safeguarding Working Group on Leadership and Culture articulated that working in a way that is genuinely anti-racist and addresses gender power-dynamics will be interlinked with improving safeguarding culture.<sup>83</sup>

70. Activist, writer and Co-Founder of NGO Safe Space, Alexia Pepper de Caires told us the aid sector harbours a “white-saviour complex” and it doesn’t acknowledge the harm inflicted on beneficiaries because it believes its work is carried out “in the interests of doing good”.<sup>84</sup> Other witnesses told us that they had experienced sexist, racist and neo-colonial attitudes by aid worker colleagues. Journalist and Co-Founder of NGO Safe Space, Shaista Aziz described her experience of being targeted for her intersecting identities as a hijab wearing Muslim woman. She told us:

From my experiences, casual bullying in the office and belittling of women in particular are at the heart of what goes on, and everything then stems from that. I have been subjected to very casual levels of racism and daily micro-aggressions in the offices where I have worked.<sup>85</sup>

Shaista indicated that these issues link back to the power dynamics of the sector, telling us: “Misogyny, racism, sexism, sexual exploitation and abuse are about power.”<sup>86</sup> While it was not the focus of this inquiry, the treatment of some aid staff by their co-workers demonstrates the need for a more inclusive and value-based culture.

71. The recent ‘Me too’ and ‘Black Lives Matter’ social movements have demonstrated the pervasiveness of these discriminatory attitudes throughout society. Deputy Africa Editor at The New Humanitarian, Philip Kleinfeld explained how discriminatory attitudes may have contributed to media reporting during the 2018–20 Ebola response in the Democratic Republic of the Congo. He told us that some of the journalists who reported on the situation repeated the narrative put out by aid organisations operating there and the western media published stories deriding the local population for attacking the aid workers. We now have a much clearer understanding that sexual exploitation and abuse was an “open secret” during the response. This suggests that it was tolerated rather than challenged by aid workers, which might explain, in part, why the local population were suspicious of the aid workers and reacted in the ways they did. Philip Kleinfeld described the situation as he observed it:

The foundational principle of the Ebola response was that you had, on the one hand, this group of responders from the W.H.O to all the NGOs who were the heroes and, on the other hand, you had this irrational and

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81 [Chemonics international, SEA0010](#)

82 [Q151](#)

83 [Q32](#)

84 [Q127](#)

85 [Q126](#)

86 [Q129](#)

unreasonable group of Congolese residents who were launching all of these attacks, did not believe Ebola was real and thought it was some kind of conspiracy.<sup>87</sup>

**72. It is important that aid organisations promote diversity and inclusion, including recruiting greater numbers of women and minority ethnic staff to senior leadership roles, to challenge and overcome discriminatory attitudes and cultures that permit sexual exploitation and abuse to perpetuate as occurred during the 2018–20 Ebola response in the DRC.**

**73. Aid organisations must acknowledge the extreme power imbalances that have been a feature of the sector and design their programmes in a way that empowers beneficiaries. *Managers should be held responsible for instilling an open and inclusive culture at their organisation that is actively anti-racist, where all staff are valued and safeguarding against sexual exploitation and abuse is ingrained in its daily operations. They should be reprimanded when it is clear this hasn't happened.***

## Action taken to improve organisational culture

74. Our predecessor committee acknowledged the difficulties in influencing organisations involved in the whole supply chain, and contractors on the ground in aid settings,<sup>88</sup> however, it was clear that aid organisations should do what they can to build an open and inclusive culture that encourages speaking up against perpetrators of sexual exploitation and abuse throughout the sector. This was one of the main themes of the October 2018 Safeguarding Summit hosted by the UK Department for International Development (DFID), during which over 500 aid actors signed up to public commitments including some relating to improving workplace culture.<sup>89</sup>

75. DFID's written evidence to this inquiry explained that numerous aid organisations have subsequently appointed safeguarding leads and champions and they have trained their staff to help drive positive cultural change.<sup>90</sup> DFID contributed to six safeguarding conferences with participants from across the sector, to focus on safeguarding culture. The UK also co-chaired the process that culminated in 30 major donors agreeing the Organisation for Economic Co-operation and Development, Development Assistance Committee (OECD DAC) Recommendation on Ending Sexual Exploitation abuse and Harassment, in July 2019.<sup>91</sup> The Department for International Development told us that it ensured that fostering improved organisational culture and norms featured prominently in the Recommendation.<sup>92</sup>

76. Oxfam was widely criticised in our predecessor committee's first report on Sexual exploitation and abuse in the aid sector, for its poor handling of sexual abuses which took place during the humanitarian response to the 2010 earthquake in Haiti.<sup>93</sup> In June 2019 the Charity Commission concluded its inquiry into Oxfam GB, finding it had a "culture of

87 [Q144](#)

88 International Development Committee, Eighth Report of Session 2017–19, [Sexual exploitation and abuse in the aid sector](#), HC 840, para 124

89 [Department for International Development, SEA0015](#)

90 [Ibid](#)

91 [Department for International Development, SEA0015](#)

92 [Ibid](#)

93 International Development Committee, Eighth Report of Session 2017–19, [Sexual exploitation and abuse in the aid sector](#), HC 840

poor behaviour” and poor accountability among staff in Haiti in 2011, and that individuals took advantage of this.<sup>94</sup>

77. In its written evidence Oxfam said over recent years it has worked hard to raise awareness amongst staff, and change the culture in which it works, to prevent the abuse of power and support those who speak out. Oxfam has established a new cross-country working group focusing on: LGBTQI, Disability, Gender, and Race and implemented initiatives to challenge staff to address unconscious bias. It has introduced ‘Active Bystander’ training to challenge negative behaviours such as bullying, and encourages ‘safe spaces’ and staff-led networks where people can share experiences and learn from each other about issues such as racism, sexual identity and hierarchy.<sup>95</sup> The charity is sharing its experience with others in the sector to promote learning.

78. We are aware of various initiatives undertaken by other aid organisations too. For example, to improve the flow of communication and feed into management discussions, the International Rescue Committee (IRC) has appointed two safeguarding leads to each local office who undertake these responsibilities alongside their main role. In specific locations the Department for International Development (DFID) provided financial support for dedicated in-country safeguarding-focused positions. According to the IRC initial results show growth in its clients’ trust in the organisation. It says it has increased its engagement with clients in Tanzania, including the production of client-led communication materials, alongside locally recruited staff.<sup>96</sup>

79. The initial report undertaken by our predecessor committee into sexual exploitation and abuse in the aid sector concluded that:

there is room for sector-wide clarity and agreement on how a positive safeguarding culture can be identified, and what the best tools are for ensuring that this is embedded.<sup>97</sup>

80. It also welcomed the establishment of the NGO working group on leadership and culture. Bond told this inquiry that the Working Group on Leadership and Culture has developed a tool for leaders to help them to understand what a positive safeguarding culture involves and the role they play in creating and maintaining that culture. It includes indicators of a safe culture and behaviours leaders should model. The content of the tool was finalised in 2019 and the group has worked with DFID and potential digital suppliers to develop it into a digital tool that can be widely disseminated. Bond said that through its engagement with the sector on the tool it has learned there is a desire from organisations to move beyond safeguarding compliance to organisations that have safe cultures.<sup>98</sup>

81. In its follow-up report, our predecessor committee highlighted the slow progress made to tackle sexual exploitation and abuse in the private sector in particular. Chemonics told us that it has introduced various measures, including an employee-led taskforce called the Sexual Harassment, Exploitation, and Abuse Working Group, to develop policies, procedures and systems to prevent, detect, and respond to sexual exploitation, abuse and harassment cases, with an emphasis on a survivor-centred approach. It works closely with

94 [The Charity Commission for England and Wales, SEA0022](#)

95 [Oxfam GB, SEA0008](#)

96 [International Rescue Committee, SEA0009](#)

97 International Development Committee, Eighth Report of Session 2017–19, [Sexual exploitation and abuse in the aid sector](#), HC 840, para 130

98 [Bond, SEA0013](#)

Chemonics executives and other teams to ensure employee oversight. Chemonics has also developed capacity building tools for local partners and beneficiaries to prevent, detect and address incidences of sexual exploitation, abuse and harassment.<sup>99</sup>

82. In its written evidence the IRC explained that its experience resonates with a report published by the Gender and Development Network report that found that following the Haiti scandal in 2018, public shaming and reputational risk acted as “powerful motivators” but that change has been more operational than transformative.<sup>100</sup> We agree with this assertion.

**83. Although aid organisations have taken many welcome steps to raise awareness and combat sexual exploitation and abuse, the changes have focussed on strengthening weak practices and policy development rather than transforming the power dynamics and enabling culture that have been embedded in the aid sector. Until a true transformation takes place, we fear that what happened during the 2018–20 Ebola response in the DRC could continue to occur in humanitarian aid settings around the world.**

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99 [Chemonics international, SEA0010](#)

100 [International Rescue Committee, SEA0009](#), and Gender Development Network, Workshop report, [“Safeguarding and Beyond: One Year On”](#), November 2019

## 5 Standards, accountability and regulation

### Safeguarding standards

84. The Core Humanitarian Standard on Quality and Accountability (CHS) was launched in 2014 and is a voluntary, measurable standard that draws together key elements of existing humanitarian standards and commitments. It sets out nine commitments that organisations and individuals involved in humanitarian responses can use to improve the quality and effectiveness of their work.<sup>101</sup> The October 2018 Safeguarding Summit donor commitment document and the July 2019 OECD Development Assistance Committee (DAC) Recommendation recognise the CHS as an essential international standard for safeguarding against sexual exploitation abuse and harassment<sup>102</sup> and donors require partners to adhere to either the CHS or a separate standard developed by the Inter-Agency Standing Committee.<sup>103</sup>

85. The CHS covers several aspects of humanitarian work and was not designed to be used for safeguarding specifically. In its written evidence the Department for International Development (DFID) said the standard could include “a stronger focus on how organisations actively identify and manage safeguarding as a distinct risk category.”<sup>104</sup> DFID also said the standard could be “improved to clarify and improve the indicators in its nine commitments related specifically to PSEAH [preventing sexual exploitation, abuse and harassment] and that it is supporting the CHS Alliance to take this work forward.”<sup>105</sup>

86. *We recommend that the Core Humanitarian Standard on Quality and Accountability (CHS) is amended at the next opportunity to incorporate adequate measures to protect against sexual exploitation and abuse.* This is important because it is used as the basis for audits of aid standards by the Humanitarian Quality Assurance Initiative (HQAI). HQAI is funded by DFID to provide independent verification of adherence to the CHS. Many aid organisations have voluntarily subjected themselves to an HQAI audit in order to become certified. The audits cost a significant amount of money; Executive Director of HQAI, Pierre Hauselmann told us that audits vary between £12,000 and £130,000 depending on the size and complexity of the organisation.<sup>106</sup> Our predecessor committee raised concerns that Oxfam was certified in 2018 before the final report of the Independent Commission on Sexual Misconduct, Accountability and Culture Change (IC), published in July 2019 identified weaknesses. In his oral evidence, Pierre Hauselmann explained this by saying that the weaknesses identified at Oxfam relate back to 2011 whereas the HQAI audit was looking at its current practices.<sup>107</sup> However, The Independent Commission which was initiated by Oxfam, found that although

101 Core Humanitarian Standard, “[The Standard](#)”, accessed 14 December 2020

102 [Department for International Development, SEA0015 \(“Commitments made by donors to tackle sexual exploitation and abuse and sexual harassment in the international aid sector”](#), published by the Department for International Development, October 2018 and OECD, “[DAC Recommendation on Ending Sexual Exploitation, Abuse, and Harassment in Development Co-operation and Humanitarian Assistance: Key Pillars of Prevention and Response](#)”, accessed 14 December 2020)

103 [Department for International Development, SEA0015](#)

104 [Ibid](#)

105 [Department for International Development, SEA0015](#)

106 [Q84](#)

107 [Q73–78](#)

it had taken steps to combat sexual abuse and other forms of misconduct, “a complete overhaul of its confederation-wide safeguarding system” was still required.<sup>108</sup> The Charity Commission inquiry into Oxfam GB reported in June 2019 and subsequently issued Oxfam with a regulatory Direction requiring the trustees to submit an action plan to set out its steps to implement the outstanding actions and recommendations required by the Commission. The Commission’s inquiry was clear that Oxfam’s leadership had made significant progress on improving weaknesses in its safeguarding, but it also signalled that “significant further cultural and systemic change” was required.<sup>109</sup> We asked Peter Taylor, Head of the Safeguarding Unit at the FCDO whether the Department is able to use HQAI certification as an assurance that an organisation has adequate safeguarding policies and procedures in place. He told us:

We would not just say, “They are certified; that is good enough”. We would look at the certification and the work that HQAI has done, and use that to take our own decisions about whether we feel comfortable that they are meeting the standards we require.<sup>110</sup>

While it is reassuring to hear that the FCDO undertakes its own due diligence, this raises questions about the robustness of the CHS and efficacy of HQAI certifications which are being used by the sector at considerable cost.

## Accountability

87. All Government departments that spend UK official development assistance (ODA) should have stringent processes in place to hold their delivery partners accountable for their safeguarding processes and procedures. In October 2018 DFID introduced enhanced due diligence assessments to ensure that any organisation it directly funds has adequate safeguarding standards in place.

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108 Independent Commission on Sexual Misconduct, Accountability and Culture Change, Final Report, “[Committing to Change, Protecting People](#)”, June 2019, page 39

109 The Charity Commission for England and Wales, “[Inquiry Report: Summary Findings and Conclusions: Oxfam](#)”, page 31

110 [Q270](#)





Source: DFID

88. The guidance encourages partners to move beyond compliance to the minimum standard and commit to adopting a more comprehensive safeguarding practice and culture.<sup>111</sup> It also holds partners responsible for ensuring that appropriate safeguarding standards are cascaded down the organisation's delivery chain. If prospective partners do not meet the required standards, the guidance states that:

DFID may decide to postpone issuing a grant while the organisation works to meet the minimum standards. DFID can provide support to these organisations to achieve this, within an agreed timeline.<sup>112</sup>

If a partner with an existing agreement does not meet the new enhanced standards, DFID said it will:

decide whether to immediately suspend funding or put in place an improvement plan, with protection measures where needed, to allow time for the organisation to meet the standards. This decision will depend on how strong existing arrangements are and whether the organisation is working with children and/or vulnerable people. The timeframe and monitoring of any improvement plan will be agreed locally. There may be cases where organisations cannot meet the standards and funding arrangements will need to be ended.<sup>113</sup>

89. Sarah Maguire who gave oral evidence to us representing the Safeguarding Leads Network which brings together 23 private sector suppliers to improve safeguarding

111 Department for International Development, Guidance, "[Enhanced Due Diligence: Safeguarding for external partners](#)", Updated January 2020

112 Department for International Development, Guidance, "[Enhanced Due Diligence: Safeguarding for external partners](#)", Updated January 2020

113 [Ibid](#)

standards, said that the network is keen to see an increase in the standard required of organisations before receiving any UK public funding.<sup>114</sup> She explained that it should be more than a tick-box compliance exercise and requested that the FCDO say to private sector partners:

“You have to sign up to the commitments made at the summit. You have to be demonstrating to us that you are working with your sister organisations in order to be even eligible to bid for a contract with us”.<sup>115</sup>

**90. The measures promoted by the Safeguarding Leads Network appear to be consistent with DFID’s enhanced due diligence assessments for implementing partners and should be applied consistently, including to private sector partners, in order to strengthen safeguarding standards across all aspects of aid delivery. *The FCDO should enforce the enhanced due diligence procedures developed by DFID and ensure compliance is more than a tick-box exercise at its delivery partners.***

## Keeping Children Safe enhanced due diligence central assurance assessments

91. At the Safeguarding Summit in March 2018, the then Secretary of State for International Development, Rt Hon Penny Mordaunt MP announced enhanced safeguarding standards for UK Civil Society Organisations (CSOs) to be added to DFID’s due diligence process.<sup>116</sup> In mid-2018 DFID commissioned Keeping Children Safe (KCS) to undertake safeguarding-specific central assurance assessments (CAAs) on 31 CSOs who between them account for over £2 billion of UK Aid funding, including Oxfam, Sightsavers and World Vision UK in the first batch, which was completed in early 2019. A second batch of assessments were carried out on smaller partners including Action Against Hunger and the Norwegian Refugee Council and completed in March 2020.<sup>117</sup> DFID told us it had allocated £120,000 to these assessments against the enhanced due diligence requirements set out in the previous section of this report; the summary findings were published in August 2020.<sup>118</sup> As well as receiving recommendations for improvement, the second batch of organisations received an implementation tracker, developed by KCS “to highlight priority actions and monitor progress.”<sup>119</sup>

92. The assessments indicated that organisational culture, driven by leaders, is the most important factor in changing perceptions of risk and gaining buy-in for strengthening safeguarding measures. The assessments identified gaps in tailoring safeguarding measures to different at-risk groups and specifically to children’s needs. Strikingly, KCS found that all organisations in the second batch could do more to adapt their safeguarding measures to children, it also found that many of the organisations had been slow to implement changes to strengthen their safeguarding measures, and had not taken advantage of the additional time they had compared to the first batch.<sup>120</sup>

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114 [Q22](#)

115 [Q30](#)

116 [“Summary of Findings from KCS Central Assurance Assessments of DFID Partners”](#), published by the Department for International Development, July 2020

117 [Ibid](#)

118 [“Summary of Findings from KCS Central Assurance Assessments of DFID Partners”](#), published by the Department for International Development, July 2020

119 [Ibid](#)

120 [Ibid](#)



93. Keeping Children Safe found that the decision to only include head office locations in the assessments, not country or field offices, was a significant limitation.<sup>121</sup> It is in programme delivery locations that safeguarding concerns regarding aid beneficiaries arise, so it is impossible to assess the effective implementation of safeguarding policies and processes without visiting them. Despite this, in his oral evidence, Head of the FCDO Safeguarding Unit told us he is comfortable with the results of the assessments:

We did the central assurance assessments and all the organisations met the standards that were required. We are comfortable that they are in a decent place. There is a lot of room for improvement.<sup>122</sup>

94. **We welcome the enhanced due diligence central assurance assessments that DFID funded Keeping Children Safe to undertake. This is an important step towards developing an understanding of how well partner organisations that receive UK ODA funding are meeting the enhanced safeguarding due diligence requirements. However, only assessing the central offices is a severe limitation. *The FCDO should undertake further monitoring of its implementation partners' adherence to the enhanced safeguarding due diligence requirements in the countries where programmes are implemented to assess how they work with aid beneficiaries. The results of these assessments should be used to inform the FCDO's ongoing relationship with these organisations. If their implementation of recommendations is found to be too slow then the FCDO should consider the measures it has at its disposal—such as banning that organisation from applying for future contracts—to hold the organisation accountable for its actions.***

## Regulation and oversight

95. The Charity Commission is the regulator of charities in England and Wales. In its 2018 report on Sexual exploitation and abuse in the aid sector, our predecessor committee concluded that the Charity Commission plays a crucial role in monitoring and upholding standards on safeguarding. It recommended that the Government ensures that it is provided with sufficient resources to enable it to meet the demand created by the increase in safeguarding related incident reports since efforts made to raise the profile of safeguarding concerns in 2018.<sup>123</sup> In her oral evidence to this inquiry, CEO of the Charity Commission, Helen Stephenson told us that the number of serious incident reports and whistleblowing incidents has doubled in the last couple of years, while the Commission's budget is less than it was in 2010.<sup>124</sup> She added that in 2012, the Commission closed five inquiries and it projects it will close 181 inquiries in 2020.<sup>125</sup> Furthermore, The Commission's regulatory role with regards to safeguarding is focused on ensuring that trustees comply with their legal duties and responsibilities in managing their charity. It has limited remit and reach to investigate the working practices of English and Welsh charities operating overseas. Therefore, there remains a gap in the regulation of British international aid organisations.

96. Our predecessor committee identified a lack of independent oversight in the aid sector and provided suggestions for how this could be overcome. In its follow-up report

121 [Ibid](#)

122 [Q259](#)

123 International Development Committee, Eighth Report of Session 2017–19, [Sexual exploitation and abuse in the aid sector](#), HC 840, para 182

124 [Q191](#)

125 [Ibid](#)

on sexual exploitation and abuse in the aid sector, the committee recommended an ombudsman would provide a right of appeal and an avenue through which those who have suffered can seek justice.<sup>126</sup> However, in its response to the report, the Government said it had not found any support for an ombudsman:

DFID has discussed the ombuds proposal extensively with other donors in the past year and there does not seem to be any support for an international aid ombuds or a clear vision of how a supranational body would work in practice. The emerging consensus is to focus on improving accountability and support at local and national levels. The inter-agency community-based complaints mechanism (CBCM) model is relatively new in operation, and it is important that we collectively review the implementation and impact. The InterAgency Standing Committee (IASC) Task Force are taking forward work on this and we will engage in the process.<sup>127</sup>

Inter-Agency CBCMs are rooted in the community to ensure they are culturally and gender sensitive. They can receive complaints against perpetrators from multiple organisations and referrals should be followed-up by the appropriate unit within the organisation implicated. Work on the CBCM model has been ongoing for several years now. In 2016 the IASC published comprehensive best-practice guidelines on how CBCMs can be used to protect against sexual exploitation and abuse, based on the results of a two-year project to pilot CBCMs in humanitarian settings.<sup>128</sup> However, the CBCM does not appear to provide an independent channel for victims and survivors to challenge the outcomes of investigations in the way that an ombudsman would.

97. Dr Miranda Brown told us that National Human Rights Institutions (NHRIs) could play an important role in providing oversight on sexual exploitation and abuse in the aid sector.<sup>129</sup> 80 countries already have an NHRI accredited with “A-status” by the Global Alliance of National Human Rights Institutions, including in the DRC, Haiti and Uganda.<sup>130</sup> They perform protection functions such as the preventing the torture of individuals and protecting human rights defenders. NHRIs also work to advance the rule of law and several are mandated to report publicly.<sup>131</sup> **The FCDO already undertakes work to strengthen NHRIs around the world and it could use the relationships it has built to explore how they can be utilised to provide impartial oversight, and an appeals function for victims of sexual exploitation and abuse in the aid sector.**

98. **The Committee recognises that there remain gaps in impartial oversight led by donor organisations. In its response to this report the Government should set out how the CBCM model will provide an independent avenue to survivors to seek justice when the regular reporting mechanisms fail. It should also outline any other avenues it is exploring to ensure that proper oversight is introduced.**

126 International Development Committee, First Report of Session 2019, “[Follow-up: sexual exploitation and abuse in the aid sector](#)”, HC 111, para 36

127 International Development Committee, First Special Report of Session 2019–20, [Follow up: sexual exploitation and abuse in the aid sector: Government Response to the First Report of the Committee](#), HC127, page 6

128 IASC Task Team on Accountability to Affected Populations and Protection from Sexual Exploitation and Abuse, Guideline, [Inter-Agency, Community-Based, Complaints-Mechanisms](#), April 2016

129 [Q17](#)

130 Global Alliance of National Human Rights Institutions, “[Chart of the Status of National Institutions](#)”, 27 November 2019

131 Office of the United Nations High Commissioner for Human Rights, “[OHCHR and NHRIs](#)”, Accessed 14 December 2020

## Regulated activity

99. In the UK, regulated activity refers to roles that involve working with children or vulnerable adults, such as teaching and providing care. Organisations that recruit people for regulated activities are required by law to undertake Enhanced Disclosure and Barring Service (DBS) checks to confirm whether or not an individual is barred and to prevent barred individuals from accessing these roles. Individuals seeking to undertake regulated activities are eligible for Enhanced DBS checks which will reveal whether or not a person has committed criminal activity that makes them unsafe to work with children or vulnerable adults.<sup>132</sup> Regulated activity in relation to adults is defined in the Safeguarding Vulnerable Groups Act 2006 (SVGA) as amended by the Protection of Freedoms Act 2012 (PoFA) but provisions do not currently extend to aid work.<sup>133</sup> Witnesses told us that it can be challenging for an aid worker in a UK-based organisation to obtain a DBS check under the current regulations.<sup>134</sup>

The UK Government is supporting alternative, employment cycle schemes such as the Misconduct Disclosure Scheme, the Aidworker Registration Scheme and Project Soteria to facilitate the sharing of information about aid workers and prevent known perpetrators from being re-employed in the sector.

**100. Using existing resources and mechanisms to undertake Enhanced DBS checks on aid workers who are UK nationals appears to be a sensible first step to preventing known perpetrators from being employed to these roles. *The Government should amend the regulations to designate aid work as a regulated activity, requiring aid workers to undertake an Enhanced DBS check before they can work with aid beneficiaries.***

132 High Speed Training, "[Safeguarding Children and Vulnerable Adults: What is Regulated Activity?](#)" accessed 14 December 2020

133 Department of Health, "[Regulated activity \(adults\)](#)", 2012

134 Steve Reeves, [Q31](#) Stephanie Draper, [Q210](#)

## 6 The United Nations (UN)

### Key challenges

101. Our predecessor committee described in detail the weaknesses in the UN system which have enabled the sexual exploitation and abuse of aid beneficiaries by employees of UN agencies to persist, in its 2018 report into Sexual exploitation and abuse in the aid sector.<sup>135</sup> UN agencies suffer from the same weaknesses as other aid actors outlined in the this report, including a lack positive safeguarding culture, inadequate reporting mechanisms and ineffective investigations procedures. The UK is a major donor to UN agencies and should ensure they uphold the same rigorous safeguarding standards that the FCDO outwardly demands from its non-governmental organisation (NGO) partners.

102. Witnesses to this inquiry told us that typically, when UN agencies receive reports of sexual exploitation and abuse involving UN staff, investigations into the perpetrators are undertaken internally to the UN system and lack transparency. Founder and Senior Partner of Schwab, Flaherty & Associés, Edward Flaherty raised questions about the independence and competence of the investigators themselves and explained that most UN agencies enjoy immunity from local and national laws.<sup>136</sup> He told us their legal liability on a national basis is zero.<sup>137</sup> Representatives of the UN and UN agencies have stressed repeatedly that UN immunity does not apply in cases of sexual exploitation and abuse, however, Edward Flaherty described that in spite of these claims, immunity is lifted on a case-by-case basis, and it doesn't happen very often, if at all.<sup>138</sup>

103. We took oral evidence from representatives from UNICEF, The United Nations Children's Fund and UNHCR, The United Nations Refugee Agency who explained the measures that their organisations have taken to improve investigations into sexual exploitation and abuse including hiring investigators and providing them with specialist training.<sup>139</sup> They stressed that when complaints are substantiated the perpetrator's contract will be terminated.<sup>140</sup> The UNHCR received 34 allegations of sexual exploitation and abuse involving its personnel in 2018 and 83 allegations of sexual exploitation and abuse involving its implementing partners. In 2019 it received 26 allegations involving its own personnel and 95 against its implementing partners. Between 1 January and 30 June 2020, it had received 12 allegations involving its own personnel.<sup>141</sup> We were disappointed to hear that in 2018 the UNHCR only substantiated and dismissed one staff member on the grounds of sexual exploitation and abuse despite the number of allegations reported.<sup>142</sup> In 2019, one case was substantiated but the disciplinary process was not completed before their contract expired. The UNHCR said this case was registered in the UN clear check database to avoid this person being rehired in any UN entity.<sup>143</sup> The UNHCR cites

135 International Development Committee, Eighth Report of Session 2017–19, [Sexual exploitation and abuse in the aid sector](#), HC 840

136 [Q111](#)

137 [Q112](#)

138 [Q112](#)

139 [Q162](#)

140 [Q169](#)

141 United Nations High Commissioner for Refugees, [“Our fight against sexual exploitation, abuse and harassment”](#) accessed 14 December 2020

142 [Q169](#)

143 United Nations High Commissioner for Refugees, [“Our fight against sexual exploitation, abuse and harassment”](#) accessed 14 December 2020

three further members of its workforce who resigned from the organisation before the investigation into allegations was completed.<sup>144</sup>

**104. The UN should not invoke immunity to protect perpetrators of sexual exploitation and abuse from robust investigation. *The UK should work with the UN to ensure that UN immunity is not being used to protect perpetrators and call-out UN entities that have misused immunity provisions.***

## 2018–20 Ebola response in the Democratic Republic of the Congo (DRC)

105. As described in Chapter two, in September 2020 The New Humanitarian and the Thomson Reuters Foundation reported that 51 women had accused men working on the Ebola response in the city of Beni of sexual exploitation and abuse; most allegations involving “sex for jobs” practices.<sup>145</sup>

106. Victims and survivors told the journalists that they did not know how to report the exploitation and abuse they experienced despite organisations having reporting mechanisms in place including hotlines, mailboxes and email addresses. West Africa Correspondent, Thomson Reuters Foundation Nellie Peyton told us that UNICEF had 22 mechanisms in place to receive complaints but none of the women were aware.<sup>146</sup> This demonstrates a failing on the part of the UN agencies to ensure that local women are aware of reporting mechanisms and provide them with safe and trusted means through which to report. The UK has funded a UN Victims’ Rights Advocate to improve support for victims of sexual exploitation and abuse at the hands of UN workers. There are also four Field Victims’ Rights Advocates based in the Central African Republic, Democratic Republic of the Congo, Haiti and South Sudan,<sup>147</sup> however Hannan Sulieman, Deputy Executive Director of Management at UNICEF told us that the Field Victims’ Rights Advocate in the DRC didn’t receive any reports of abuses taking place during the Ebola response in Beni<sup>148</sup> despite allegations of abuse being reported in the international press as early as February 2019.<sup>149</sup> Hannan Sulieman explained the steps that UNICEF is taking now to investigate what went wrong in the DRC:

We have a team on the ground now that is looking into this. They have gone onsite to see what we need to do. We believe that the changes have to be made on the complaints reporting mechanism. We are trying to see to what extent the victim assistance protocol has been internalised and is being introduced in the Democratic Republic of Congo. These are the key areas where we feel we need to do some immediate work as we also try to find the facts and investigate more specifically into these particular incidences that did occur.<sup>150</sup>

**107. The UK is currently the biggest donor to the World Health Organization and the FCDO should seek assurances that lessons will be learned from this case.**

144 [Ibid](#)

145 The New Humanitarian, “[EXCLUSIVE: More than 50 women accuse aid workers of sex abuse in Congo Ebola crisis](#)”, accessed 14 December 2020

146 [Q145](#)

147 United Nations, “[Field Victims’ Rights Advocates](#)”, accessed 14 December 2020

148 [Q171](#)

149 The Guardian, “[Ebola vaccine offered in exchange for sex, Congo taskforce meeting told](#)”, Accessed 14 December 2020

150 [Q172](#)

**Failings identified should inform how the organisation will better interact with local populations and involve them in public health responses in future. *The FCDO should set out how it holds the multilateral organisations that it funds to account when their safeguarding procedures are proven to be inadequate to prevent sexual exploitation and abuse by their employees.***

## Treatment of whistle-blowers

108. Over the years several cases of UN retaliation against whistle-blowers have been reported in the press. In their written evidence to this inquiry, independent investigations and human rights practitioner, Caroline Hunt-Matthes and senior fellow, Dr Alexis Bushell said that the UN should be held to account for its retaliation on whistle-blowers and that there has been a lack of examination of whistleblowing within the UN. They highlight the plight of whistle-blowers who “have lost their careers, income, savings, health and substantial time taken out of their lives, affecting their families and relationships”<sup>151</sup> and call on member states to take responsibility for corrective action. Edward Flaherty agreed that the situation for UN whistle-blowers is not improving but he suggested there are some solutions that the UK could try:

Particularly with whistle-blowers, what happens particularly in the UN is they simply come up with new policies, but nothing ever changes and there is no real protection. The problem is that the victims or the whistle-blowers have to go back to the organisation for protection that is, in fact, retaliating against them. It is a vicious cycle and it will not change.

[...] The US government now has implemented a funding mechanism that means that, if international organisations that receive funding from the US government do not meet best practice with regard to whistle-blower protection, the US can withhold up to 15% of the US appropriation to that organisation, and that is something that the UK government might consider as well.<sup>152</sup>

The Head of the FCDO Safeguarding Unit, Peter Taylor told us that the Department can withhold funding from organisations if weaknesses are identified:

if we did a central assurance assessment on the World Health Organization, which we do from time to time, and weaknesses were identified there, we might, as the Minister has said, link some percentage of our overall funding to it to making progress in that area. If it did not, some funding would potentially be withheld.<sup>153</sup>

Whistleblowing is one of the areas of practice evaluated under the Central Assurance Assessments so this response from Peter Taylor indicates that the FCDO already has the capacity to withhold funding from organisations if their whistleblowing practices are inadequate.

**109. Our evidence suggests that UN whistle-blowers continue to run the risk of retaliation if they speak out about sexual exploitation and abuse. The FCDO should**

151 [C. Hunt-Matthes and A. Bushnell, SEA0029](#)

152 [Q110](#)

153 [Q258](#)



consider what measures it has at its disposal to tackle this problem, including the funding mechanisms which can be applied, such as those used by the United States Congress to hold US aid delivery partners to account for their conduct. *The UK should advocate to the UN on its responsibility to protect whistle-blowers and the important role they play in bringing abuses to light.*

## Action taken to prevent sexual exploitation and abuse and support victims

110. Despite the weaknesses identified throughout this inquiry, the UN has taken steps to prevent sexual exploitation and abuse by UN workers and support victims better. In March 2017, the Secretary-General outlined a strategy to prevent and respond to sexual exploitation and abuse across the UN system through four streams: (a) prioritise the rights and dignity of victims; (b) end impunity through strengthened reporting and investigations, including clarifying limitations on the United Nations to achieve criminal accountability; (c) engage with civil society and external partners; and (d) improve strategic communication for education and transparency.<sup>154</sup>

111. In 2016 the UN appointed a Special Coordinator on Preventing Sexual Exploitation and Abuse to support the UN leadership as well as departments, funds and programmes to strengthen their responses to sexual exploitation and abuse.<sup>155</sup> This role is part-time and is currently performed alongside the Special Coordinator's other roles. Questions have been raised about how much time the incumbent is able to dedicate to this important work. Independent consultant, Dr Miranda Brown recommended this role should be a full-time position:

The Special Coordinator is also a very important function. It is the highest level, most visible function across the UN system. I am currently quite concerned about the situation with the Special Coordinator, primarily because the current incumbent Jane Holl Lute also performs other functions. There must be a dedicated person placed in that position. They must be full time and motivated to address this issue and not undertake other work.<sup>156</sup>

112. Dr Brown explained the Victims Rights' Advocate has had more impact, including the development of a statement on victims' rights which is being used across the sector to inform the types of support services that should be provided to victims.<sup>157</sup> The Office of the Victims' Rights advocate has also undertaken an important pilot project to map assistance and services available to victims of sexual exploitation and abuse in field settings across 13 key countries where UN agencies operate. The project provides an overview of "gaps, overlaps, lessons-learned and best practices on the legal, medical, psycho-social, safety, shelter and livelihood support being provided to victims."<sup>158</sup> The analysis is intended to inform a victim-centred approach and improve the UN's support to victims of sexual exploitation and abuse.<sup>159</sup> Since the research was undertaken the international response to contain the covid-19 pandemic has significantly impaired the support services provided

154 United Nations, "[Fact sheet on the Secretary General's Initiatives to prevent and respond to sexual exploitation and abuse](#)", accessed on 14 December 2020

155 United Nations, "[UN Special Coordinator](#)", accessed 14 December 2020

156 [Q227](#)

157 [Ibid](#)

158 United Nations, Projects, "[Mapping of Victims' Assistance](#)" accessed 14 December 2020

159 [Ibid](#)

in several countries. The mapping undertaken could be used to assess the impact that the pandemic containment measures have had on the provision of these services and ensure they are resumed when it is deemed safe to do so.

113. Other measures taken at a system-wide level include the launching of the “clear check” system in June 2018. The UNHCR said it is a user of and a contributor to the clear check databases, which enables UN entities to share information on UN personnel who have incidents relating to sexual exploitation and abuse in their history.<sup>160</sup> The UNHCR explained that any individual who has a record of sexual exploitation and abuse, or has resigned with a pending allegation, will not be considered for future positions with any UN entity.<sup>161</sup>

114. In 2016 the UN set up a Trust Fund to support UN and non-UN entities and organisations that provide victim assistance and support services to victims and children born as a result of sexual exploitation and abuse including: medical care, legal services, and psycho-social support; community outreach; and support and communications for complainants.<sup>162</sup> The UK does not fund the Trust Fund directly. Some might argue that these costs should be recovered from the perpetrators and not the UK taxpayer. However, at present the perpetrators are rarely caught and brought to justice, so it is very difficult to recover costs from them. When we asked the Minister about why the UK does not contribute to the trust fund, he told us:

We are encouraging others to fund the trust fund so that it is properly funded. We cannot address all the potential ways forward on this one.<sup>163</sup>

115. We are aware that at agency level UN entities have taken steps to improve their responses to sexual exploitation and abuse. Witnesses from the UNHCR and UNICEF told us their organisations have improved preventing sexual exploitation and abuse training and awareness raising for staff. They are hiring more staff focused on this issue, and Diane Goodman told us the UNHCR now has 400 preventing sexual exploitation and abuse focal points in the field.<sup>164</sup> In addition, it has established the capacity to run sexual misconduct checks on all personnel recruited by the organisation.<sup>165</sup> However, more could be done. Written evidence submitted jointly by Griffin Law, Hear their Cries and Kings College London set out that new technology enables perpetrators who father children through sexual exploitation and abuse to be traced.<sup>166</sup> While adhering to the necessary ethical processes, the child’s DNA can be compared with data that has been collected by commercial providers that offer services to individuals to trace their ancestors. Where parentage has been established through the courts, fathers can be prosecuted and required to contribute to their child’s upbringing.<sup>167</sup> Professor Andrew MacLeod explained to us that this process is already proving to be effective for women who work in the sex industry in the Philippines:

We have done a sample in the Philippines with six women who have worked in the sex industry in relation to sex-tourist fathers. We have taken DNA

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160 [United Nations High Commissioner for Refugees, SEA0017](#)

161 [United Nations High Commissioner for Refugees, SEA0017](#)

162 United Nations, “[Trust Fund in Support of Victims of Sexual Exploitation and Abuse](#)” accessed 14 December 2020

163 [Q285](#)

164 [Q166](#)

165 [Ibid](#)

166 [Kings College London, Griffin Law, and Hear Their Cries, SEA0011](#)

167 [Ibid](#)



from six children and we have tracked five fathers out of the six—one in the UK, one in Canada, one in California and two in Australia.

[...] This is a small subset of victims, so females between the age of puberty and menopause who got pregnant and kept the child. We now have the technology to find the individual father and hold the individual father to account for civil orders for child support, for passports for the children where law of the perpetrator allows that to happen and, in the case where the mother is under the age of 16 at time of procreation, we can now get a criminal conviction against the child sex tourism legislation, which in the UK is section 72 of the Sexual Offences Act.<sup>168</sup>

116. Since 2017 the UN has introduced several measures to tackle sexual exploitation and abuse, investigate perpetrators and better support victims. We welcome initiatives such as the mapping of services undertaken by the Victims' Rights Advocate and supported by UK funding, but we have not seen much evidence of the impact these initiatives have had to improve the experience of aid beneficiaries on the ground. The UN Special Coordinator and Victims' Rights Advocate have important roles to play in ensuring tangible improvement is achieved. *To ensure sustained high-level leadership on preventing sexual exploitation and abuse, the role of the Special Coordinator should be a full-time position.*

117. The UN trust fund for victims is an important resource for ensuring that beneficiaries who experience sexual exploitation and abuse at the hands of UN personnel receive the support they need. *The UK should consider providing funding for the trust fund for victims to contribute to the vital services it supports.*

## ICAI review of Sexual exploitation and abuse by international peacekeepers

118. On 30 September 2020 The Independent Commission for Aid Impact published its review of Sexual exploitation and abuse by international peacekeepers as a companion to its review of the UK's Preventing Sexual Violence in Conflict Initiative (PSVI). The review looked at the work undertaken by the UK to tackle sexual exploitation and abuse in international peacekeeping settings, including by soldiers, police and civilian personnel. Sexual exploitation and abuse in peacekeeping is treated as a separate issue to other forms of conflict-related sexual violence by the UN and the UK government.<sup>169</sup> Due to the limited scale of these investments and the difficulty of measuring the results, ICAI did not score this review.

119. ICAI describe sexual exploitation and abuse in peacekeeping as "a serious and persistent problem, with devastating impact on survivors."<sup>170</sup> Allegations have surfaced in many international peacekeeping missions around the world. The UN has introduced measures to combat the problem, however, internal UN reports have found serious shortcomings in the conduct of investigations, and legal obstacles to prosecution contribute to a culture of impunity.<sup>171</sup>

168 [Q105](#)

169 Independent Commission for Aid Impact, "[Sexual exploitation and abuse by international peacekeepers](#)" September 2020

170 [Ibid](#), page i

171 [Ibid](#), para 1.5

120. ICAI found that the UK has been a leading voice in tackling sexual exploitation and abuse in international peacekeeping, and it has worked with the UN secretary-general to change the mandates of peacekeeping missions and promote a voluntary compact which has been signed by 103 countries.<sup>172</sup> The review covers the period 2014–19 during which the UK's efforts were managed by the Foreign and Commonwealth Office and focused on funding for UN reform initiatives and staff positions, in addition to training programmes for international peacekeepers run by the Ministry of Defence (MOD).<sup>173</sup> The UK has prioritised improving the conduct of international peacekeeping personnel by strengthening policies and disciplinary processes, both in the UN and in troop-contributing countries. However, ICAI found that support for survivors has not been a strong feature of the UK government's work on sexual exploitation and abuse in peacekeeping.<sup>174</sup>

121. The two key recommendations of the ICAI review are:

- The UK government should aim for closer integration and sharing of learning between its efforts to tackle SEA in international peacekeeping and its wider work on conflict-related sexual violence.
- The UK government should ensure that efforts to improve discipline among peacekeeping personnel are balanced with measures to promote the interests and welfare of survivors.<sup>175</sup>

We agree, and our oral evidence highlighted further considerations for the UN and FCDO to take forward in their work to combat sexual exploitation and abuse in peacekeeping. Dr Westendorf, Senior Lecturer in International Relations, La Trobe University drew attention to the lack of commitment to act on allegations, which she says exists largely at senior and middle levels within missions. She told us that personnel are either not resourcing this work properly or sending the message that tackling sexual exploitation and abuse is not so important and that time should not be spent on investigating and holding perpetrators to account.<sup>176</sup> This leads to a sense of impunity among perpetrators.

122. Troop contributing countries (TCCs) themselves can be a significant barrier to combating sexual exploitation and abuse. Motivations for countries to contribute personnel include funding, prestige and access to training and weaponry.<sup>177</sup> Despite this, there is a persistent lack of peacekeeping troops and funding, which makes it very difficult for the UN to refuse troop participation based on a TCC's record of misconduct. Dr Westendorf also explained that some troop contributing countries use sexual violence strategically in their own conflicts, and they do not intend to hold their personnel accountable to the UN's policies.<sup>178</sup>

123. Witnesses told us that independent monitoring and oversight of peacekeeping operations is crucial for combating sexual exploitation and abuse. Dr Miranda Brown said

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172 Independent Commission for Aid Impact, "[Sexual exploitation and abuse by international peacekeepers](#)" September 2020, para 4.3

173 [Ibid](#), page 1

174 [Ibid](#), para 4.17

175 Independent Commission for Aid Impact, "[Sexual exploitation and abuse by international peacekeepers](#)" September 2020, page 16

176 [Q212](#)

177 [Q226](#)

178 [Q226](#)

there should be an independent monitoring mechanism deployed alongside peacekeeping operations to perform this function.<sup>179</sup> This is something that the UK could advocate for at the UN.

124. We welcome ICAI's review of sexual exploitation and abuse in international peacekeeping. A culture of impunity among peacekeeping troops has contributed to the persistence of sexual exploitation and abuse. Perpetrators need to know that if they are caught, they will be punished. *The UK should design its programmes for preventing sexual exploitation and abuse in a way that seeks to tackle apathy among middle and senior level leadership in peacekeeping missions and builds a strong safeguarding culture.*

125. *The UK should work with the UN to strengthen monitoring and oversight of peacekeeping missions, and to ensure that peacekeeping is properly resourced so that the UN can refuse troops from countries that have a history of unaddressed misconduct.*

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179 [Q227](#)

## 7 The role of the Foreign, Commonwealth and Development Office

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126. Since 2018, the UK has been considered as a leader in tackling sexual exploitation and abuse in the international aid sector. Focus on this problem has been strongest when it was adopted as a priority by the incumbent Secretary of State for International Development at the time. In the past this resulted in actions such as the global safeguarding summits that the UK hosted in 2018 which led to the commitments signed by donors and aid organisations to strengthen their safeguarding practices, under the leadership of the Rt Hon Penny Mordaunt. Since the merging of the Department for International Development with the Foreign and Commonwealth Office in September 2020, work on this topic has fallen to the FCDO Minister with responsibility for safeguarding and we are keen to make sure it remains a priority for the Department.

### Key documents

#### ***UK Strategy: Safeguarding Against Sexual Exploitation and Abuse and Sexual Harassment within the Aid Sector***<sup>180</sup>

127. We were pleased to see that one of the first papers published by the FCDO in September 2020 was a new safeguarding strategy. This demonstrates a positive intent to protect aid beneficiaries from sexual exploitation and abuse. The strategy has been agreed to by all government departments that spend UK official development assistance (ODA), which sends a strong message that this should be taken seriously across government. Focusing on the UK's vision for safeguarding, sector-wide theory of change and donor commitments, the strategy does not include new provisions, but it is a positive indication that the FCDO is taking up the challenge laid down by DFID.

128. We were concerned by some of the wording in the Strategy relating to UK ODA staff responsibilities which does not appear to expressly prohibit sexual relationships with aid beneficiaries. The strategy states:

Sexual relationships with beneficiaries are strongly discouraged, as well as other relationships which are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of our work<sup>181</sup>

Through correspondence with FCDO Minister, Nigel Adams, dated 16 October 2020 he clarified:

FCDO's policy position is that "some specific actions are considered unacceptable and will be treated as potential gross misconduct. These include [...] Sexual relationships between staff and beneficiaries/partners, as well as relationships based on inherently unequal power dynamics."<sup>182</sup>

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180 Foreign, Commonwealth and Development Office, policy paper, "[UK strategy: safeguarding against sexual exploitation and abuse and sexual harassment within the aid sector](#)" 10 September 2020

181 Foreign, Commonwealth and Development Office, policy paper, "[UK strategy: safeguarding against sexual exploitation and abuse and sexual harassment within the aid sector](#)" 10 September 2020

182 [Correspondence from the Minister of State for Asia, relating to the Foreign, Commonwealth and Development Office staff terms and conditions](#), dated 16 October 2020

### **DFID supply partner code of conduct<sup>183</sup>**

129. The former Department for International Development published a Supply partner code of conduct to create an inclusive culture of best practice with its delivery partners.<sup>184</sup> The code of conduct included specific safeguarding provisions but has since been withdrawn pending FCDO alignment of commercial processes and procedures following the merger of the departments. ***The FCDO should ensure that any future procurement code incorporates the most stringent measures formerly used by either department to safeguard against sexual exploitation and abuse in its supply chains.***

### **DFID Strategic Vision for Gender Equality: Her Potential, Our Future<sup>185</sup>**

130. The Strategic Vision published by DFID in March 2018 pressed DFID and its partners to deliver results for women and girls, and take action to make gender equality a reality.<sup>186</sup> Empowering women and girls and challenging power imbalances is a key aspect of tackling sexual exploitation and abuse in the aid sector and therefore, it is important that the FCDO adopts the measures set out in this Strategic Vision. However, in April 2020, the National Audit Office concluded that DFID did not have adequate planning in place to assess the progress achieved through the actions set out in the Strategic Vision.<sup>187</sup> The FCDO should ensure it has clear targets for this programme of work, because tackling gender equality is central to so much of what UK aid seeks to achieve.

131. The covid-19 pandemic and measures taken to contain it have exacerbated gender inequality around the world. At the same time, there has been a reduction in the UK aid budget. ***The measures set out in the Strategic Vision should be taken into consideration when the FCDO is deciding which programmes to prioritise and projects to improve gender equality should not be side-lined due to a lack of clear performance indicators.***

### **FCDO Progress Report on Safeguarding Against Sexual Exploitation, Abuse and Sexual Harassment (SEAH) in the International Aid Sector, 2019–20<sup>188</sup>**

132. The FCDO published its progress report in October 2020. It provides a useful update on the work it is undertaking currently and describes upcoming work to improve support for victims and survivors and improve data collection on sexual exploitation and abuse cases. However, there are some significant gaps. The progress report gives no update on protections for whistle-blowers, for example. ***For transparency, future progress reports should include an update on each aspect of the commitments, even if it is a nil return.***

183 Department for International Development, "[DFID Supply Partner Code of Conduct](#)" January 2019

184 *Ibid*, page 1

185 Department for International Development, "[DFID Strategic Vision for Gender Equality; A Call to Action for Her Potential, Our Future](#)" March 2018

186 Department for International Development, "[DFID Strategic Vision for Gender Equality; A Call to Action for Her Potential, Our Future](#)" March 2018, p3

187 National Audit Office, "[Improving the lives of women and girls overseas](#)", HC 316, Session 2019–21, page 8

188 Foreign, Commonwealth and Development Office, Impact Assessment, [FCDO Progress Report on Safeguarding Against Sexual Exploitation, Abuse and Sexual Harassment \(SEAH\) in the International Aid Sector, 2019–20](#), 20 October 2020

## Annual Report and Accounts

133. *In recent years DFID has included a specific safeguarding section in its annual reports and accounts. In 2019–20 this included important data on the number of safeguarding reports that DFID received. This is good practice and should be replicated by the FCDO.* In oral evidence, we received assurances from Peter Taylor, Head of the FCDO Safeguarding Unit, that at official level the intention is to replicate the format of the DFID annual report, including data on the number of cases.<sup>189</sup>

## ICAI review of the Preventing Sexual Violence in Conflict Initiative (PSVI)

134. On 9 January 2020 the Independent Commission for Aid Impact published its review of the UK's Preventing Sexual Violence in Conflict Initiative (PSVI).<sup>190</sup> The PSVI is a cross-departmental initiative which was led by the Foreign and Commonwealth Office (FCO) prior to its merger with the Department for International Development in September 2020. In 2014, the then foreign secretary, William (now Lord) Hague, co-hosted the high-profile Global Summit to End Sexual Violence in Conflict with Angelina Jolie, Special Envoy to the United Nations High Commissioner for Refugees. The summit resulted in pledges to practical action to end conflict-related sexual violence. The PSVI subsequently launched its International Protocol on Documentation and Investigation of Sexual Violence in Conflict.<sup>191</sup> ICAI investigated how the UK government followed up on its Summit commitments on preventing sexual violence, supporting survivors and promoting justice and accountability. It scored the initiative amber/red, which indicates “unsatisfactory achievement in most areas, with some positive elements.”<sup>192</sup>

135. ICAI found that the initiative had helped to establish the UK as a leading voice on international efforts to tackle conflict-related sexual violence, however, after the departure of Lord Hague in mid-2014, leadership of PSVI moved from the level of foreign secretary to special representative. Ministerial interest in the initiative waned and the PSVI's staffing and funding levels dropped substantially.<sup>193</sup> ICAI identified several concerning weaknesses in the initiative including a lack of overarching strategy and a fragmentation of programming across countries and implementing departments.<sup>194</sup> Survivors called for long-term interventions that address the underlying causes and effects of sexual violence. However, most PSVI projects are subject to the FCO's one-year funding cycles and tend to focus on short-term fixes.<sup>195</sup> ICAI found little meaningful inclusion of survivors in programme design, and most worryingly, inadequate ethics protocols and monitoring mechanisms pose risks that projects may cause inadvertent harm.<sup>196</sup> The Initiative lacks a system for monitoring, analysing, sharing or storing results information, and learning is ad hoc rather than part of a systematic learning approach.<sup>197</sup>

189 [Q250](#)

190 Independent Commission for Aid Impact, Joint Review, “[The UK's Preventing Sexual Violence in Conflict Initiative](#)”, January 2020

191 [Ibid](#)

192 Independent Commission for Aid Impact, “[How we work](#)”, accessed 14 December 2020

193 Independent Commission for Aid Impact, Joint Review, “[The UK's Preventing Sexual Violence in Conflict Initiative](#)”, January 2020, para 4.25

194 [Ibid](#), para 4.14

195 [Ibid](#), para 4.38

196 [Ibid](#), para 4.43

197 [Ibid](#), para 4.56



136. One positive aspect identified by ICAI was that many projects run by implementing partners had been innovative and useful.<sup>198</sup> The four key recommendations identified by ICAI are:

- The UK government should ensure that the important issue of preventing sexual violence in conflict is given an institutional home which enables both full oversight and direction, while also maximising the particular strengths and contributions of each participating department.
- The UK government should ensure that its programming activities on preventing sexual violence in conflict are embedded within a structure which supports effective design, monitoring and evaluation, and enables long-term impact.
- The UK government should ensure that its work on preventing conflict-related sexual violence is founded on survivor-led design, which has clear protocols in place founded in ‘do no harm’ principles.
- The UK government should build a systematic learning process into its programming to support the generation of evidence of what works in addressing conflict-related sexual violence and ensure effective dissemination and uptake across its portfolio of activities.<sup>199</sup>

We agree with ICAI’s recommendations and the call for a survivor-led approach resonates with our work on preventing sexual exploitation and abuse in the aid sector. We asked FCDO Minister, Lord Ahmad about the reduction in funding and resourcing for the initiative since 2014 and he indicated that a surge in capacity was provided to plan and organise the conference in 2014. Since then the core programme team has consisted of five people, and this has reduced to four people in the current year.<sup>200</sup>

Since ICAI undertook the review the Foreign and Commonwealth Office has merged with the Department for International Development, which presents the Government with a good opportunity to join-up programming and improve coherence across the initiative. Dr Tamsyn Barton, Chief Commissioner of the Independent Commission for Aid Impact told us that in the new structure of the Foreign, Commonwealth and Development Office there is a Research and Evidence Division.<sup>201</sup> This Division should be mobilised to strengthen monitoring, analysis and learning in FCDO initiatives which had been identified as a weakness in PSVI. Dr Barton also told us that when ICAI undertook the review the FCO’s Gender Equality Unit, the Commission did not have line of sight of the activities taking place under the initiative.<sup>202</sup> In his oral evidence on 19 November 2020 Lord Ahmad said that Katy Ransome, Head of the Gender Equality Unit at the FCDO coordinates the PSVI and that her role is essential to ensuring that the different strands of the gender agenda are interconnected. Lord Ahmad told us that the joined-up approach has extended to high commissioners and ambassadors in-country too.<sup>203</sup>

198 [Ibid](#), para 4.28

199 Independent Commission for Aid Impact, Joint Review, “[The UK’s Preventing Sexual Violence in Conflict Initiative](#)”, January 2020, page iii

200 [Q291](#)

201 [Q236](#)

202 [Ibid](#)

203 [Q296](#)

137. **The Preventing Sexual Violence in Conflict Initiative has lost its way since Foreign Secretary Hague left the Foreign and Commonwealth Office. The permanent team of staff dedicated to the initiative is small and funding has dwindled. Similar to our findings for the aid sector, it could be improved through better engagement with local populations. *The FCDO should use the merger as an opportunity to reinvigorate the PSVI and the Gender Equality Division should develop a coherent strategy for the initiative which is coordinated with the wider priorities of the Unit. The FCDO should consider how the Research and Evidence Division can help to improve monitoring and learning so the initiative can be strengthened in future and adopt longer funding cycles to enable long-term planning.***

## Challenges for the future

138. We are keen to ensure that the FCDO continues to work proactively with its partners to combat sexual exploitation and abuse in the aid sector. It needs to ensure that it has proactive conversations with its partners about the funding and support they require, in order to deliver safe programmes. Our evidence included some encouraging examples of how these partnerships worked under DFID that the FCDO can learn from for the future. In written evidence from the International Rescue Committee submitted before the merging of the departments, it provided a positive example of how DFID's in-country team had provided support to help it to deliver programmes in Sierra Leone. The IRC explained that there was a dedicated safeguarding budget for the two main consortia programmes that it is involved with and DFID's in-country team held workshops to bring aid actors together and share learning.<sup>204</sup>

139. In her oral evidence to this Committee in July, Sarah Maguire, representing the private sector Safeguarding Leads Network told us that private sector suppliers were encouraged by DFID to include safeguarding in their budgets and they were increasingly including safeguarding in Foreign Office contracts too. She encouraged the new FCDO to adopt this approach and ensure there is adequate resourcing for safeguarding.<sup>205</sup> In her oral evidence to this inquiry Frances Longley, Co-Chair of the NGO Safeguarding Working Group on Leadership and Culture said she would expect to have budget lines in individual projects and programmes dedicated to safeguarding, but she warned that they only work if the organisation has a strong culture of safeguarding running through it. She told us that often, when government departments issue grants and contracts with a strong emphasis on value for money, there is a danger that they scale down the importance of things like safeguarding. She explained that there might be a line in a project for safeguarding training, staffing or resources on a particular project, but she advised that this must be underpinned by an entire organisation and a culture of safeguarding, and that has to be paid for out of its overheads.<sup>206</sup> However she told us that her experience of working with DFID had been very positive and she hopes this will continue under the FCDO:

I would love the new Department to continue the best of the work DFID has done. Its safeguarding unit has been fabulous. We have had some really fantastic partnership from DFID in the last couple of years, trying to work towards a common goal here. I would love to see the new Department have a very joined-up approach to that to take it forward.<sup>207</sup>

204 [International Rescue Committee, SEA0009](#)

205 [Q20](#)

206 [Q23](#)

207 [Q24](#)

140. We hope the FCDO will work positively with its implementing partners to combat sexual exploitation and abuse in ODA funded programmes. *The FCDO should ensure that safeguarding is properly budgeted for in programme contracts and is not undermined by wider value for money requirements. It should also show leadership on this issue among other UK ODA spending departments.*

## Conclusions and recommendations

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### Reporting mechanisms, investigations and whistleblowing

1. Aid organisations must be alert to the barriers that might prevent aid beneficiaries from reporting abuses. They should design sensitive reporting mechanisms with the local population, in order to give victims and survivors, and their families and friends a safe means to report their concerns and complaints. This might include face-to-face reporting if they prefer and will often involve community-based organisations and safe spaces for women to report, without necessarily going through the formal mechanisms set up by the aid providers. These community-based organisations should also be encouraged to hold open and frank conversations with aid beneficiaries about any concerns they have about the aid organisations operating in the area, to encourage them to open up about the experiences they have had. (Paragraph 20)
2. We hope work to improve investigations at UK ODA receiving partners will continue under the merged FCDO in a way that encourages participation of the local population in the process. However, the culture of the sector (described in Chapter 4 of this report) is also key to ensuring that robust investigations are undertaken and complaints against perpetrators are upheld. (Paragraph 26)
3. *The FCDO should adopt the practices developed by DFID to improve investigations, including incorporating a requirement to report cases to the FCDO into funding agreements with partners. The Safeguarding Investigations Team should continue to check that reports of sexual exploitation and abuse are satisfactorily managed; and it should take-up the work proposed by DFID to improve the skills of first responders and investigators.* (Paragraph 27)
4. The work undertaken by the UK government and the sector as a whole to improve reporting and investigations and provide additional guidance is welcome, however, the lack of capacity in the sector and absence of common standard for investigations means that the outcomes of investigations are unreliable. Therefore, there is a risk that the employment cycle schemes could be used to retaliate against people who raise legitimate concerns and they might fail to properly identify and prevent the re-employment of perpetrators. (Paragraph 29)
5. Employment cycle schemes which are designed to prevent perpetrators of sexual exploitation and abuse from being re-hired in the aid sector will only work if perpetrators are reported and robust investigations undertaken. Therefore, improving reporting and investigations should be prioritised. *The FCDO should support initiatives to increase investigations capacity in the aid sector and work with its partners to ensure that the employment cycle schemes incorporate checks and balances to ensure they are just and fair to survivors and aid workers.* (Paragraph 30)
6. *The FCDO should undertake a review of the cost and likely effectiveness of the employment cycle schemes at preventing perpetrators of sexual exploitation and abuse from being re-employed in the aid sector.* (Paragraph 31)

7. A full and transparent audit of whistleblowing in the aid sector has still not taken place. *The FCDO should undertake an audit to provide a full understanding of how whistleblowing practices are being implemented and used, to give confidence that whistle-blowers are actively supported and not retaliated against by their organisations.* (Paragraph 37)
8. An audit will also help the FCDO along with other donors to hold aid organisations accountable for their treatment of whistle-blowers. The results of an audit could help donors to develop incentives for managers to encourage effective reporting on standards of conduct. (Paragraph 38)
9. We are concerned that the use of non-disclosure agreements in the aid sector could be used to cover-up misconduct and will exacerbate power imbalances. *As part of its due diligence processes the FCDO should require organisations it funds to report to it the number of non-disclosure agreements they have signed, to help the FCDO to ensure that its partners are not misusing NDAs to silence individuals who raise legitimate concerns.* (Paragraph 41)
10. We welcome the plans that the FCDO has to improve data relating to sexual exploitation and abuse in the aid sector. We believe this is a key step to understanding the scale of the problem and will enable the international community to better evaluate efforts taken to combat sexual exploitation and abuse. *To facilitate the collection of data, the FCDO should make it clear to its partners that reporting cases of sexual exploitation and abuse will not be treated as a reason to be penalised, as long as they can demonstrate that they have robust mechanisms in place to deal with the misconduct. FCDO partners should report annually their total number of safeguarding allegations they receive and the number that are upheld.* (Paragraph 43)

### Support for victims and survivors

11. It is imperative that aid beneficiaries who become victims and survivors of sexual exploitation and abuse have access to the support and services they need, and they are informed how to safely use them. The potential need to provide these services should be factored in from the start of programmes, including at the planning stage. *The FCDO should include the cost of supporting victims and survivors in grants and contracts for running programmes that it funds. The UK should work in partnership with victims and survivors to deliver the support they need, engaging with community-based organisations in country, to provide services to victims and survivors and providing funding and training if these are requested by those organisations. The FCDO should place requirements on its implementing partners to ensure that victims and survivors have free and safe access to the support and services they need and this support is not conditional on following a formal complaints process.* (Paragraph 49)
12. Although the aid sector faces additional challenges due the international nature of many of its perpetrators, the FCDO can use the experience of International Justice Mission to help inform how it can better support countries to strengthen their local justice mechanisms and ensure that survivors have confidence in local authorities to restrain their abusers and offer meaningful protection. (Paragraph 53)

13. We welcome the Minister's announcement of new support for victims and survivors and we ask that he provides this Committee with an update on that programme of support once further details are available. We agree with the approach that the FCDO says it is taking to work with and strengthen in-country justice mechanisms. However, we believe it might be helpful for some victims and survivors to be able to contact UK systems directly. Embassy and High Commission staff already have experience of working with the local justice systems in the countries where they are based, through helping British nationals to navigate them. This experience could be used to help support victims and survivors of sexual exploitation and abuse where the perpetrator was British or employed by a British aid organisation. (Paragraph 56)
14. *The FCDO should consider how it can join-up its diplomatic and aid functions to better support victims of sexual exploitation and abuse. UK High Commissions and Embassies in countries that receive UK Aid should develop the capacity to provide support to victims and survivors of sexual exploitation and abuse where the perpetrator was British or employed by a British aid organisation. In particular, they should use their experience and contacts to help the victims and survivors to navigate the local legal system, where applicable.* (Paragraph 57)
15. *The Government should consider how the provisions included in sections 66 to 68 of The Domestic Abuse Bill 2019–21 could be applied to aid workers who commit sexual offences against adults overseas. It should also seek to use existing legislation to prosecute British aid workers who commit offences against children, as this would provide a strong deterrent.* (Paragraph 60)

### Power dynamics and culture

16. Aid organisations should try to design programmes in cooperation with the local populations where the programmes will be delivered. They should also take responsibility for ensuring that aid beneficiaries are fully informed of their rights and know what is and what is not acceptable behaviour by aid workers. They might disseminate this information themselves with cooperation from the local population, or work with local women's rights organisations to share the information. Either way, it must be shared in a sensitive and context specific manner. Access to this information will empower women and help them to make informed decisions. *The FCDO should prioritise organisations that demonstrate active engagement with local populations when it is tendering for aid delivery contracts.* (Paragraph 65)
17. It is important that the international aid sector recognises the risks that the covid-19 pandemic and measures taken to contain it pose to women. Any reduction in aid supplies will make them more vulnerable to exploitation and abuse and should be avoided. This comes at the same time that safe spaces and confidential services for women are becoming more difficult to access. *International aid organisations should work with local, community-based organisations in-country to continue to provide gender-based support and access to services throughout the covid-19 pandemic. This should be taken as an opportunity to consider how these services can be more locally led in future too.* (Paragraph 68)
18. It is important that aid organisations promote diversity and inclusion, including recruiting greater numbers of women and minority ethnic staff to senior leadership



roles, to challenge and overcome discriminatory attitudes and cultures that permit sexual exploitation and abuse to perpetuate as occurred during the 2018–20 Ebola response in the DRC. (Paragraph 72)

19. Aid organisations must acknowledge the extreme power imbalances that have been a feature of the sector and design their programmes in a way that empowers beneficiaries. *Managers should be held responsible for instilling an open and inclusive culture at their organisation that is actively anti-racist, where all staff are valued and safeguarding against sexual exploitation and abuse is ingrained in its daily operations. They should be reprimanded when it is clear this hasn't happened.* (Paragraph 73)
20. Although aid organisations have taken many welcome steps to raise awareness and combat sexual exploitation and abuse, the changes have focussed on strengthening weak practices and policy development rather than transforming the power dynamics and enabling culture that have been embedded in the aid sector. Until a true transformation takes place, we fear that what happened during the 2018–20 Ebola response in the DRC could continue to occur in humanitarian aid settings around the world. (Paragraph 83)

### Standards, accountability and regulation

21. *We recommend that the Core Humanitarian Standard on Quality and Accountability (CHS) is amended at the next opportunity to incorporate adequate measures to protect against sexual exploitation and abuse.* (Paragraph 86)
22. The measures promoted by the Safeguarding Leads Network appear to be consistent with DFID's enhanced due diligence assessments for implementing partners and should be applied consistently, including to private sector partners, in order to strengthen safeguarding standards across all aspects of aid delivery. *The FCDO should enforce the enhanced due diligence procedures developed by DFID and ensure compliance is more than a tick-box exercise at its delivery partners.* (Paragraph 90)
23. We welcome the enhanced due diligence central assurance assessments that DFID funded Keeping Children Safe to undertake. This is an important step towards developing an understanding of how well partner organisations that receive UK ODA funding are meeting the enhanced safeguarding due diligence requirements. However, only assessing the central offices is a severe limitation. *The FCDO should undertake further monitoring of its implementation partners' adherence to the enhanced safeguarding due diligence requirements in the countries where programmes are implemented to assess how they work with aid beneficiaries. The results of these assessments should be used to inform the FCDO's ongoing relationship with these organisations. If their implementation of recommendations is found to be too slow then the FCDO should consider the measures it has at its disposal—such as banning that organisation from applying for future contracts—to hold the organisation accountable for its actions.* (Paragraph 94)
24. The FCDO already undertakes work to strengthen NHRIs around the world and it could use the relationships it has built to explore how they can be utilised to provide impartial oversight, and an appeals function for victims of sexual exploitation and abuse in the aid sector. (Paragraph 97)

25. The Committee recognises that there remain gaps in impartial oversight led by donor organisations. *In its response to this report the Government should set out how the CBCM model will provide an independent avenue to survivors to seek justice when the regular reporting mechanisms fail. It should also outline any other avenues it is exploring to ensure that proper oversight is introduced.* (Paragraph 98)
26. Using existing resources and mechanisms to undertake Enhanced DBS checks on aid workers who are UK nationals appears to be a sensible first step to preventing known perpetrators from being employed to these roles. *The Government should amend the regulations to designate aid work as a regulated activity, requiring aid workers to undertake an Enhanced DBS check before they can work with aid beneficiaries.* (Paragraph 100)

### The United Nations (UN)

27. The UN should not invoke immunity to protect perpetrators of sexual exploitation and abuse from robust investigation. *The UK should work with the UN to ensure that UN immunity is not being used to protect perpetrators and call-out UN entities that have misused immunity provisions.* (Paragraph 104)
28. The UK is currently the biggest donor to the World Health Organization and the FCDO should seek assurances that lessons will be learned from this case. Failings identified should inform how the organisation will better interact with local populations and involve them in public health responses in future. *The FCDO should set out how it holds the multilateral organisations that it funds to account when their safeguarding procedures are proven to be inadequate to prevent sexual exploitation and abuse by their employees.* (Paragraph 107)
29. Our evidence suggests that UN whistle-blowers continue to run the risk of retaliation if they speak out about sexual exploitation and abuse. The FCDO should consider what measures it has at its disposal to tackle this problem, including the funding mechanisms which can be applied, such as those used by the United States Congress to hold US aid delivery partners to account for their conduct. *The UK should advocate to the UN on its responsibility to protect whistle-blowers and the important role they play in bringing abuses to light.* (Paragraph 109)
30. Since 2017 the UN has introduced several measures to tackle sexual exploitation and abuse, investigate perpetrators and better support victims. We welcome initiatives such as the mapping of services undertaken by the Victims' Rights Advocate and supported by UK funding, but we have not seen much evidence of the impact these initiatives have had to improve the experience of aid beneficiaries on the ground. The UN Special Coordinator and Victims' Rights Advocate have important roles to play in ensuring tangible improvement is achieved. *To ensure sustained high-level leadership on preventing sexual exploitation and abuse, the role of the Special Coordinator should be a full-time position.* (Paragraph 116)
31. The UN trust fund for victims is an important resource for ensuring that beneficiaries who experience sexual exploitation and abuse at the hands of UN personnel receive the support they need. *The UK should consider providing funding for the trust fund for victims to contribute to the vital services it supports.* (Paragraph 117)

32. We welcome ICAI's review of sexual exploitation and abuse in international peacekeeping. A culture of impunity among peacekeeping troops has contributed to the persistence of sexual exploitation and abuse. Perpetrators need to know that if they are caught, they will be punished. *The UK should design its programmes for preventing sexual exploitation and abuse in a way that seeks to tackle apathy among middle and senior level leadership in peacekeeping missions and builds a strong safeguarding culture.* (Paragraph 124)
33. *The UK should work with the UN to strengthen monitoring and oversight of peacekeeping missions, and to ensure that peacekeeping is properly resourced so that the UN can refuse troops from countries that have a history of unaddressed misconduct.* (Paragraph 125)

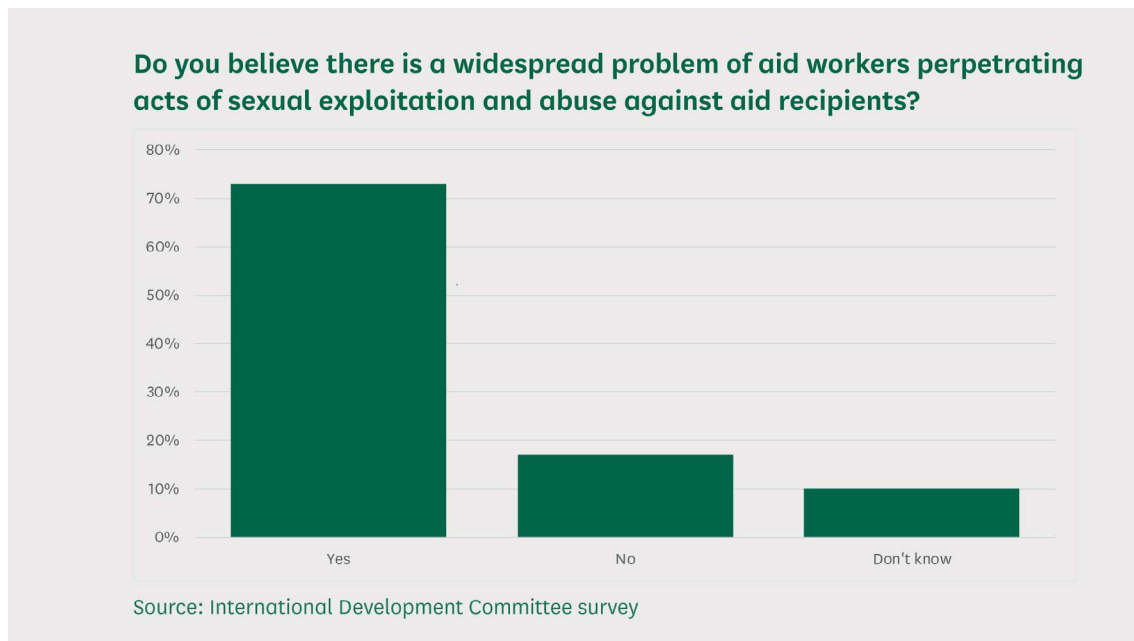
### The role of the Foreign, Commonwealth and Development Office

34. *The FCDO should ensure that any future procurement code incorporates the most stringent measures formerly used by either department to safeguard against sexual exploitation and abuse in its supply chains.* (Paragraph 129)
35. *The measures set out in the Strategic Vision should be taken into consideration when the FCDO is deciding which programmes to prioritise and projects to improve gender equality should not be side-lined due to a lack of clear performance indicators.* (Paragraph 131)
36. *For transparency, future progress reports should include an update on each aspect of the commitments, even if it is a nil return.* (Paragraph 132)
37. *In recent years DFID has included a specific safeguarding section in its annual reports and accounts. In 2019–20 this included important data on the number of safeguarding reports that DFID received. This is good practice and should be replicated by the FCDO.* (Paragraph 133)
38. The Preventing Sexual Violence in Conflict Initiative has lost its way since Foreign Secretary Hague left the Foreign and Commonwealth Office. The permanent team of staff dedicated to the initiative is small and funding has dwindled. Similar to our findings for the aid sector, it could be improved through better engagement with local populations. *The FCDO should use the merger as an opportunity to reinvigorate the PSVI and the Gender Equality Division should develop a coherent strategy for the initiative which is coordinated with the wider priorities of the Unit. The FCDO should consider how the Research and Evidence Division can help to improve monitoring and learning so the initiative can be strengthened in future and adopt longer funding cycles to enable long-term planning.* (Paragraph 137)
39. We hope the FCDO will work positively with its implementing partners to combat sexual exploitation and abuse in ODA funded programmes. *The FCDO should ensure that safeguarding is properly budgeted for in programme contracts and is not undermined by wider value for money requirements. It should also show leadership on this issue among other UK ODA spending departments.* (Paragraph 140)

## Annex – survey data

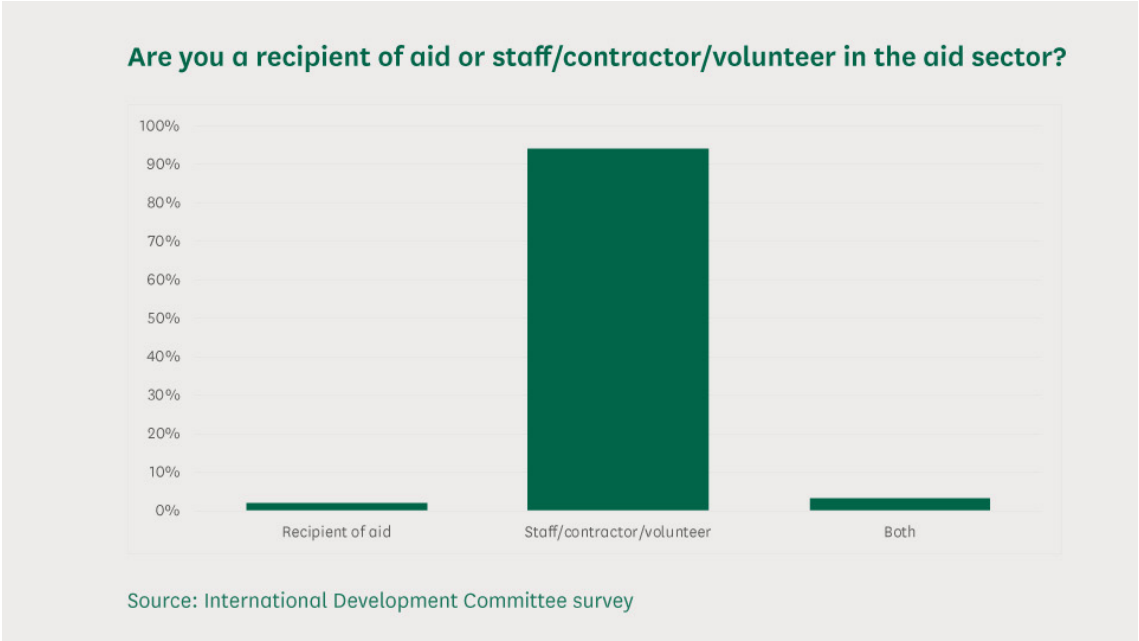
*This annex sets out key data from the survey undertaken by the International Development Committee to gauge how individuals who have experience of the aid sector rate the progress made to tackle sexual exploitation and abuse since 2018. The survey was open from 14 August to 14 September 2020 and we received 64 responses. We are very grateful to all those who took the time to respond to this survey.*

### 1.



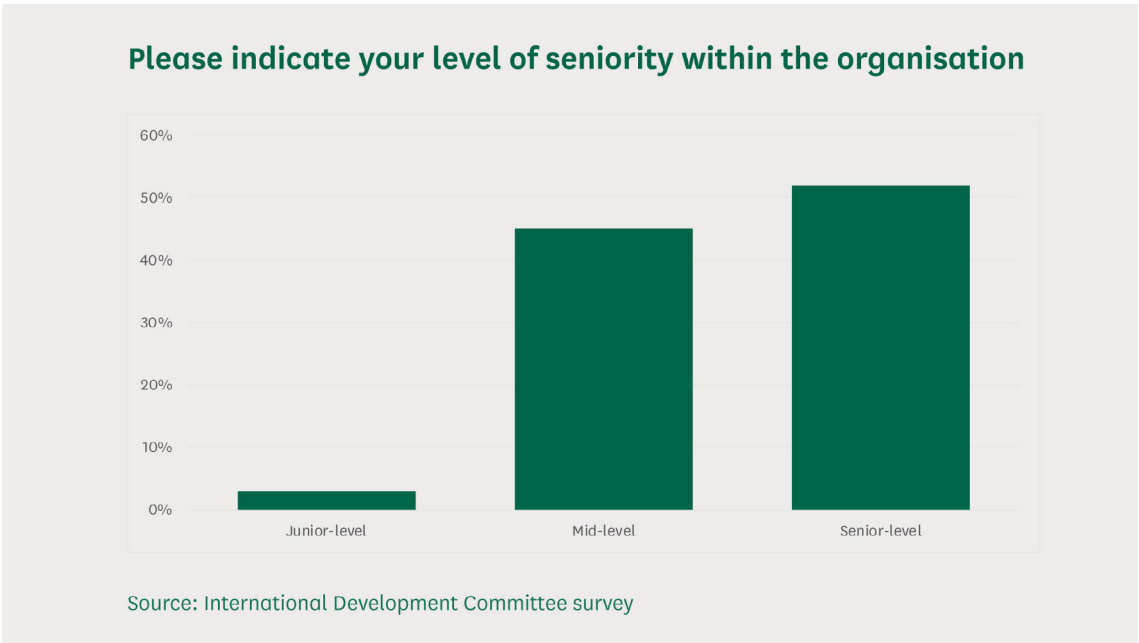
73% of individuals who responded to our survey told us they believe there is a widespread problem of aid workers perpetrating acts of sexual exploitation and abuse against aid recipients.

2.



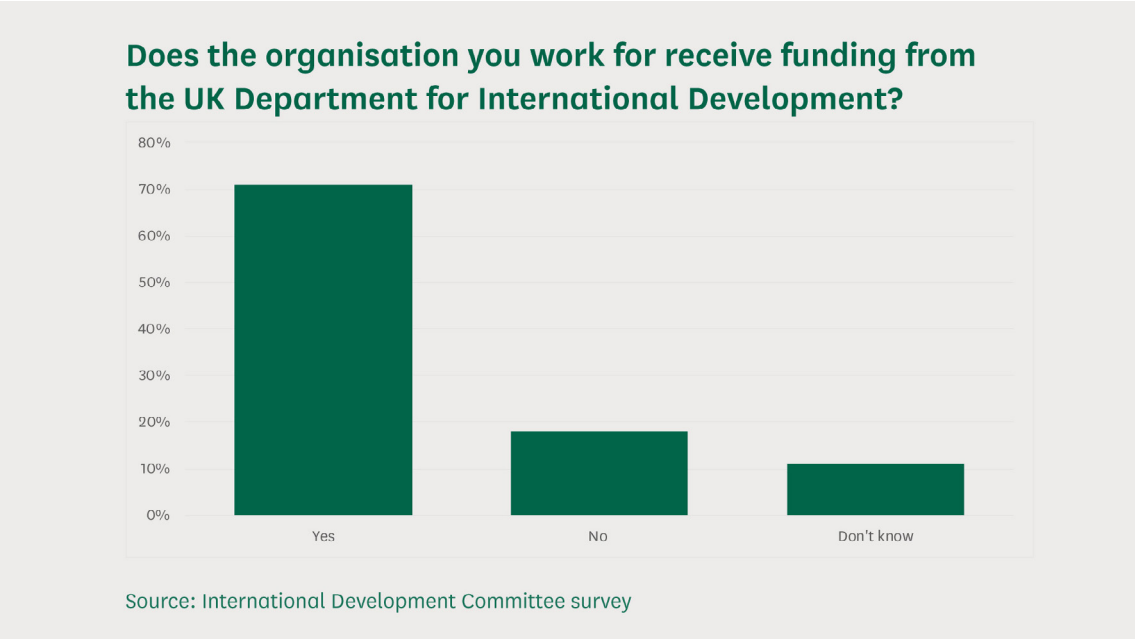
The overwhelming majority of individuals who responded to our survey are aid staff, contractors and volunteers.

3.



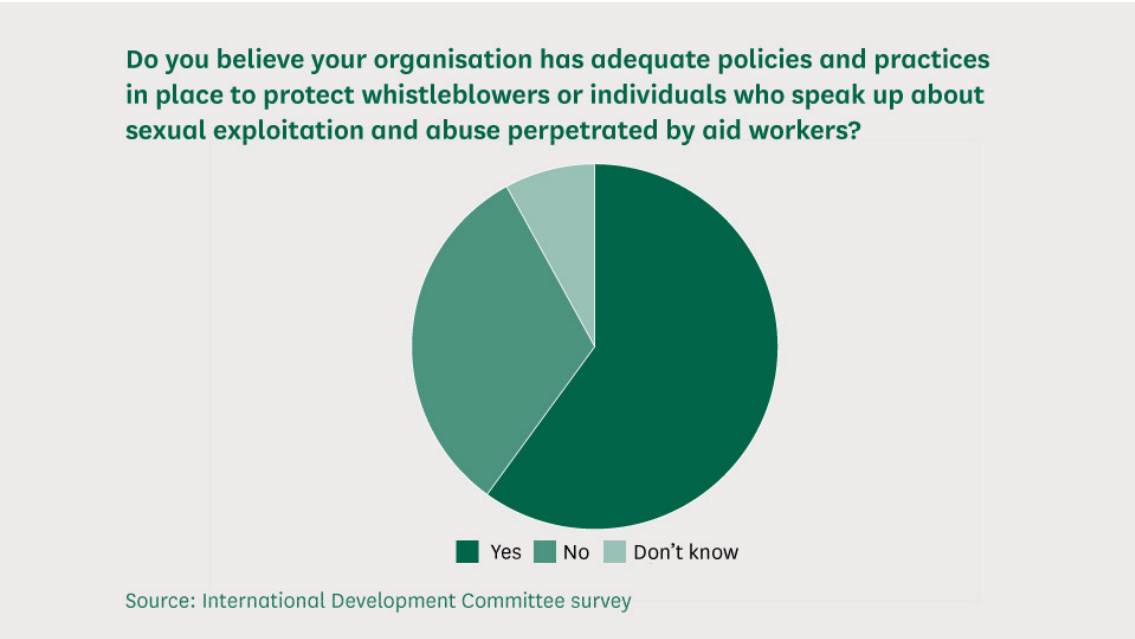
Most individuals who responded to our survey are at a mid or senior-level of seniority within their organisation.

4.



A majority of individuals who responded to our survey work for organisations that receive UK aid funding.

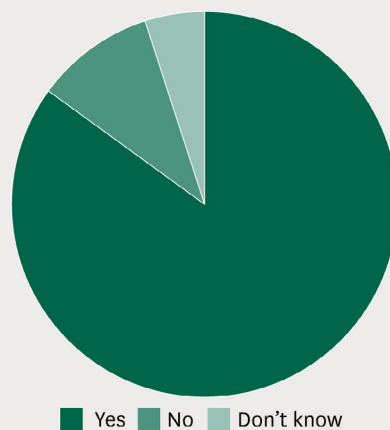
5.





6.

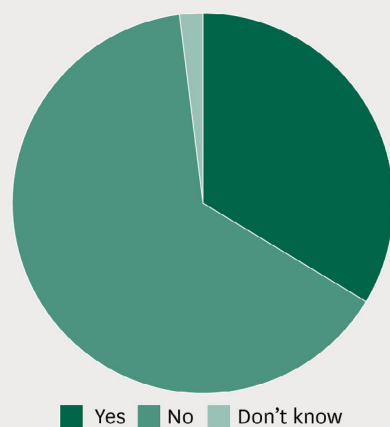
**Do you have knowledge of the policies and practices in your organisation to protect you if you spoke-up or became a whistleblower?**



Source: International Development Committee survey

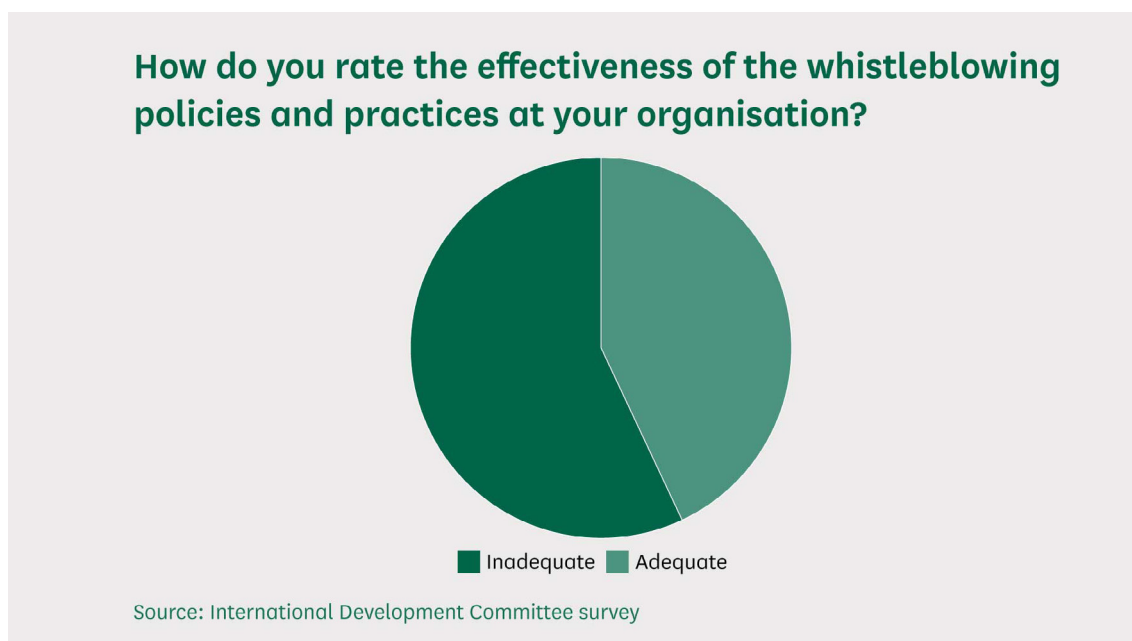
7.

**Have you ever tested the whistleblowing policies and practices in place at your organisation?**



Source: International Development Committee survey

8.

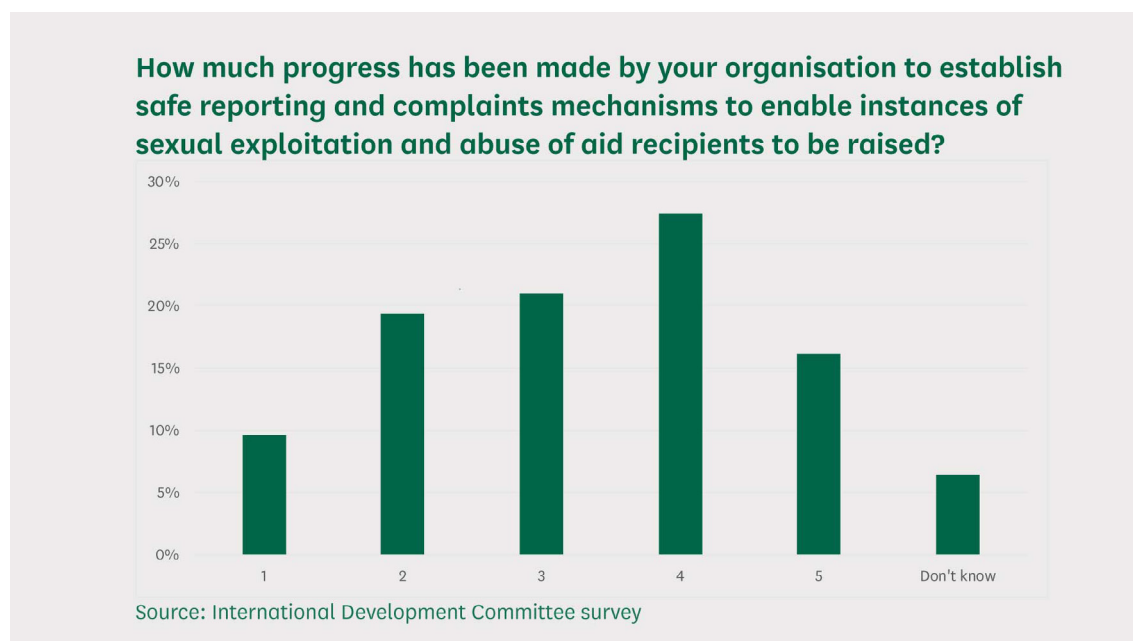


If we compare pie charts 5, 6, 7 and 8, our survey found that 60% of individuals who answered the question believe that their organisation has adequate policies and practices in place to protect whistle-blowers and individuals who speak up about sexual exploitation and abuse perpetrated by aid workers. In addition, pie chart 6 shows that 85% of responders said they have knowledge of the policies and practices in their organisation to protect them if they spoke-up or became a whistle-blower. However, pie chart 7 shows that only 34% of individuals who responded to the survey had tested the whistleblowing practices and procedures in place. Pie chart 8 demonstrates that of those who have tested the policies and practices at their organisation, 57% found they were inadequate.

In the following section, the survey required responders to rank their responses on a scale of one to five, indicating how much progress has been made since 2018. A score of one indicates that no progress has been made and a score of five indicates that the issue has been solved. The sixth bar shows how many individuals selected “I don’t know/ I don’t think this is a problem”.

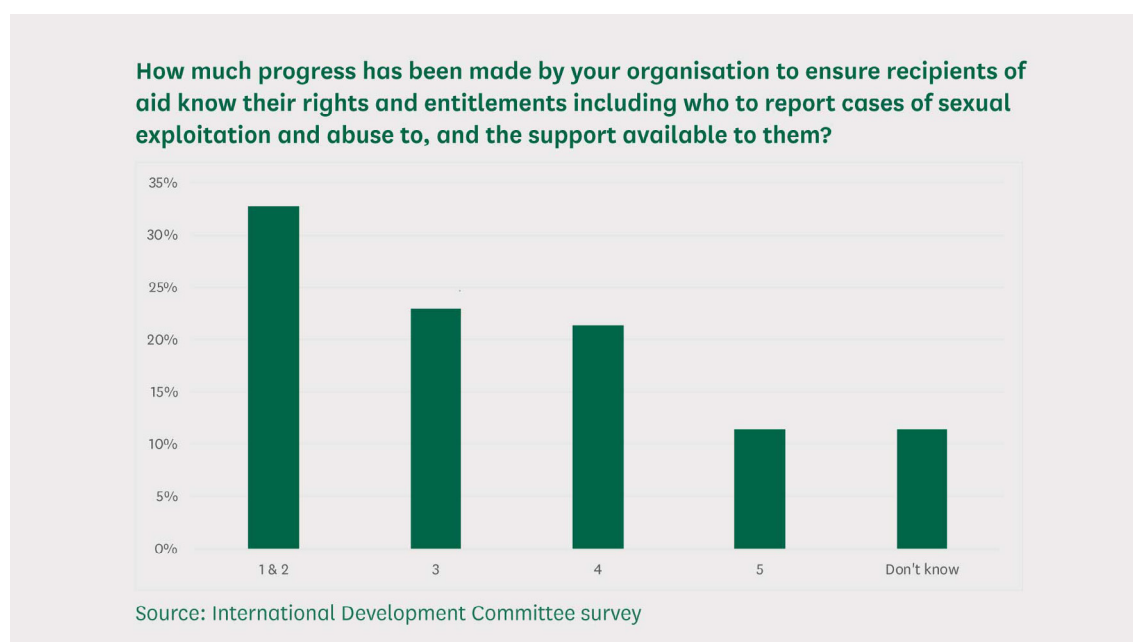
Graphs nine to eleven relate to the organisation the individual works for or has connections to.

9.



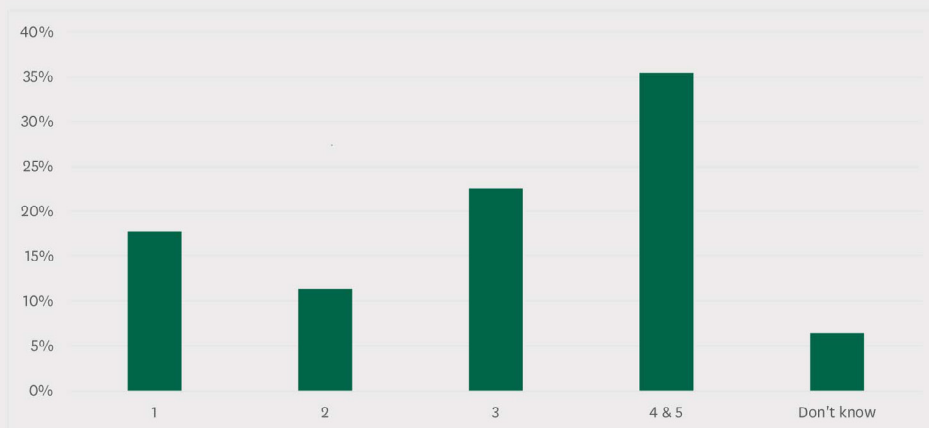
Only 16% of individuals who responded to our survey chose option five, indicating that their organisation has safe reporting and complaints mechanisms in place to enable instances of sexual exploitation and abuse of aid recipients to be raised. This suggests that the other organisations require some progress to ensure these mechanisms are in place and are safe to use.

10.



Combining the data from bars one and two shows that 33% of individuals who responded to our survey thought that their organisation had made little or no progress on ensuring that aid recipients know their rights and entitlements including who to report cases of sexual exploitation and abuse to, and the support available to them.

## 11.

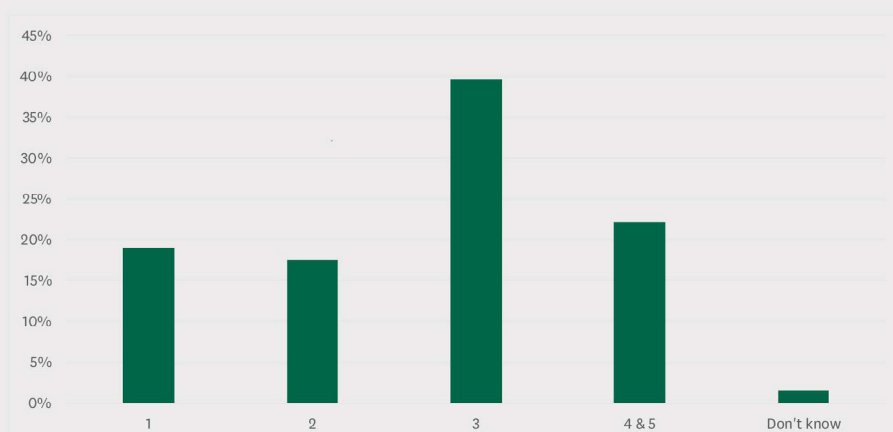
**Has there been a change in the culture of your organisation to make sexual exploitation and abuse less likely to occur?**

Source: International Development Committee survey

Our survey found that 46% of individuals with experience of the aid sector indicated they think there has been significant progress achieved on tackling the culture of the sector by selecting options four and five on the scale.

Graphs twelve to fifteen relate to the sector as whole.

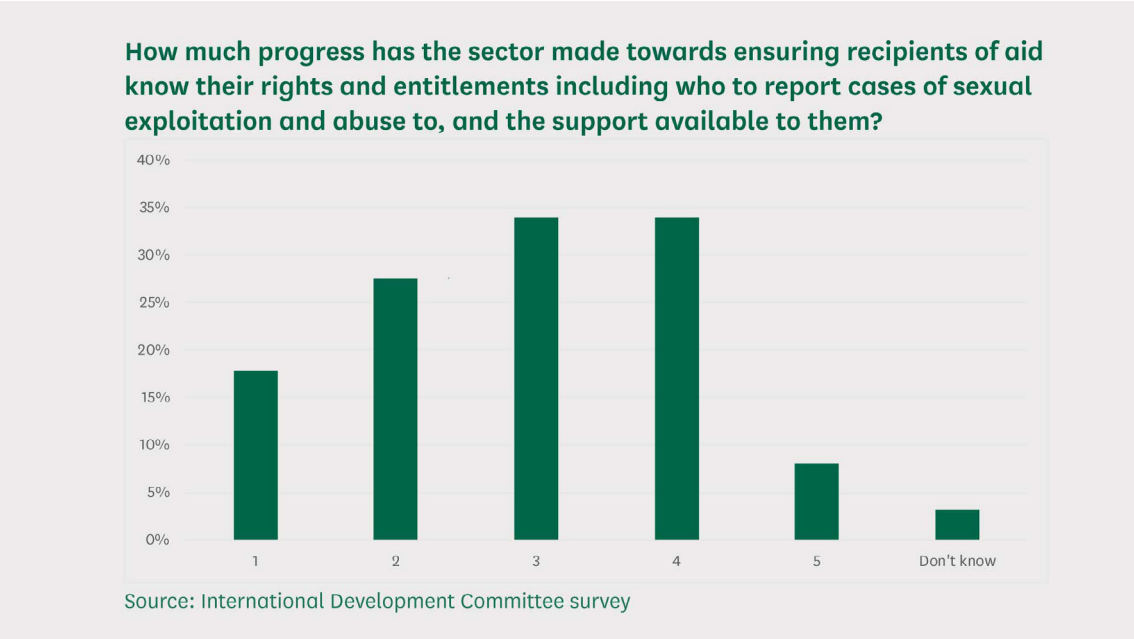
## 12.

**How much progress has the sector made to establish safe reporting and complaints mechanisms to enable instances of sexual exploitation and abuse of aid recipients to be raised?**

Source: International Development Committee survey

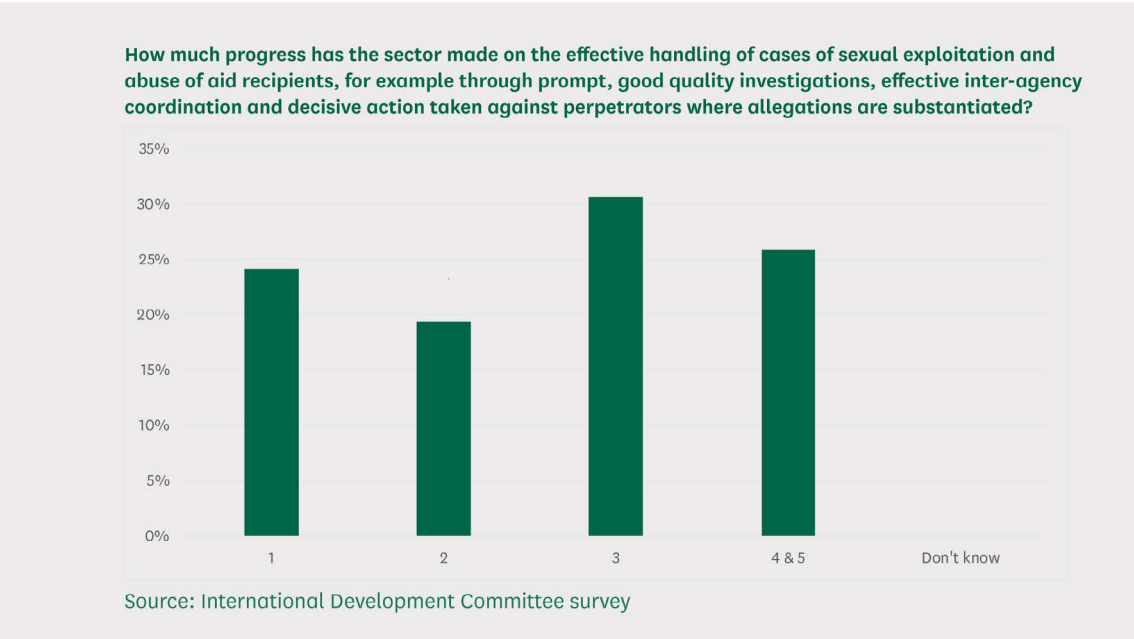
Only 22% of individuals selected options four and five to indicate that significant progress has been made. This indicates that the sector as a whole needs to make much more progress to establish safe reporting and complaints mechanisms.

13.



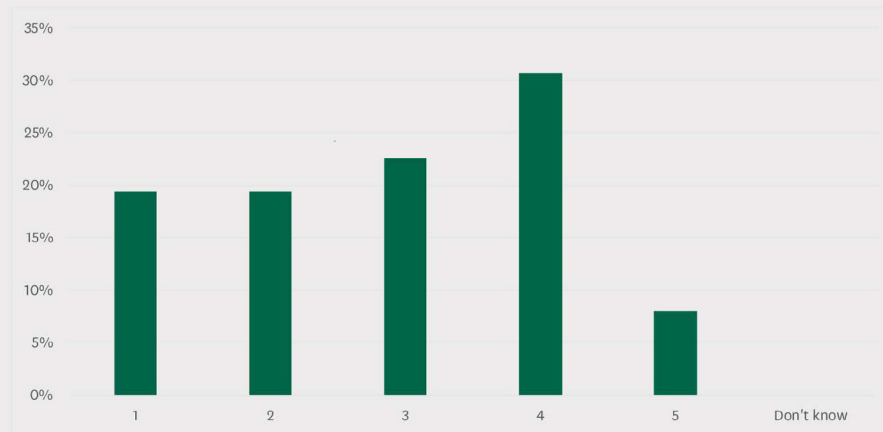
45% of individuals who responded to the survey selected options one or two, indicating that little or no progress has been made by the sector as a whole towards ensuring that recipients of aid know their rights and entitlements, including who to report cases of sexual exploitation and abuse to and the support available to them. This figure is higher than the 33% who indicated little or no progress has been made at their own organisation.

14.



Combining options four and five demonstrates that 25% of individuals who responded to the survey think that the sector as a whole has made significant progress on the effective handling of cases of sexual exploitation and abuse.

15.

**Has there been a change in the culture of the sector as a whole to make sexual exploitation and abuse less likely to occur?**

Source: International Development Committee survey

Only 8% of individuals who responded to our survey felt that the culture of the sector is as strong as it can be in order to make sexual exploitation and abuse less likely to occur. However, in addition to this, over 30% of individuals selected option four, indicating that more than a third of responders think that significant progress has been achieved since 2018.

16.

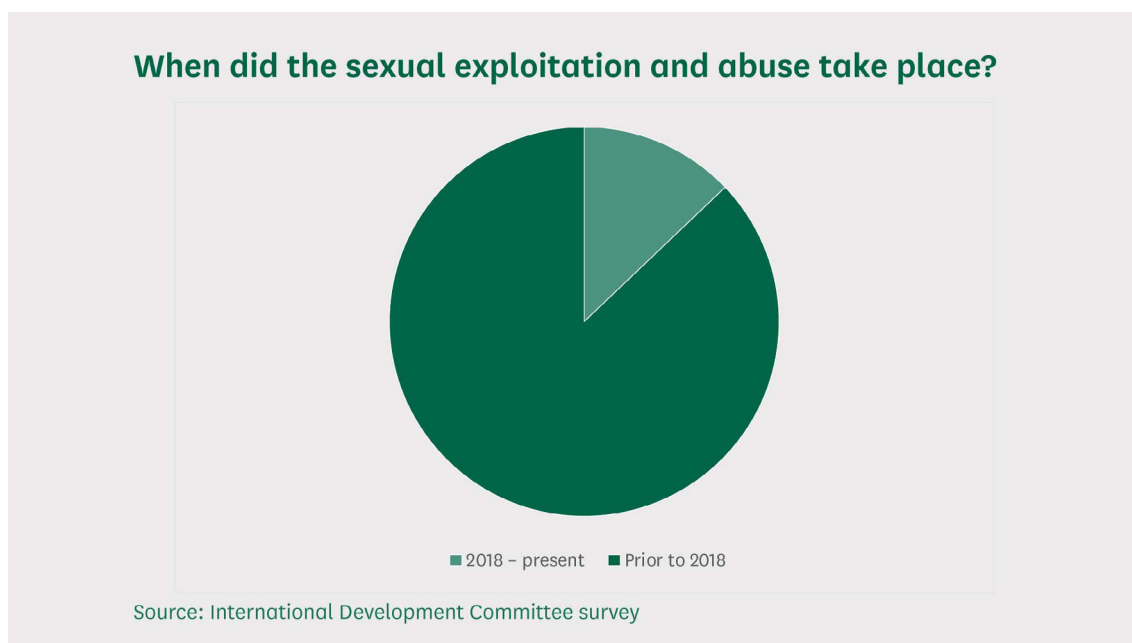
**Have you witnessed or observed suspected sexual exploitation or abuse of aid recipients?**

Source: International Development Committee survey

26% or about one in four of individuals who responded to our survey indicated they had witnessed or observed the sexual exploitation or abuse of aid recipients.

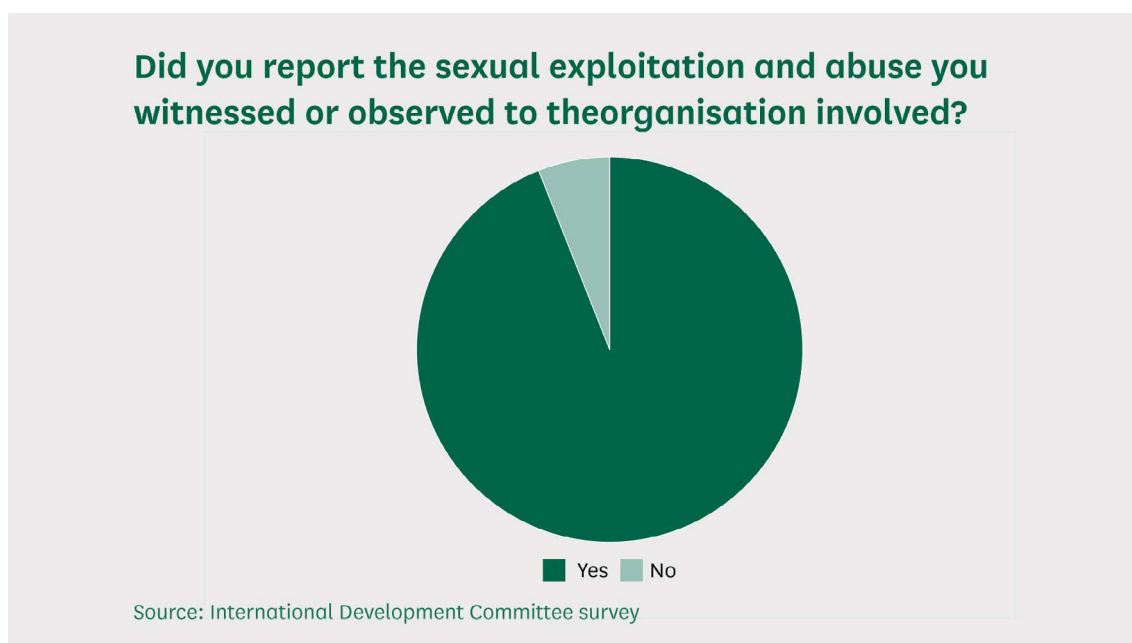


17.



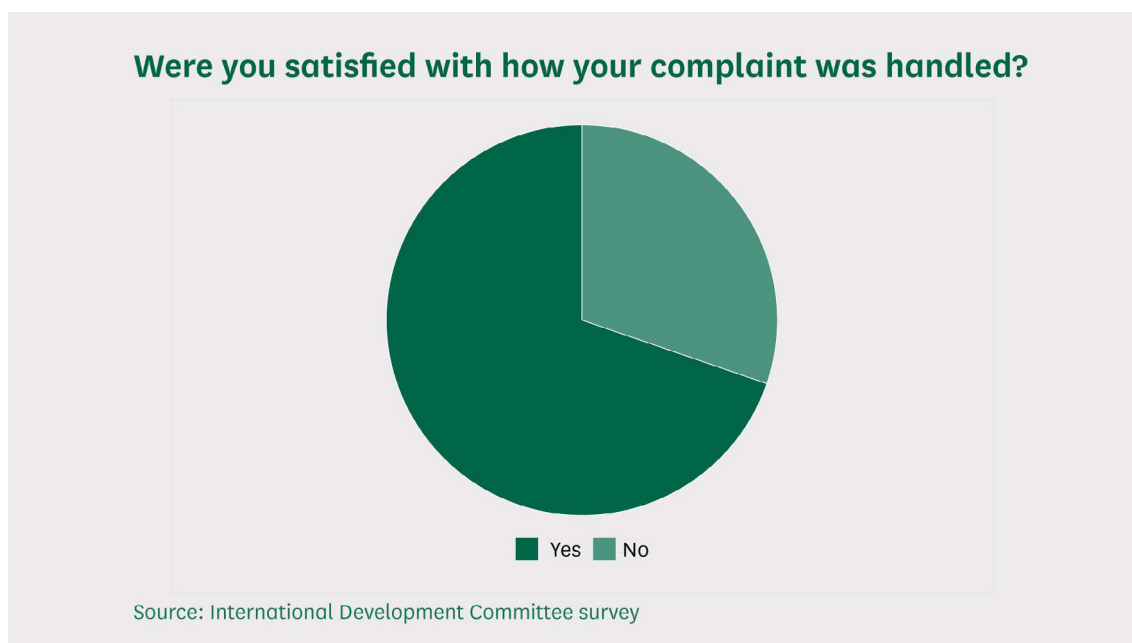
88% of individuals who said they have witnessed or observed the suspected sexual exploitation or abuse of aid recipients indicated that it occurred prior to 2018.

18.



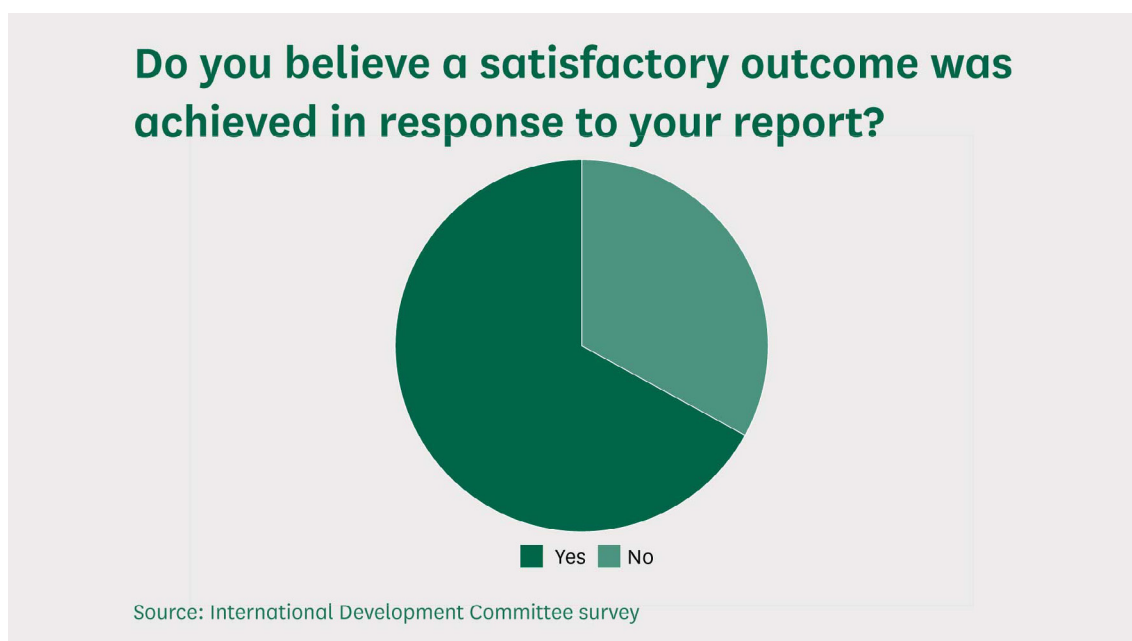
94% of those who said they had witnessed or observed the sexual exploitation or abuse of aid recipients said they reported it to the organisation involved.

19.



Two thirds of individuals who said they had reported the suspected sexual exploitation or abuse of aid recipients to the organisation involved were not satisfied with how their complaint was handled.

20.



Two thirds of the individuals who said they had reported the suspected sexual exploitation or abuse of aid recipients that they had witnessed or observed to the organisation involved do not believe that a satisfactory outcome was achieved in response to their report.

## Formal minutes

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**Tuesday 15 December 2020**

Members present:

Sarah Champion, in the Chair

Mr Richard Bacon      Mrs Pauline Latham

Theo Clarke              Kate Osamor

Brendan Clarke-Smith   Mr Virendra Sharma

Draft Report (*Progress on tackling the sexual exploitation and abuse of aid beneficiaries*), proposed by the Chair, brought up and read.

*Ordered*, That the draft Report be read a second time, paragraph by paragraph.

Paragraphs 1 to 140 read and agreed to.

Annex & Summary agreed to.

*Resolved*, That the Report be the Seventh Report of the Committee to the House.

*Ordered*, That the Chair make the Report to the House.

[Adjourned till Tuesday 12 January at 2.00 p.m.]

## Witnesses

The following witnesses gave evidence. Transcripts can be viewed on the [inquiry publications page](#) of the Committee's website.

### Thursday 16 July 2020

**Professor Rosa Freedman**, Professor of Law, Conflict and Global Development, University of Reading School of Law; **Dr Miranda Brown**, International human rights, safeguarding, integrity and accountability, Independent Consultant; **Alina Potts**, Research Scientist, The Global Women's Institute, George Washington University

[Q1–18](#)

**Frances Longley**, Co-chair, NGO Safeguarding Working Group on Leadership and Culture; **Sally Proudlove**, Co-chair, NGO Safeguarding Working Group on Leadership and Culture; **Sarah Maguire**, Director, Representative, Safeguarding Leads Network; **Jill Healey**, Co-chair, NGO Safeguarding Working Group on Accountability to Beneficiaries and Survivors; **Steve Reeves**, Co-chair, NGO Safeguarding Working Group on The Employment Cycle

[Q19–52](#)

### Tuesday 22 September 2020

**Megan Nobert**, Director, Safeguarding, International Rescue Committee; **Lucy Heaven Taylor**, Independent Consultant, Safeguarding; **Ester Dross**, Independent Consultant and Adviser, PSEA

[Q53–69](#)

**Sarah Blakemore**, Director, Keeping Children Safe; **Pierre Hauselmann**, Executive Director, Humanitarian Quality Assurance Initiative; **Tanya Wood**, Executive Director, CHS Alliance

[Q70–100](#)

### Tuesday 06 October 2020

**Edward Flaherty**, Founder and Senior Partner, Schwab, Flaherty & Associés; **Prof Andrew MacLeod**, Visiting Professor, Kings College London and Co-founder, Hear Their Cries; **Sienna Merope-Synge**, Human Rights Lawyer

[Q101–124](#)

**Shaista Aziz**, Journalist, Specialist on Violence Against Women and Girls and Co-Founder, NGO Safe Space; **Alexia Pepper de Caires**, Activist, Writer and Co-Founder, NGO Safe Space; **Paula Donovan**, Co-Director, AIDS-Free World's Code Blue Campaign; **Lesley Agams**, Writer, Lawyer and Social Entrepreneur

[Q125–130](#)

### Tuesday 13 October 2020

**Paisley Dodds**, Investigations Editor, The New Humanitarian; **Philip Kleinfeld**, Deputy Africa Editor, The New Humanitarian; **Nellie Peyton**, West Africa Correspondent, Thomson Reuters Foundation; **Robert Flummerfelt**, Investigative Journalist and Independent Researcher

[Q131–160](#)

### Tuesday 20 October 2020

**Diane Goodman**, Senior Coordinator, Sexual exploitation, abuse and harassment, UNHCR; **Hannan Sulieman**, Deputy Executive Director, Management, UNICEF

[Q161–183](#)

**Stephanie Draper**, Chief Executive, Bond; **Franziska Schwarz**, Senior Adviser, Sector Safeguarding, Bond; **Helen Stephenson CBE**, Chief Executive Officer, The Charity Commission for England and Wales; **Harvey Grenville**, Senior Technical Adviser, The Charity Commission for England and Wales

[Q184–211](#)

## Tuesday 03 November 2020

**Dr Tamsyn Barton**, Chief Commissioner, Independent Commission for Aid Impact; **Dr Jasmine-Kim Westendorf**, Senior Lecturer in International Relations, La Trobe University; **Dr Miranda Brown**, Independent Expert on Protection from Sexual Exploitation and Abuse; **Major Charmaine Geldenhuys**, Former UN Gender Adviser to the Democratic Republic of Congo

[Q212–230](#)

**The Baroness Helic**, Baroness Helic; **Dr Tamsyn Barton**, Chief Commissioner, Independent Commission for Aid Impact; **Dr Paul Kirby**, Assistant Professorial Research Fellow, Centre for Women, Peace and Security, London School of Economics and Political Science

[Q231–244](#)

## Tuesday 17 November 2020

**Rt Hon James Cleverly MP**, Minister of State for the Middle East and North Africa, Foreign, Commonwealth & Development Office; **Peter Taylor**, Head, Safeguarding Unit, Foreign, Commonwealth & Development Office

[Q244–289](#)

## Thursday 19 November 2020

**The Lord Ahmad of Wimbledon**, Prime Minister's Special Representative on Preventing Sexual Violence in Conflict and Minister of State for South Asia and the Commonwealth, Foreign, Commonwealth & Development Office; **Katy Ransome**, Head of the Gender Equality Unit, Foreign, Commonwealth & Development Office; **James Kariuki**, Multilateral Policy Director, Foreign, Commonwealth & Development Office

[Q290–309](#)

## Published written evidence

The following written evidence was received and can be viewed on the [inquiry publications page](#) of the Committee's website.

SEA numbers are generated by the evidence processing system and so may not be complete.

- 1 Alexia, Shaista Aziz and Alexia Pepper of NGO Safe Space ([SEA0025](#))
- 2 Anonymous (Anonymous submission A) ([SEA0027](#))
- 3 Anonymous (Anonymous submission B) ([SEA0030](#))
- 4 Anonymous (Anonymous submission C) ([SEA0031](#))
- 5 Anonymous (Anonymous submission D) ([SEA0032](#))
- 6 Anonymous (Anonymous submission E) ([SEA0033](#))
- 7 Bond ([SEA0013](#))
- 8 British Red Cross ([SEA0021](#))
- 9 Chairs of the NGO working groups ([SEA0023](#))
- 10 Chemonics International ([SEA0010](#))
- 11 DAI Global LLC ([SEA0014](#))
- 12 Department for International Development ([SEA0015](#))
- 13 Hunt, Caroline (C. Hunt-Matthes & Dr A Bushnell Joint Submission) ([SEA0029](#))
- 14 International Committee of the Red Cross ([SEA0018](#))
- 15 International Justice Mission UK ([SEA0012](#))
- 16 International Rescue Committee ([SEA0009](#))
- 17 Keeping Children Safe ([SEA0024](#))
- 18 Kings College London; Griffin Law; and Hear Their Cries ([SEA0011](#))
- 19 Liberty Shared ([SEA0005](#))
- 20 MSS GLOBAL LTD ([SEA0019](#))
- 21 Oxfam GB ([SEA0008](#))
- 22 Save the Children ([SEA0006](#))
- 23 Sightsavers ([SEA0002](#))
- 24 The Charity Commission for England and Wales ([SEA0022](#))
- 25 UNHCR - Annex A ([SEA0028](#))
- 26 United Nations Children's Fund ([SEA0026](#))
- 27 United Nations High Commissioner for Refugees (UNHCR) ([SEA0017](#))
- 28 VSO ([SEA0020](#))
- 29 Williams, Mrs Aneeta (International Safeguarding Consultant and PSVI Expert, Bridging Worlds Consulting Ltd) ([SEA0016](#))
- 30 World Vision UK ([SEA0004](#))



## List of Reports from the Committee during the current Parliament

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All publications from the Committee are available on the [publications page](#) of the Committee's website.

### Session 2019–21

Number	Title	Reference
First Report	Humanitarian crises monitoring: the Rohingya	HC 259
Second Report	Effectiveness of UK aid: interim findings	HC 215
Third Report	The Newton Fund review: report of the Sub-Committee on the work of ICAI	HC 260
Fourth Report	Effectiveness of UK aid: potential impact of FCO/DFID merger	HC 596
Fifth Report	Humanitarian crises monitoring: impact of coronavirus (interim findings)	HC 292
Sixth Report	The Changing Nature of UK Aid in Ghana Review: report from the Sub-Committee on the Work of ICAI	HC 535
Seventh Report	Progress on tackling the sexual exploitation and abuse of aid beneficiaries	HC 605
First Special Report	Follow up: sexual exploitation and abuse in the aid sector: Government Response to the First Report of the Committee	HC 127
Second Special Report	Humanitarian crises monitoring: the Rohingya: Government Response to the First Report of the Committee, Session 2019–21	HC 658
Third Special Report	The Newton Fund review: report of the Sub-Committee on the work of ICAI: Government response to the Committee's Third Report	HC 742
Fourth Special Report	Effectiveness of UK Aid: Interim Report & Effectiveness of UK Aid: potential impact of FCO/DFID merger: Government Response to the Second & Fourth Reports of the Committee	HC 820