

International Development Committee

Oral evidence: ICAI's review of the UK's approach to safeguarding in the humanitarian sector, HC 454

Tuesday 28 June 2022

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Members present: Sarah Champion (Chair); Mr Richard Bacon; Mrs Pauline Latham; Chris Law; Mr Ian Liddell-Grainger; Nigel Mills; Mr Virendra Sharma.

Questions 1 -70

Witnesses

[I](#): Sir Hugh Bayley, Commissioner, Independent Commission for Aid Impact; and Helen Mealins, Team Leader, Independent Commission for Aid Impact.

[II](#): Vicky Ford MP, Minister for Africa, Latin America, and the Caribbean, Foreign Commonwealth & Development Office; Peter Taylor, Head of Safeguarding Unit, Foreign, Commonwealth & Development Office; and Chris Taylor, Head of Internal Audit, and Investigations, Foreign, Commonwealth & Development Office.

Examination of witnesses

Witnesses: Sir Hugh Bayley and Helen Mealins.

Q1 Chair: Welcome to this session of the International Development Select Committee. It is a one-off evidence session based on ICAI's review of the UK's approach to safeguarding in the humanitarian sector. This is an area that the Committee has long had an interest in. We read your report with great interest. We were somewhat surprised by the response that came back from the Government, and we would like to pick away at that if we may.

I will ask you to introduce yourselves. Sir Hugh, would you like to start?

Sir Hugh Bayley: I am of the part-time commissioners for ICAI.

Helen Mealins: I am a member of the service provider team for ICAI and led this particular review.

Q2 Chair: It is lovely to have you in front of us today. Sir Hugh, can you summarise the main findings of the report?

Sir Hugh Bayley: Let me say very briefly in passing that I was supported by a very strong research team of eight people who between them had decades of experience working in humanitarian settings on safeguarding issues and that is reflected in the report.

On the key findings, we would say that to find out what works to reduce risks to vulnerable people in humanitarian settings, the Government need to systematically take advice from people receiving humanitarian aid, especially victims and survivors. Although they do that, they do not do it in a systematic way.

Secondly, the Government are absolutely right to hold aid workers paid for by UK taxpayers to account, but they have emphasised an upward accountability to the UK as a donor at the expense of downward accountability to the people we are seeking to help in humanitarian settings.

Thirdly, the Government have invested in human resources tools to prevent hiring or rehiring of perpetrators of sexual exploitation and abuse, but they are dealing with dozens, not hundreds or thousands, of individual cases and we know humanitarian aid employs more than 500,000 people globally. Of those cases that these HR instruments are addressing very, very few of them are locally recruited staff who are, of course, the vast majority of people who work delivering humanitarian aid.

Lastly, the safeguarding investigations team, which was set up four years ago, is still developing its systems. They made improvements while we were doing our study, some in response to questions we were asking them. For instance, we asked them to identify cases of sexual abuse against recipients of aid in humanitarian settings. They were initially



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unable to do so, and we had to trawl through a sample of cases and discover them ourselves. That has now been largely corrected, and they have a better way of classifying cases.

Q3 Chair: I find that somewhat staggering seeing as this Committee has uncovered many, many cases over the previous years. Could you tell us a little bit more? Is it because their database was not good enough, or because they were not recording properly?

Sir Hugh Bayley: That was the case when we were taking evidence, which of course is more than a year ago now. We asked that question because of the particular focus that this review has on humanitarian settings, and the particular vulnerability of people who receive humanitarian assistance. Their system did not allow them to do so. We therefore selected a sample of just over 300 of the 1,200, 1,300 cases that had been reported to FCDO in the first four years of operation, and we trawled through those to find out how many were cases of sexual exploitation or abuse against affected people—that is to say people receiving aid or people in the host communities of those receiving aid.

When we talk about the methodology—we might get further into the numbers if you want to, but for the purpose of brevity I would simply say that we are recommending that the safeguarding investigations branch does a thorough review after four years—that would be a good time to do so—and, this is not strictly in our review, but I have another public appointment as a lay member of the Nursing and Midwifery Council. They have been doing this work, a somewhat analogous job, for 100 years. They have more robust systems, inevitably so, but we think the FCDO would strengthen its investigations system if it were to look closely at how it operates at the moment. We have provided it with some of the initial data that we received suggesting areas that would merit attention.

Q4 Chair: Looking at those areas, are you satisfied with Government's response to your recommendations?

Sir Hugh Bayley: Frankly, no. I would say that compared to other ICAI reviews the response the Government made was poor. It is disappointing that only one of our five recommendations was fully accepted by the Government, and that is recommendation 4 on the employment schemes. It is not clear even from that response whether they take on board our concerns, particularly about these schemes dealing with locally recruited staff in any great numbers—in theory yes but not in practice

Of the other four recommendations that they partially accept, they do not say which parts they accept and which they do not. We, as you know, do a follow-up review in a year, and we would clearly like to know what they do accept so we can measure performance against those recommendations or parts of the recommendations that we have made.

Q5 Chair: I am somewhat blown away by this and from reading what amounts to a rebuttal of a lot of what you were saying, because this



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Committee has met the safeguarding unit, we have met the investigation team who are incredibly committed to understand this, and I do not think anything contentious came out in your recommendations. What do you think the resistance is? This Committee has been very clear that you need to have eyes and ears and empowerment on the ground, preferably with the women's organisations that are there, because it does tend to be women who are being exploited, and about the need for support for survivors on the ground. What do you think the block is, because Government have been very good on its PSVI, for example, and on its education for women and girls?

Sir Hugh Bayley: That is a question you will want to put to the panel that follows. All I would say is that I want things to change for the better; we all want that to happen. An ICAI review ought to be an opportunity for Government officials to reflect and learn and strengthen the delivery of the services they are delivering, and I hope the Government will reflect further following this hearing and signal to you where it is that they will take further action to enable them to measure impact.

I stress the word "impact". The Government have made this a high priority for four years, a relatively short period. They have introduced many new initiatives, which we commend, but it is early days. Where they and we differ is that there is no clear evidence that the initiatives that have been introduced over the last four years are significantly reducing the risk of sexual exploitation and abuse to affected people, refugees, displaced people and host communities in humanitarian settings. That must be the goal, to reduce risk.

Chair: I agree, thank you. Nigel Mills.

Q6 **Nigel Mills:** I see you have focused your review on humanitarian settings rather than on all the places where the UK delivers aid. Could you talk us through why you chose that focus?

Sir Hugh Bayley: Sexual exploitation and abuse are clearly unacceptable wherever they should happen. The Government pushed this policy strongly up the agenda, following reports four or five years ago about abuse by humanitarian aid workers. The risk of SEA is greatest in humanitarian settings for a series of reasons, which you will have addressed in your own reports. People are displaced and insecure, they lose privacy, often lose secure housing, they do not have a lock on their door or tent, and people are separated from their family, from community leaders, from familiar channels of redress. They are often in extreme poverty and economic vulnerability. They lose legal and citizenship rights if they move out of the country of which they are a national. There may be language problems or a whole series of reasons. ICAI has looked at SEA in other contexts. The Chair mentioned our PSVI report, but we decided with this review to focus on the aid recipients who are at greatest risk, and they are those in humanitarian settings.

Q7 **Nigel Mills:** That seems sensible to me. Do you think a partially-accept



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response from the Government is just a cop-out? They are usually just warm words and then they ignore everything specific. Is that a weakness in the system we have?

Sir Hugh Bayley: I hope they do not ignore everything. We have two opportunities to test what progress, what change is being made, and what impact that has on those at risk. Your hearings and your dialogue with Ministers and officials is one opportunity, and ICAI's follow-up report, which in this case we will do this time next year, will be inquiring on what changes have been introduced.

Some changes, I have to say, as officials will tell you in a few moments, since we put the pen down on our report that we published six or seven months ago—

Helen Mealins: No, in February.

Sir Hugh Bayley: Okay, I am getting confused.

Chair: Time disappears.

Sir Hugh Bayley: Certainly since we finished collecting evidence, which would have been six or seven months ago, changes have been made. That is something we welcome very much, but we need to be clear about what changes are being made and what difference that makes to people on the ground. Are the voices of those who are vulnerable being heard in a systematic way?

Q8 **Mr Virendra Sharma:** Helen, as part of this review you conducted telephone interviews with people in affected communities. What were the main overarching themes that you gathered from these interviews?

Helen Mealins: In the interviews we were trying to establish how much the affected populations understood about the issue of sexual exploitation and abuse by humanitarian aid workers, to understand whether they knew they had ways of registering cases or complaints and whether they knew the channels for doing that. We wanted to gauge their understanding of or their trust in those systems, to be responsive to any complaints made and to generally establish with the quantitative telephone interviews where they were addressing those complaints.

We did have the opportunity to do some more in-depth interviews with a small subsample and to gain some better insights as to why affected populations perceived those channels to be ineffective.

Q9 **Mr Virendra Sharma:** What impact have the restrictions on fieldwork during the Covid-19 pandemic had on your investigation?

Helen Mealins: The review overall was conducted remotely. There was no travel. Travel restrictions meant that every interview was conducted online. In talking to people in the three countries where we chose to investigate further the humanitarian responses, we did those interviews online.



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We had planned to hold focus group discussions with refugees in the camps in Cox's Bazar, the Rohingya population, but just as we were about to launch that research, the Delta variant spiked, the Government closed the camps, and it was not possible to have researchers move within the camps. We switched our attention to Uganda, and by coincidence that also spiked so we were not able to conduct those focus group discussions. What we were able to do, which was quite helpful, was to conduct the telephone interviews with those people who had telephones in the areas of the West Nile region of Uganda and southern Yemen, and to gauge their views through that telephone interviewing piece.

Q10 Mr Virendra Sharma: Do you have any plans to undertake the intended fieldwork in future to gather first-hand evidence from affected communities?

Sir Hugh Bayley: It is something ICAI routinely seeks to do with each of its reviews. We do not have plans about safeguarding to produce a supplementary report in six months now that it is possible to do fieldwork. On this particular review, the answer is we will not do face-to-face fieldwork.

Q11 Mr Virendra Sharma: I accept that but face-to-face interviews are not the same as on the phone with language difficulties, so it means there is not a true reflection of the situation. That is why I asked if there are any plans to fill the gap that was created due to Covid-19.

Helen Mealins: I think your first question was about when we gathered first-hand evidence. That was first-hand evidence by the interview method. Admittedly it did not reach those people who did not have phone access, and it may have been difficult for those people who were in refugee situations and unable to speak privately on the phone to respond to the survey. There were limitations but I would say that the evidence we gathered was first-hand and robust. The Government use telephone interviewing in Yemen to do their monitoring.

Q12 Mr Virendra Sharma: Are you happy with the outcome?

Helen Mealins: I think we have sufficient evidence from it to inform the review. There is always much more than could be done and as we point out in the review, the more engagement with affected people and populations to inform policy and practice the better.

Q13 Chair: I do agree and echo Virendra's points, not least because it is often the word as you are stepping out of the room that is the most powerful one. Have you fed back the results of your report and the Government's response to it to the people that took part?

Sir Hugh Bayley: Yes.

Helen Mealins: We have fed back the response on the surveys to those people that were involved in the interviews, yes.



Q14 Mrs Pauline Latham: Before I ask my question, could I just follow up on that? If you are doing interviews by Zoom, it is a fairly self-selecting audience because not everybody in humanitarian situations will have access to Zoom. How do you reconcile that with your report, because there will be some people and groups of people in certain situations you will never have spoken to?

Sir Hugh Bayley: We did not do the interviews with citizens, the members of the public, by Zoom but by telephone, although some of your concerns obviously apply. Not everybody has a telephone. We wanted to do telephone interviews in Bangladesh, but very few of the Rohingya refugees in Cox's Bazar have telephones as a matter of Bangladesh Government policy, so we switched our attention to Uganda and Yemen where there is much wider use of telephones by refugees and displaced people.

I take your point and had Covid not prevented it, we would have done face-to-face, in-person, interviews. However, having said that, there are some pros to telephone interviews—as opposed to doing focus groups, which was what we had initially intended—because people are talking one-to-one and talking, I have to say, in their own languages. We did not conduct these interviews in English, we conducted them in the languages of the communities we were interviewing.

Q15 Mrs Pauline Latham: I have some concerns about focus groups. Surely one-to-one is much better. Focus groups mean people are in groups by nature of the term, and therefore less likely to open up in public about their experiences. They are much more likely to open up if they are one-to-one. You still have not talked to the Rohingya one-to-one or even in focus groups, which I have to say I have difficulty with, so you missed out a raft of people who are pretty important.

Sir Hugh Bayley: Yes, is the answer to that, although we did substitute. Had our initial intention of doing face-to-face fieldwork with Rohingya refugees happened, we would not have done the fieldwork in Yemen and Uganda. We engaged in the field with people on the receiving end of humanitarian aid as far as was possible given the constraints of Covid.

Q16 Mrs Pauline Latham: Obviously it was difficult, but I have to say the methodology of focus groups worries me because people will not open up if there is a group sitting around in a circle talking to somebody from a different community. People are not going to open up to you in the way that they would if you had one-to-one meetings.

Sir Hugh Bayley: Again, I think there are pros and cons. You are absolutely right that some people will not disclose. One of the things we learnt from the study is that how you engage with people receiving aid in affected communities is highly context-specific. We had very different results from the 300 we interviewed in Uganda compared with the 300 in south Yemen.



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The social pressures preventing women from talking about sexual issues outside the family in southern Yemen were enormous and shaped the results even in one-to-one telephone interviews. People were more open to talking, and were clearly discussing in the community risk factors such as women being asked for sex in return for work with aid agencies in Yemen.

Methodologically it is not a matter of one size fits all, we needed to adapt our methodology to the community and values that we were trying to obtain information from. There certainly are cases where women will be less likely to talk in a wider group than one-to-one, I accept that.

Chair: On the subject of talk, we have 15 minutes.

Q17 Mrs Pauline Latham: One major point arising from the review is the importance of consultation with affected people, which we have just been talking about. In your view, how much has FCDO policy and practice on safeguarding been shaped by consultation with affected people?

Sir Hugh Bayley: We think it is patchy. After all, the policy is for there to be a survivor-centred policy. Where you do get consultation, it may not be at a level that engages with individual people. It may be at a fairly high level. We found that to be the case in Uganda where there was a consultation forum, but it was a pretty high-level body that ordinary citizens would be less likely—in the Uganda refugee engagement forum, it was not clear that there were many—how can I put it?—ordinary citizens attending.

We did not judge from the evidence that we received from hundreds of documents and interviews with individuals that this was happening systematically. It is partly because of this top-down, bottom-up problem that the reporting requirements to the donor do take precedence for the implementing agencies over putting time and effort into consulting with the people they are seeking to help.

Q18 Mrs Pauline Latham: How could the FCDO strengthen its work on consulting affected people in the future?

Sir Hugh Bayley: Implementing agencies collect a lot of information from the people they are trying to help. I would have thought they should systematically get that information from the field fed back, and it should be used to build up a picture of where the dangers are and what good practice responses look like.

Q19 Mr Virendra Sharma: Helen, which groups of people are most at risk of SEA in humanitarian settings?

Chair: Bullet points, please, Helen.

Helen Mealins: Women and girls are identified as the group most likely to be vulnerable to sexual exploitation and abuse in those settings, particularly women who are living alone or heading up households and do



not have a responsible adult male protector present. Refugees and internally displaced people are also vulnerable for the reasons that the commissioner has mentioned, being outside their own jurisdiction and without networks and support. Then unaccompanied minors and people living with disabilities are all part of the vulnerable groups, as are men and boys who tend to get overlooked in these circumstances and people who identify as lesbian, gay, bisexual, transgender and queer.

Chair: Everyone.

Helen Mealins: Everyone is vulnerable in those circumstances, in a humanitarian emergency, yes, I would contend that they are. I would say that women perhaps more so.

Q20 **Mr Ian Liddell-Grainger:** Following that, in the review you said that people who have problems with SEA are very reluctant to come forward and they are very reluctant to report the aid agency systems. That begs the question why and what can we do about that? What can we do to support them and also help them to report this?

Helen Mealins: The reasons are very contextualised. What we know from the literature review is that there is a fear of stigma of using the reporting mechanisms and a lack of trust in those donors who provide those reporting mechanisms. There is a fear of loss of aid. There was a quote in the literature review that if she named the NGO worker she had sex with then she would lose the ability to feed her child. There was evidence that people are reluctant to come forward for that very reason.

In Uganda, through our telephone survey, we discovered that people had a preference for talking to people that they trusted, and to their local community representative rather than perhaps a more distant donor representative. There is a range of reasons there.

As for what can be done differently, look at each context and understand the barriers to reporting. Do that analysis early and frequently and then engage differently.

Q21 **Mr Ian Liddell-Grainger:** Following on from that, the FCDO has a major role to play in this. What does it need to do to change the culture, which is what you are saying needs to happen, to make people feel included and to penalise—you gave a very interesting example there—aid agencies that are still not quite getting this message? It is embarrassing at every level, and it is horribly nasty for the people involved.

Sir Hugh Bayley: As Helen says, the way to do it may differ in different places. Certainly, our fieldwork in Uganda made it clear that the humanitarian aid providers and the FCDO need to work closely with community leaders, maybe local authorities, and maybe the local police, who are all rated by those we spoke to as more approachable than the aid agencies. In other words, putting a complaints box in the head office does not work. You have to find out who people are willing to approach and share information with, and use them as proxies and look at the



barriers by consulting local people in each situation, and make a bespoke complaints mechanism that responds to their needs and their preferences.

- Q22 **Mr Ian Liddell-Grainger:** Take Uganda as an example. It is a Commonwealth country, we all know it well and, Hugh, you know it extremely well from your time here; they are friends of ours, good friends of ours and we have helped them immeasurably. They have a very sophisticated parliamentary system. They work much the same as we do, yet you are painting this rather disparate picture of where there is a disconnect—I am not saying particularly from their Parliament—but a disconnect from what we can achieve because we cannot get the complaints box on the table.

Are we using enough of the internal government structure in Uganda to try to help us smoke out bad practice, and also where people are left vulnerable that we can support them using Ugandans themselves and the systems they have?

Sir Hugh Bayley: Using the results of our survey I think not. People receiving aid were saying we would be happier going to talk to a Ugandan policeman. We would be happier talking to our own community leaders or maybe representatives of a provincial council or local authority officials. If that is the view, then of course we should use them as a channel of communication. We should work with them—perhaps that is a better word than use them. We should work with them and use the relatively higher trust that people receiving aid have in those institutions.

- Q23 **Mr Richard Bacon:** I am somewhat gobsmacked that these folk find it easier to go to a policeman or a politician than they do to a representative of one of the agencies that are there specifically to help them. It would be almost beyond belief, except that you are saying it and you would not be saying it if it were not true.

Sir Hugh Bayley: They are saying it, that is the thing. Also, remember that on the other side of the coin is the danger of reporting a serious criminal offence to the body that is feeding you. The complaint may be against the man who provides you with your cash, wheat or food. You can understand why sometimes people will go to a body other than the one they are complaining about.

- Q24 **Mr Richard Bacon:** Sure, there would be a case for direct labour where FCDO or DFID, as it was, employed its people to go out to the countries concerned and do the work rather than contracting out.

One of the things you said in your review was that there was a lack of real-time information on reports of SEA in the field. Can you say why this was and what could be done to increase the quantity and the quality of real-time reporting?

Sir Hugh Bayley: It is essential to have timely information if you are going to adapt your system promptly to close off risks. Because this is a



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difficult issue to talk about, implementing partners are often unwilling to share information.

Q25 Mr Richard Bacon: Just to be clear, when you say “implementing partners”, you mean the contractors who my constituents, as taxpayers, are paying for under a contract from FCDO?

Sir Hugh Bayley: Yes.

Mr Richard Bacon: You mean those implementing partners, do you not?

Sir Hugh Bayley: Yes.

Mr Richard Bacon: They are unwilling to share information?

Sir Hugh Bayley: The UN agencies who take a large proportion of your constituents’ aid money have developed a system for sharing data. It is not perfect but it is certainly a good step in the right direction, but this is not happening systematically. We heard, for instance, in Bangladesh during our virtual field visit—the preventing SEA co-ordinator sometimes heard about cases of abuse from London, because the reporting requirement to London meant the information was through there rather than hearing it locally on the ground.

This again is a problem with a top-down approach. That is a problem that needs to be addressed. People need to be encouraged to share information locally as well as to report up the line to those who are funding it.

Q26 Chris Law: To follow up on that, Hugh, the question that jumps to my mind is that there have been significant cuts in the last couple of years—more than one-third of the budget. Do you think that has had an impact on the quality and quantity of safeguarding reporting and the measures around it?

Sir Hugh Bayley: In terms of the overall level of funding, that is something you need to put to the next panel. We saw in the Government’s response that they were saying they encourage agencies, especially smaller NGOs, to apply for funding to do their safeguarding responsibilities. Yes, they do encourage, but they do not always get the funding. We heard from a number of not-for-profit agencies that their funding was squeezed, and that what funding they had available was absorbed by the upward reporting requirement, leaving them with less resource and less time to talk with those they were aiding to understand their perspective of the problem.

There was one case I remember where they had applied for funding and it had been turned down. Encouraging people to apply for funding is not the same as providing the funding they need to respond energetically locally, and to listen to the views of those who are directly affected.

Q27 Chris Law: To follow on from that thought, I was on this Committee when Oxfam was in front of us giving evidence about the reports about



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sexual exploitation and abuse in 2018. The UK Government cut its funding as a result, looking for marked improvements, which it has since developed and it has still not got any funding. Do you see that as part of the problem rather than the solution and should the UK Government then intervene?

Sir Hugh Bayley: I cannot come here as an advocate for a particular agency.

Chris Law: It is just one example.

Sir Hugh Bayley: Let me say that this morning I went to a memorial service across the way at St Margaret's for Frank Judd. Sir Jeremy Greenstock gave a tribute to him and this is what he said, "He—Frank Judd, who was a former director of Oxfam of course—wanted to bring things to a decision, to see things taken forward not just ticked off as having been considered". That for me is a challenge to the Government.

We have produced a great deal of evidence and shared it with them, and indicated ways in which we think they could further strengthen their response to safeguarding. The question is this: are they going to note it and tick it off? Will they give it a tick as having been considered, or are things going to change? That is a more general challenge I would make to them.

Q28 **Chair:** I know, Sir Hugh, that you have taken a very personal interest in this. When you started the journey to where you are now, have you been surprised? What have you learnt?

Sir Hugh Bayley: I have learnt a lot on the way. I have learnt that taking initiatives that you think are going to improve the situation is one thing, and a lot of that has gone on in the last four years, but testing out what actually works, whether the money is being spent in ways that do the most that it could to reduce the risks of SEA, needs to take place. To say that you are doing something is not the same as demonstrating that you have had an impact.

There are civil servants—somebody mentioned this earlier—very dedicated civil servants, who are trying to change the way this problem is dealt with. We need to measure the impact to know whether the responses are the right responses and are significantly reducing the number of people—largely, but not solely women and girls—who suffer abuse, sometimes quite horrendous abuse, when they themselves are in a position of vulnerability that people like us can hardly imagine.

Chair: Thank you both for this report and I am sure you will listen with interest to our next panel, which is Minister Ford. I will briefly pause this session while we bring our second panel in.

Examination of witnesses

Witnesses: Vicky Ford MP, Peter Taylor and Chris Taylor.

Q29 **Chair:** We are now starting our second panel. We are very pleased to be joined by Minister Ford. Minister, I know you have a statement that you would like to make, but I wonder if before that you could introduce the team you have brought with you today.

Vicky Ford: Yes. I have two brilliant Taylors: Peter Taylor, head of safeguarding, and Chris Taylor, the director for internal audit and investigations. They have been at the forefront of looking at the detail of all these areas.

Chair: Minister Ford, over to you for your statement.

Vicky Ford: Thank you very much to all members of the Committee for giving us the opportunity to discuss this very important topic with you. I know that many of you have been looking at this in great detail, some since 2018, and I am very focused on tackling sexual exploitation, abuse and sexual harassment. The contribution that individuals on this Committee and that you collectively have made has had a real impact. I am very grateful for your continued engagement.

We would also like to thank Sir Hugh and all ICAI involved in producing the report. It does provide some very valuable insights and material that we can and will build on.

As you know, sexual health, exploitation and harassment can affect men as well as women, but the majority of those affected are women and girls. The Government have provided freedom for women and girls, and a key part of our international development strategy, which was published just last month, includes driving international action to end gender-based violence. Survivors are at the heart of our approach, and we always also prioritise those most at risk.

Incidentally, just as an aside, another key part of the international development strategy is helping countries get the investment that they need. I hope that you noticed yesterday's massive announcement made by the UK, US, EU and Japan of \$600 billion for investing in infrastructure globally. It is a real alternative to belt and road. I am going to go back to the subject, but I just wanted to say that.

Chair: Minister Ford, while that is a wonderful sales pitch and we are grateful, we are on sexual harassment.

Vicky Ford: On sexual harassment—I do think it is important, though, because where we invest in international development we reduce risks. We can make places more prosperous, more peaceful and reduce risks. So they are, in a weird way, linked.



Sexual exploitation, abuse and harassment are still occurring far too frequently in the aid sector. It is a long-term and very difficult challenge. We in the UK have been at the heart of tackling these issues head-on since 2018, and as set out in our 2020 safeguarding strategy and in the IDS, we will continue to do so.

We cannot think of another country that has done as much as the UK since 2018 to drive progress at international, national and local levels. We know a sustained effort is needed and that the FCDO can further strengthen our approach. We are committed to learning and driving more progress to help keep vulnerable people safe from sexual harm. The situation in Ukraine is just one more reminder of how incredibly important this effort is.

Most importantly, I would like to acknowledge the courage of all the victims, the survivors and whistleblowers, because through them telling their stories we can try and bring an end to these terrible acts. Thank you.

Q30 Chair: Thank you. On behalf of the Committee can I add our voice to your comments around survivors, victims and, indeed, whistleblowers who so rarely get the protection or indeed the respect and recognition that they deserve?

Minister Ford, we were together on the Women and Equalities Select Committee and I know what a passionate champion you are on this topic. You understand it, you get it, so I am somewhat surprised that of the five I think very reasonable recommendations the ICAI report made, FCDO has only accepted one, and only partially accepted the other four, and it has given no clarity on which bits of the partial they have or have not accepted. Why is that?

Vicky Ford: The ICAI report does recognise the Department's strong commitment to and investment in safeguarding. It notes the appropriateness of our safeguarding strategy, our instrumental role in global leadership and many, many positive contributions. The report also goes on to show how these contributions have reduced, and continue to reduce, the risk of sexual exploitation, abuse and harassment.

The report gives many examples of the work that we have done, including making sure that the number of cases reported has more than doubled since 2018, which means that more perpetrators are being caught. Over 140 high-risk individuals have been protected from working in the sector due to the misconduct and disclosure scheme.

The report also quotes organisations that say that they have strengthened their own approach as a result of our work. It gives thanks to our central assurance assessments in 2018 and 2019, which meant that NGOs made literally hundreds of improvements. They give all these positive elements.

Q31 Chair: What do you not like; why have you not accepted it?



Vicky Ford: The report also gives scores that we do not believe align with the content of other things that they are saying, for a number of reasons. It examines three areas: relevance, coherence and effectiveness. There is strong evidence that the FCDO has given a positive contribution to each of them, and despite saying, "You have made a positive contribution in everything that we are marking" those areas have been given amber/red scores.

Also, the report marks us down in each of these three areas on what we think are relatively minor issues. We do not think that the issue of SEA is at all minor. It is not a minor issue. But they mark us down on some minor issues. Sometimes some of those are on issues where there has been a misunderstanding, sometimes an error.

There are inaccuracies in some of the elements of the report. For example, it says our case management system does not prioritise the most serious cases. It does. It says our approach is top-down. It is both top-down and bottom-up. We absolutely work and support NGOs to give them training, to give them access to funds for communications, and to set up reporting mechanisms. It says that our system does not give evidence to allow learning from mistakes, but we say feedback is absolutely key in this. In some parts of the world, it can be very difficult to get that feedback. We need to recognise that. But we absolutely do prioritise trying to get the feedback and establish internationally a way to share that information. We have established international fora as well.

We think those are inaccuracies. We completely agree about items to improve on, and we accept part of them, but we will not accept parts that we think are inaccurate or based on misunderstanding or lack of clarity.

Q32 **Chair:** But in terms of the message that it sends out, would it not have been better to accept the recommendations and put the clarifications alongside it?

Vicky Ford: We have partly accepted all of them but we will not accept—

Chair: But you did not explain what bits of it you were and were not accepting. If they were just minor details, it looks as though you are more rejecting than accepting in the way that it has been presented.

Vicky Ford: I would disagree with that. We gave quite clear feedback on the elements of what we did and did not agree with. We have given a long and detailed explanation. We have not disagreed with any of it; we have just said we partially accept part of their recommendations.

Chair: Overall, you are accepting the report?

Vicky Ford: We accept the main premise that this is an important piece of work on which more work needs to be done. We accept obviously the bits where they say we have a strong commitment, but we cannot accept some of their conclusions that are not based on fact.



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Chair: You will accept the compliments but not the criticism.

Vicky Ford: No, we will accept the criticism where the criticism is fair and is fact but, for example, I will not accept a criticism that says the FCDO only has a top-down approach. We do not. It is not true. It demeans all those in NGOs on the ground who are prioritising and protecting vulnerable people from sexual exploitation.

Chair: I hear what you are saying, Minister.

Q33 **Mr Richard Bacon:** In order to avoid fruitless discussion in a Committee hearing about whether the report before the Committee is accurate or not, the Public Accounts Committee insisted many years ago that the Department that was the subject of scrutiny by the National Audit Office, and the National Audit Office, went through the report in what is known as a clearance process. At the end of that, the Permanent Secretary and accounting officer had to sign the report attesting to the accuracy of the facts in the report.

There will of course be differences in interpretation, but in the 16 years that I sat on the Public Accounts Committee, I never encountered a discussion about whether something in a report was factually accurate or not. Of course we took a lot of evidence from National Audit Office reports on different matters in those days as well, but I never encountered anyone suggesting that there were factual inaccuracies. Has anyone suggested that there should be a similar clearance process so that we do not end up having Committee hearings, like this one, where we are discussing whether something is true or not—

Vicky Ford: It is a very important point, okay.

Mr Richard Bacon: —either from the FCDO side or from ICAI, because this is not a new problem. The NAO system, which the FCDO has taken part in as has DFID, has found a way around it.

Vicky Ford: I will let my officials take you through some of what was happening in the background. As I said in the beginning, we welcome the work that has been done on the report. It is a very valuable insight. There are some factual inaccuracies and we believe that some of the conclusions did not necessarily impact what was said elsewhere in the report. We think this is also a very important area where we must continue to keep the focus.

We did go back to ICAI to ask it if it would change some of the areas where we felt the report was not as clear or as accurate as we thought it should be. ICAI chose not to do so. That is why in some areas we can accept and in other areas we—

Mr Richard Bacon: I fully understand but—

Vicky Ford: We also recognise that sometimes people are working in some of the most challenging parts of the world, so this is not like trying



to do an audit report on some things that would be happening in much more developed situations.

Peter Taylor: We went through the usual fact-checking process with ICAI. We sent back a lot of comments—well over 100—saying we thought there were factual inaccuracies. We had a reply saying, “Thank you, we have taken on board some of them but some we are not taking on board” and that was it.

Q34 Mr Richard Bacon: Is there no formal clearance process that requires the Permanent Secretary to attest to the accuracy of the report?

Peter Taylor: No, there is not. Sir Hugh and I have had this conversation since. I think there could be improvements made to the ICAI process to ensure that we do not end up in this situation. Of course there are differences of opinion, but we strongly believe there are some very significant factual inaccuracies that underpin the recommendations and the problem statements as set out in the report.

Q35 Nigel Mills: You did not like a score of amber/red. What score would you give your Department’s performance, Minister?

Vicky Ford: I think we are working in an area where we should never give ourselves a green light—never, because that would suggest that we had managed to overcome all the risks. We have not.

If you were trying to compare what the FCDO has done with what other countries have done in trying to tackle this with our partners—if it was a comparative scoring—you would definitely say we should not be at the bottom of the class. We have done more on this than others, particularly I think on the misconduct disclosure strategy. I hear how many different organisations and different countries are now using that system to identify potential perpetrators and remove them. That is a massive improvement.

Maybe amber would be fair throughout, but saying amber/red suggests we are not focusing on that, and I do not think that is reasonable. We are focusing on it, but it is not perfect.

Q36 Nigel Mills: Your opening statement quite rightly said there is still far too much of this happening around the world. That implies a bit of red, does it not?

Vicky Ford: I would say what flashes a red light is the number of enormously violent and dangerous humanitarian situations that are happening around the world where you have incredibly vulnerable people. When people are at their most vulnerable, they can be exploited. That is why, for example, I met the head of the UK’s Charities Commission very soon after the situation in Ukraine started, and asked her to look at everything that was happening as far as we could with UK organisations near the borders of Ukraine, to make sure their safeguarding strategies



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were out there. The situation arises; the sad fact is that people who want to abuse the most vulnerable will try to do so.

What is flashing red is the number of dangerous situations in the world. How we try to make sure that the humanitarian response minimises the risk of extra harassment and extra risk is key.

Peter Taylor: ICAI's rating system—amber/red—is saying we are not making a positive contribution. I agree with what I heard Sir Hugh say earlier about impact. Of course it is hard to measure the impact. As the ICAI's report says, there is no baseline data. We do not know how many cases there were in 2017 in Uganda or in any of the countries that they looked at. It is very hard to measure impact. But to say that we are not making a positive contribution feels slightly strange given everything that we have done.

There is a long way to go. We are finding out whether what we are doing is going to have the maximum impact. We are learning that all the way along. But we were slightly perplexed by the text, which gave the impression that we are making a positive contribution. Examples are given of how we are changing things at an international and national organisational level, and yet because of what we thought were fairly minor issues we ended up with an amber/red rating. I do not want to spend too much time talking about that. I think the issue is the substance and how we make a difference.

On which bits of the recommendations we do not agree with, and whether we can be clear about which bits we only partially agree with, one of the problems we found with the report is that if you look at the problem statements that try to explain the recommendations, there is no clear correlation. The wording of the recommendations is contradicted by relevant bits of the text.

Q37 **Mr Richard Bacon:** A very quick question on the lack of baseline data not just five but 10, 15, 25 years ago. Is it a huge leap of imagination to suppose that when this was not on anybody's radar, as it has become quite rightly in recent years, there was a lot more of it going on than there is now, and that therefore it is highly likely that you are right in saying you are making a positive contribution?

Peter Taylor: Yes, I think so. Take Uganda. The data ICAI found—Chris can correct me if I am wrong, but I think we had zero cases on the DfID books and I do not know about the FCDO, of sexual exploitation, abuse and harassment in Uganda in 2017. We now have 20 or so reports of that over the last few years. We are seeing more reports, which I think is a good sign that things are being talked about. As a result of them being talked about, we will catch more people because of the culture change and so on and the overall incidence should go down.

Q38 **Chair:** Mrs Ford, I want to use your example of Ukraine because I know that you have done a lot on this. I was mortified that child traffickers and



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child abusers were on the borders round about the same time as the aid agencies were there. Using that specific example, and the meetings that you had with the UN to put those protections in place, a green for me would have been that that would have been an automatic response that as soon as war broke out, and we worked on the principle that there would be very vulnerable children. Do you feel assured that that was the case or do you feel that because you intervened we had that protection?

Vicky Ford: I would say, and officials can correct me, that we would always expect all our humanitarian partners to have safeguarding procedures in place.

Chair: In that particular example?

Vicky Ford: In that particular example, that is the same wherever. At the beginning of the war in Ukraine, we saw quite a lot of people who were not part of known humanitarian organisations trying to help. The conversation that I had with the head of the Charities Commission regarding the UK was whether they could absolutely make sure that we were working with known humanitarian organisations. That is why, for example, we were giving UK people the advice to contribute through the Disasters Emergency Committee fund rather than less formal routes, unless they knew where those less formal routes were spending the money.

The conversation I had was, "Please can you reinforce your message to our UK charities about the importance of safeguarding", especially if they were charities that would not necessarily have been involved before in that sort of situation. We saw lots of informal charities suddenly saying, "Can we go and race there and help?" so we reminded everybody throughout that they needed to do that and have their eyes and ears for some of these less formal organisations. It was just moving very fast and, as you say, what we were hearing about the child traffickers and women traffickers was shocking.

Let us not get too hung up on the niggles. One of ICAI's recommendations was that we should develop a research agenda on protection against sexual exploitation and abuse. We agree that there are gaps in evidence, but I do not agree I need to start a new programme. I have a very good FCDO research and development programme. It is called "What Works to Prevent Violence against Women and Girls", and has done a number of different projects around the world. I would like to see more of that going into these sorts of humanitarian situations rather than start a new programme. I do not disagree that there is an issue, but how we solve it would be slightly different.

Chair: We hear that.

Q39 **Mrs Pauline Latham:** ICAI found that FCDO "lacks systemic ongoing engagement with crisis-affected people, especially victims and survivors of SEA". What is your view of that assessment?



Vicky Ford: Listening to survivors and victims is absolutely key. It is absolutely central to our work. We always try to use survivors' experiences to shape policy. We require any organisation that is receiving FCDO funding to make sure that beneficiaries—those affected—and other local stakeholders are aware of their policies, and that they are aware of how to manage SEAH.

We also provide lots of different ways for them to engage affected populations and to engage, in particular, survivors.

Q40 **Mrs Pauline Latham:** Can you give me an example?

Vicky Ford: We have a new system, the Loop system. It is a new digital reporting platform. It is enabling recipients of aid to report concerns, including SEAH. It is working in real-time. It is in Zambia, Somalia, Poland and Ukraine. It is new. We are piloting it. We are rolling it out.

We also provide a fund, the ICVA Community Outreach and Communications fund. That is helping grassroots NGOs to produce communications materials locally to engage with local people. Those are two examples of the type of work that we do.

Q41 **Mrs Pauline Latham:** May I just interrupt there? In terms of the example of this digital platform that they can report things on, how do the Rohingya people in Cox's Bazar do that?

Vicky Ford: Peter, do you want to come in more on how that is happening? It is a difficult situation.

Peter Taylor: I think as you were discussing in the earlier session, you have to look at individual situations and you have to provide multiple channels and opportunities for people. A digital platform that allows people to report in many different ways may not work for everyone. It is not universally available just yet. We are piloting it there.

In any humanitarian crisis, there are established systems that will be a protection against sexual exploitation and abuse network. There will be a co-ordinator, there will be multiple ways of reporting and engagement with women's rights organisations, with local actors as well, and maybe individuals who are being affected will report to them rather than direct to a donor. We have to have multiple ways of reporting; no one size fits all.

Vicky Ford: Our standard says that anybody who is a recipient of our aid funding needs to be accountable to the affected population. That is part of the conditions of them working with us.

Chris Taylor: I will touch on what Peter went through, and on top of that I would add that the team that worked with me—I think a number of you have met Laura, Andrew and so on, up in Abercrombie House—that team is absolutely dedicated to supporting people who have entrusted us with their experiences and with their stories.



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Where they do come through partners, and when we do end up talking directly to survivors—sometimes that contact is direct so occasionally they bypass a local system and maybe come straight to us—they spend a lot of time, including out of hours, working with survivors who are in different time zones to give them counselling, advice, support, signposting other sources of support to them locally, also in the UK and internationally, and feeding back to them what is going on with their investigation, investing in that one-to-one relationship with survivors.

The report that ICAI produced makes the point very well that there are not that many cases where we are dealing directly with beneficiaries. That is certainly the case in the sample that they looked at, which goes right back to 2018 or so. That is a problem in the sector. There are not enough people who are yet feeling that they can come forward. We know that under-reporting is a problem and it is something that we are actively working on from an investigations perspective. In other words, me talking to my counterparts that maybe work in the UN or work within large INGOs, and then there are all the different initiatives that Peter's team on the policy side are dealing with. We recognise that it is a problem.

On the numbers of survivors, we are beginning to see them come through from the beneficiary side now. Over the last six months 48% of our cases—that is 26 cases—are now beneficiaries, which I think hopefully is demonstrating that over time we are beginning to build up a little bit of trust because that was not the situation, and ICAI highlighted that back in 2018, 2019.

I wanted to throw that in there from an investigations perspective. The team that is trained in dealing with survivors spend a lot of personal time also talking to them whenever we are aware of them, whenever they come to us direct.

Vicky Ford: Maybe I could give you an example. Take the situation in Ethiopia, especially in Tigray in northern Ethiopia. It has been horrific and we know it has been horrific. Access even to humanitarian aid has been very limited. A lot of my focus for the earlier parts of this year, the end of last year, has been trying to get more humanitarian aid, full stop, flowing—food, water, medicines and so on. There is still not enough flowing.

We have partnered with UNICEF, we have partnered with the UN Refugee Agency, we have had the International Committee of the Red Cross out there providing lifesaving support to survivors, including the survivors of sexual violence, and they have equipped specialised centres, but I cannot guarantee by any means that everyone who is a survivor has been able to get that support because it has been such a difficult operating situation.

We will continue to work. Analysis of the situation there is improving but it is challenging.



- Q42 Mrs Pauline Latham:** It is because if you have somebody sitting in Abercrombie House, outside Glasgow, talking to a recipient of aid who has been abused, you have, first, the language barrier, secondly, they need a phone, and thirdly, they need to know how to get hold of somebody in Abercrombie House. I find it quite hard to believe that people are ringing straight through to Abercrombie House, or that Abercrombie House is ringing straight through to survivors. In the past it has been shown that there might be notices up, "Please report if you have been sexually abused" but they are often in English, not in the local language. There are not the translators there to help or they do not trust the translators or maybe they are the abusers. It is a much more complicated system than you make it out to be. It is incredibly complicated. The language and cultural barriers are huge.

I am not doubting the sincerity of those in Abercrombie House. I just have great difficulty understanding how they can be spending hours of their time talking to survivors of that situation in Ethiopia, in Tigray, in Cox's Bazar, wherever; I find that very hard to believe.

Vicky Ford: But that is why we also support organisations on the ground. Go back to the situation in Ethiopia. We have invested £500,000 in seconding technical experts into agencies in Ethiopia. We have worked with UNICEF to partner with other international NGOs. Even though, in this incredibly difficult, challenging situation, where there have been times when even food has not flowed, we have been endeavouring to get that support at a local level too. You are absolutely right; you need the support at the local level too. I just wanted to say that it is incredibly challenging.

- Q43 Mrs Pauline Latham:** ICAI said that FCDO has not yet conducted the listening exercise that was planned three years on from the 2018 summit. When will you conduct this exercise?

Vicky Ford: When we had the 2018 summit the suggestion was to do that follow-up listening exercise. Then obviously Covid happened, and it had to be delayed as a result. Then survivor groups and their representatives said in 2021 that they did not think that at that time—it was then three years on from 2018—that a one-off listening exercise was the best way to help survivors. This was them from the bottom up saying, "Do not do that". Instead, they want us to continue consulting with different networks of survivors and continue with the research initiatives to look at how we can best collaborate on systemic learning. That was their recommendation.

Peter Taylor: It is an ongoing active process. Every single case is a mini listening exercise. Also we have representatives, survivors and victims, on all our main programme boards overseeing the programme initiatives that we are delivering. Then as the Minister said, the soundings that we took were rather than doing a one-off ad hoc thing just make sure that you are doing it on a continuous rolling basis, which we think we are.



Q44 Mrs Pauline Latham: How does talking to groups of people, groups of survivors, differ from talking to one-offs on the listening exercise? Individuals who are survivors in this listening exercise—how does that differ from the groups that the Minister talked about, meeting with lots of groups of people?

Peter Taylor: We are trying to learn from each individual case. We listen very carefully to every individual survivor and victim who we come into contact with, whether it is through the safeguarding investigations team or through our staff on the ground who are engaging with people.

You saw an example in the ICAI report about Bangladesh, for example, and people going out to camps and hearing first-hand about some of the things that are going on.

Then there is the engagement that we are having with representatives of groups. They represent individual survivors and victims. Not every survivor and victim will want to talk to us. We know that. But there are people who have those networks, particularly the women's rights organisations you talked about. We are doing some interesting work with women's rights organisations in Malawi, for example, to hear from them, and to hear about how we can better provide support services to survivors and victims.

We are coming at it in multiple ways, talking to individuals and talking to networks and groups, and that is constantly feeding into our thinking.

Mrs Pauline Latham: There will never be an end product, but you say this is what we will do as a result of listening to what people have to say.

Peter Taylor: There could be. We did an exercise in 2018, as you know, and as ICAI picked up on, and we published that. We have done more recent research, which we have also published, about what are the listening networks available and people we can talk to, and how can people feed their views in.

We might do something else, but at the moment we feel that spending time and effort on a one-off standalone listening exercise is not the most effective way to go. We have a programme to support survivors and victims that we launched in March last year with various components. When we get towards the end of that we will take stock of where we are and see what we need to do.

Q45 Chris Law: I am listening quite intently to what you are saying, Peter. It kind of falls under the question I have. We heard from ICAI today that they had heard from people that they were reluctant to report cases of sexual exploitation and abuse because they thought they would not be believed, or that the system is corrupt. These are the kind of things we heard a few years ago when we started this inquiry. Has anything changed in these last four years and if not, why not?



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Peter Taylor: I think they have. Some of the facts and figures that we were talking about show we are seeing a much higher number of cases being reported. I do think that that shows increased trust in the system.

Q46 **Chris Law:** Can I stop you there? When you talk about numbers being higher—you have given evidence earlier—overall what percentage is that based on the number of people who work in the humanitarian sector?

Peter Taylor: I heard the figure mentioned in the earlier session of about 500,000 people working. We are talking about how many people are reporting cases. How many people are beneficiaries of aid, I do not know, but it is probably tens, hundreds of millions given the extent of the crises that the Minister was talking about earlier.

We do not know how prevalent sexual exploitation, abuse, and sexual harassment are by aid workers. Again, this is because of the lack of data. We strongly suspect that there is huge under-reporting. It is the same in the UK for victims of sexual violence. Probably only one in seven victims feel confident enough to report. When you then take this to a situation like South Sudan, with much weaker systems and so on, the chances of people feeling able to report are much lower.

All we can say is that we are seeing an increase. All the organisations we work with are seeing an increase in levels of reporting.

Q47 **Chair:** The increase we are talking about is about 280 a year, something like that, so we are talking a pinprick of a bigger problem.

Peter Taylor: You are talking about the number of reports that we receive and which may be related one way or another to the aid that we are funding. Bear in mind that we are a big donor but not the only one.

I am sure that what we are seeing is only a small amount. I have no doubt about that. I do not have the data to back it up because there are no baselines. But there is a lot of under-reporting. I am sure there are lots of people who still do not feel confident enough to report.

Chris Taylor: It is not just the humanitarian sector either where we are seeing the total caseload increasing. It is across the development sector that we are engaged in, and it is also internally within FCDO, so our own staff feeling more able, we think, and confident to come forward and say, "This is what happened, what are you doing about it?"

Another thing we brought in over the course of the last 12 months as well is a greater commitment to transparency in publishing some of this data in our annual report, which we have not done previously. But we think that is important so people can see that within our organisation there are consequences for not meeting standards, and that there will be consequences for perpetrators but there will be justice for survivors who have come forward and told us about these things.



I completely take the underlying point you are making, which is there is a lot more going on than we can capture through people coming and telling us about their experiences. It takes time to build that confidence. It takes time to change cultures both within FCDO and across the sector; that is what we are trying to engage to do.

Vicky Ford: If you believe you are transparent with data it makes it easier for whistleblowers to come forward, because they know that there is transparency around this. One of the things that we believe has been shown is that not only us publishing the data but also encouraging all those partners to publish the data is key. That is part of what we are doing.

We also have a toolkit for responding to allegations of sexual harassment that looks at some of the barriers that people have in coming forward.

But you are right, there has to be zero tolerance for inaction. If somebody hears of or reports an allegation from FCDO, action needs to be taken and the whistleblowers need to be supported. Encouraging the data to come through is part of that, and making sure that all our partners know that they need to have whistleblowing policies and practices is also key.

Quickly to Pauline's question—you asked about when we will have another key point to bring together survivors and others, and it will be the global conference that we have on PSVI in November. It will be part of listening again to survivors, global action, and so on, on this.

Mrs Pauline Latham: It is not the survivors in Bangladesh.

Vicky Ford: It is always listening to survivors.

Q48 **Chris Law:** What I am hearing is encouraging but it is incremental and incredibly slow. Four years on, I feel like we are barely scratching the surface, albeit we have scratched the surface.

Do you have any systems in place to monitor cultural change in the humanitarian sector on sexual exploitation and abuse? How many people have you had to dismiss from either the FCDO or agencies that you fund as a result of survivors coming forward and found to be correct in what they are saying?

Vicky Ford: 31,000 recruitment decisions have gone through the MDS system; 140 people have been blocked from taking work; the system is being used by 130 organisations and that includes NGOs, private sector organisations and others. I hope that is helpful. It did not exist four years ago. It exists now, and it has stopped at least 140 people from getting into work in places where they should not be.

Peter Taylor: On the cultural point, again it is hard to measure but as an idea, for example, Bond—the UK NGO platform—does an annual safeguarding survey of its members. The results of that from 2020, and



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2021, for example, indicate that 97%, I think, of them said that they had improved their own safeguarding practices over the previous 12 months as a result of the measures taken, and these are measures that we have been working with them on.

Also, interestingly, over 50% in both surveys said that they felt that as a result of those changes, affected populations and also survivors and victims—people who are at the sharp end of this—are safer as a result.

That evidence is there in the cross-sector safeguarding reports that we publish every year from those who made commitments at the October 2018 London summit. We provided that evidence. It is not there in the ICAI evidence review, so again there are things there that have not been taken into account or could have been taken into account that give a sense of progress.

There are some good quotes in the ICAI report as well from beneficiaries in Uganda, and from employees of organisations in DRC, for example, saying that as a result of the changes over the last few years things are definitely different.

Chair: Let me pause you on that point.

Mr Ian Liddell-Grainger: I think they have answered both questions that I was going to ask, so we can move on.

Q49 **Mr Richard Bacon:** I have one supplementary to your point about 31,000 recruitment decisions and 140 blocked. Mr Law had asked how many have been fired from the FCDO or beneficiary organisations?

Peter Taylor: From beneficiary organisations, I do not think we have that data but sometimes that data is collected and published. The documents that I have seen suggest that on average at least 100 people a year are dismissed as a result of sexual misconduct. Within the FCDO, again we publish numbers in our annual report.

Chris Taylor: We publish bands rather than specific numbers. We are slightly nervous about publishing a specific number in case people start to try to do the maths and figure out who it was who has left, who maybe left quickly, and therefore maybe that is why a dismissal happened. What we do not want to do in any of these cases that we are involved in is either reveal survivors, or potentially reveal subjects of complaint if we have taken disciplinary action right up to dismissal. The numbers of dismissals from FCDO are not enormous. We are talking about a handful every year.

Mr Richard Bacon: Less than 50?

Chris Taylor: It is a handful every year.

Peter Taylor: I can give you the figure from the last annual report that we published. In July we said there were 22 concluded cases where the



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subject of a complaint or the survivor is an FCDO staff member. In eight of the 22, the allegations were upheld resulting in disciplinary action up to and including dismissal.

- Q50 **Mr Richard Bacon:** When I asked the head of HMRC once how many of his employees were facing criminal prosecution, through gritted teeth he replied 13. Do you have any people who are employed by the FCDO facing criminal prosecution for any of this?

Chris Taylor: I think I might come back to you in writing, if that is okay, privately to the Committee.

- Q51 **Chair:** From the evidence we have received it seems that a lot of the abuse happens with locally-employed people or within the big UN organisations employing local people. Could you speak a little about any work that you are doing around prosecutions or enforcing disciplinary in countries rather than with UK-based staff?

Peter Taylor: Let me give an example of Project Soteria, which is the project that we are funding with Interpol and ACRO. It is looking at the criminal side of misconduct. The misconduct disclosure scheme that the Minister mentioned, the 31,000 checks, and the 140 not-hires, deals with non-criminal behaviour.

Chair: Is that non-criminal behaviour of people directly employed by the UK?

Peter Taylor: No, by aid agencies worldwide. When you get into the criminal space, we are working with Interpol. It is doing work with law enforcement agencies in countries in Asia and Africa and linked to the Ukraine crisis as well. It is doing capability building, capacity building of law enforcement, and working with NGOs and aid providers there to work out how to make it safer to build up the confidence of individuals to report cases to law enforcement, so that law enforcement in those countries can take relevant action.

Vicky Ford: That Interpol Soteria programme is a programme that we fund. The answer is that we would not necessarily take the criminal prosecution ourselves because we would be funding others to build up the capacity to do so.

- Q52 **Chair:** But you are confident that those prosecutions, and also those internal disciplinaries, are happening in other countries where you are recognising there is abuse?

Vicky Ford: If we felt that the capacity in every country to deal with this was there already to deal, we would not be funding Interpol to run the Soteria project.

Take Moldova for example. Moldova has asked for extra support now, because of what has been happening, to build up their capacity in law



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enforcement to be able to understand how to encourage people to report and then take those cases. We are funding that through Interpol.

- Q53 Chris Law:** Sir Mark Lowcock—I do not know if you have managed to read his book yet—“Relief Chief”; it is excellent—on his role as commissioner of humanitarian aid with the UN, but he was also Permanent Secretary to DfID. He described the cuts that were decided by the UK Government as draconian. In that light, ICAI’s review states that there has been no increase in the amount of funding that partners are able to claim from FCDO, which indicates that there is no additional allocation available for sexual exploitation and abuse. Are partners able to request funding for increasing safeguarding and SEA measures?

Vicky Ford: First, no other donor is investing as much as the UK in global, national, international and local safeguarding mechanisms even following the move to 0.5. There are a number of different areas where we support partners. For example, one would be through the Open University training course that we run, which is free. If you want a certificate you have to pay for a certificate but the course is free.

There is a mechanism I mentioned earlier, the communications fund, where NGOs can come to us in order to get support to bring out communications in local languages and advice on what they should say. We also run hubs, both here out of the UK and in a number of other different countries—in Africa it is in Nigeria, Ethiopia and South Sudan—where NGOs can go for advice on their safeguarding mechanisms.

There are lots of different ways that we are putting in opportunities for training, places NGOs can come to get funding for direct materials, as well as providing advice.

Also it is part of our contract with an NGO. If we are funding an NGO as part of a programme, we expect safeguarding to be part of the programme we are funding.

- Q54 Chris Law:** Can I follow that up? What about for NGOs that you have withdrawn funding from that have made significant improvements in safeguarding and have yet not received any funding? Is that something that you would also consider reintroducing back into the family of NGOs and making sure the funding is returned?

Vicky Ford: Are you talking about Oxfam? That would be a specific example.

Chris Law: I was about to come on to Oxfam, yes.

Chris Taylor: Shall I just go on?

- Q55 Chris Law:** Before you do, I had a look at this. You are obviously aware that it has made substantial improvements, but it has been ignored since March, after four years of improving its safeguarding. It is a bit ironic, given that the UK Government normally consistently has been, according



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to ICAI, failing to engage directly with its own victims of SEA, but it has gone further in reducing the ability to respond to allegations by destructively slashing the UK's ODA budget. Would the Minister admit that the UK Government has been hypocritical in withholding funding from Oxfam?

Vicky Ford: No, I would not say that. I would say that some of the situations that appeared at Oxfam over the years were very, very concerning. We are minded to allow Oxfam to come back and bid for UK funding again, but the Foreign Secretary is also very minded to keep that under very, very close watch, with ministerial signoff on each decision.

Having said that, part of what we have agreed with Oxfam is that there would be open discussions between us and it, and that there would be no surprises. Anywhere there was an issue, there would be no surprises. First I want to say that Oxfam obviously has made significant improvements to its own process. We recognise that. However, it has also had this agreement that it would inform us promptly of any new cases. You may have seen the story in *The Press* on Monday. I want to look at how closely Oxfam had informed us in advance of that story.

Q56 **Chris Law:** Is that application being made to all NGOs or are you just singling out Oxfam as the example that the FCDO is going to focus on?

Vicky Ford: We expect all of our partners to have very robust safeguarding processes. Oxfam has been a very important partner. We have been continuing to partner with it in some particular parts of the world where it is absolutely vital. I do think that everybody who is concerned about the safeguarding issue will recognise how serious those concerns are from Oxfam. Oxfam had put in some very important new safeguarding messages and processes, including a pledge to make sure that it was totally transparent with us on all potential allegations.

This Committee would respect, given that there was a story on Monday, that I want to go and double-check that Oxfam has held up to its promise on transparency and sharing of all information. Therefore, as I said, we are minded to let it come back in but with some very strict ministerial oversight. I think that is right, but I want to double-check the situation on Monday and keep that caveated. Its promise of no surprises is a key bit of our potential—

Q57 **Chris Law:** I appreciate that point, Minister. It is valuable that you are making that point. My concern, from what you are saying, is that it is the organisation that you hold up is the exemplar example of what you are looking for and that is not the way you treat all other NGOs. My second point on this is that a decision needs to be made urgently yes or no, because in the horn of Africa—you talked about Ethiopia a little while ago—there are 20 million people at acute risk of starvation. Oxfam is there to be ready to deliver and is in a position to do so, so decisions need to be made. It was in March this year that its report was concluded. At the end of this week we will be in July, so why has it taken so long?



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Monday has only happened two days ago, so I am suggesting that you have had three months.

Vicky Ford: Chris, can I say that I am acutely aware of the situation in the horn of Africa? I met all the members of the Disaster Emergency Committee last Wednesday to discuss that. It is tragic, utterly beyond tragedy.

I have said all that I can say on Oxfam. Part of the work that we want to do with Oxfam is to make sure that we have this complete sharing of information. Today is Tuesday. A story came in *The Press* yesterday and I want to make sure, before I go any further, that that transparency was there.

Chris Law: I do accept that.

Vicky Ford: We are minded, with that one caveat, to make sure that we can continue to use what is often very important expertise from Oxfam, partnering with us. However, we have to make sure that the safeguards are truly working.

Q58 **Chair:** For clarity, that was a shop worker who mentioned being abused by her manager.

Vicky Ford: I understand that.

Q59 **Chair:** Minister, when the Foreign Secretary was in front of us on 18 May she did say that she would look into this case. I have written to her and have not had a reply on it. If you could give her a nudge I would be very grateful.

Vicky Ford: I spoke to her about it yesterday and I spoke to her about the story in the press yesterday. She is minded.

Chair: I am very aware, as the MP for Rotherham, which has made huge changes in its practice, that we still get kicked every time there is a story like this. Sometimes looking at what is actually going on rather than at the media is helpful in these cases.

Q60 **Mr Richard Bacon:** This is probably for both Messrs Taylor. The UK's approach to safeguarding is based on what are called four strategic shifts, which, looking at the report, are ensuring support for survivors, victims and whistleblowers, incentivising cultural change, adopting global standards and strengthening organisational capacity. Who is responsible for monitoring the implementation and the success of that strategy, those four strategic shifts?

Peter Taylor: That is one for this Mr Taylor. We publish a report every year in terms of the progress that we are making. Who monitors it? We publish it and anybody is welcome to look at the report and our assessment of progress and to tell us whether or not they think that is accurate or not. The first progress report was published at the end of last year. We are just starting work on the next progress report, which we



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plan to publish by the end of this year. We would welcome any feedback and any comments on how people think we are doing. It was very interesting to read ICAI's assessments of how we are doing on that.

I should say on those strategic shifts that it is not just the UK but is everyone who made commitments at the October 2018 London summit. It is the United Nations; it is the international financial institutions. There are nine groups, all the major donors, and we report back annually on how we think we are doing, progress and also remaining challenges.

Q61 Mr Richard Bacon: You have a thing called the Safeguarding Delivery Board and there is a thing called the Safeguarding Champions Network, which I presume was not a nod to the Chair. What is the difference between these two roles?

Peter Taylor: The Safeguarding Delivery Board is an internal governance structure. It is chaired by a director, Professor Charlotte Watts, who is a world-leading expert in this area. That is to check on progress internally against the priorities that are set by the FCDO management board in this area every year. It meets quarterly, and has representation from right across the organisation. The membership of that might include some safeguarding champions but the safeguarding champions, of which there are over 100, are individuals in departments within FCDO or a mission overseas. They work closely with the safeguarding unit and the Safeguarding Investigations Team to build internal capability and confidence in—

Vicky Ford: In our own organisation.

Peter Taylor: In our own organisation and also working with external partners.

Q62 Mr Richard Bacon: Is it made clear to all their line managers or ambassadors or whoever it is that these people are safeguarding champions and that they have time to do this work in addition to their other heavy workloads.

Peter Taylor: Yes, absolutely, but to be absolutely clear, we are not saying that they are the single person responsible for work in that area on safeguarding. The clear mantra that comes from the Permanent Undersecretary is that safeguarding is everyone's responsibility. That is why all staff are targeted with communications, training activities and so on. However, those champions can play a catalytic role, a co-ordination role, to help accelerate progress.

Vicky Ford: And also receive extra training.

Q63 Mr Richard Bacon: Mr Chris Taylor, I mentioned earlier that I was on the Public Accounts Committee for many years. If one read the words "case management system" it usually made the blood run cold because of the expense of a Government computer that did not work. Can you tell us about your case management system? What is its scope and how does it



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work?

Chris Taylor: It is a bespoke piece of software—

Mr Richard Bacon: God help us.

Chris Taylor: —that we bought a few years ago. It does slightly make the blood run cold. It is very good in some respects. It was initially built around fraud cases and when we took responsibility for building a safeguarding investigations capability across what was DfID and now FCDO, we expanded its functionality so that it could be partitioned off and used just by the Safeguarding Investigations Team and only accessible to them. It is standalone, secure information, so that no survivors or subjects of concern are available to anybody else.

It is open to be manually improved and updated. This is one of the points that the ICAI team picked up—at the point where they asked us for case data, we did not have an automatic flag that said that we can filter automatically and say, “Here are all the beneficiary related cases”.

Chair: We were very surprised to hear that.

Chris Taylor: We had filters for all kinds of other scenarios, such as partners, locations, and the type of survivor, but not specifically beneficiary survivors. They gave us a sample and we went through it and identified all of those that were beneficiaries, because we had the information in the system but not attached to a specific filter, which we have now changed. We have added a filter. That is the functionality of the system. It does allow us to manipulate how it works, add different filters—

Q64 **Chair:** Were you surprised by what you found once you did that?

Chris Taylor: We have already covered this, in a sense. The surprise is that the number of beneficiary cases is very low. However, we knew it was low already because the safeguarding team are the recipients of all that information that comes in, and they were cutting it in different ways, for example by geography or by sector, and giving that information to directors. I meet DGs, director generals, typically once a month or so, and I am giving them information about what we are picking up as well. It was not a surprise that the caseload was that low in terms of beneficiaries specifically, but it is a standing problem that we have explored quite a bit in this Committee. We now have that filter, which is why earlier on when I said that about 48% of cases over the last six months relate to beneficiaries, we can get that information much more quickly now because we have added that filter.

Chair: It was much higher than I thought.

Chris Taylor: Yes, it has clearly gone up.

Q65 **Mr Richard Bacon:** Is that because you have better information or



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because it has actually gone up?

Chris Taylor: No, it is because it has gone up. Previously, we had information about whether a beneficiary was involved in a case in the system, but not attached to a filter. It was in the text of the case, so the only way to get that information at that point in time when ICAI asked for it and said, "Can you go through these 300 or so cases", was for one of the team to literally go through it and fish out all those cases that were beneficiaries to give to ICAI. That was clearly a slow, bureaucratic way of doing it. Now we can do it much more quickly and we can track that as a piece of management information. That was a helpful insight that they gave us and we are now actively doing it. We do not just track by beneficiary; we track by a number of different ways through the system, for example geography, sector and whatnot, to produce management information.

Vicky Ford: It is also important—especially to protect whistleblowers, Chris's earlier point—that being able to access that data is only for independent case investigators. You cannot get somebody else who is not part of that. The cases are all managed confidentially by their case manager. They are prioritised one, two and three in terms of higher risk to lower risk. It is important to have those extra protections.

Chair: Minister, we have met your team twice now and each time we have been very, very impressed by what they are doing.

Vicky Ford: It is very difficult work.

Chair: Yes, it is.

Q66 **Mr Richard Bacon:** Although it started as a fraud system, you have now essentially hived it off and it is a standalone database just for this. Is that what you are saying?

Chris Taylor: It was a standalone system when it was a fraud system as well, but what I mean is that initially it was set up to capture fraud-specific information—the value of the allegation or the value of the potential loss, or how far through a fraud case we were in terms of reclaiming or clawing back that money. We had to add a whole load of extra filters and fields to the system to allow it to catch safeguarding data. One of the fields that we did not add—bearing in mind that we are building this as we go—is that field around beneficiary data to specifically pull that out.

Q67 **Mr Richard Bacon:** You are the head of internal audit; that is your job.

Chris Taylor: I am, yes.

Q68 **Mr Richard Bacon:** You have another parallel system that is now doing the fraud system, do you?

Chris Taylor: No, sorry. It is the same system but the system allows us to partition access. Within that same system only safeguarding team



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members can get the safeguarding cases and the fraud people get the fraud cases.

Q69 **Chair:** Minister, DfID, now FCDO, has developed some fantastic schemes focused around perpetrators, but obviously once you have a perpetrator you have at least one victim. Can you tell us how you are embedding prevention across the work of FCDO?

Vicky Ford: Embedding intervention support?

Chair: Prevention of abuse, and exploitation.

Vicky Ford: It goes back to what we expect all of our partners to have, which is to have a prevention strategy, to be focused on SEAH and to have in place proper policies. One of the best ways, sadly, to prevent it is to make sure that you have a way to hold abusers to account; I see it as a chain. I mentioned sexual violence and conflicts are the same. It is the same sort of thing. You have to be able to try to hold people to account in order to go upstream to have the prevention. Embedding prevention, making sure your NGOs have proper policies, making sure that they have proper reporting policies, recognising that sometimes that will be difficult, encouraging them all to go and use the misconduct disclosure scheme—we have been through this many times. We cannot use the UK DBS scheme because we cannot force other countries to do that, but making sure that we are building up that database through the MDS and using it, making sure that they have access to materials in local content, which is why the communication part is all part of the network. In order to do the prevention, you also have to have the, “We’re going to catch you”. Both sides are part of this.

Q70 **Chair:** How do you make sure that of the organisations that you fund, it is not just a paper exercise, that they do not just present to you the file that they have created on engaging with community leaders?

Mr Richard Bacon: Or their policies.

Chair: Exactly. How do you audit that that happens on the ground?

Vicky Ford: That is part of having the assurance process and the independent assurance process as well.

Peter Taylor: There are different ways of doing that. This is why having the very active monitoring of programmes in the field is so important as well. People might say, “Yes, we have a great policy”, but until our staff go out or we pay for third-party monitors to go and test that and to talk to effective populations, to beneficiaries and ask if they are aware of this and is this working in practice, that is how we test it.

We also provide quite a bit of funding to what is called the CHS Alliance—the Core Humanitarian Standard Alliance. That is one of the two core standards that underpins all the work, all international work on safeguarding. It has a verification process through the Humanitarian



Quality Assurance Initiative, which we also fund. It will go out and test in the field, go and talk to beneficiaries, and recipients, visit countries, and see whether or not the organisations are implementing those standards on sexual exploitation, abuse and sexual harassment and the prevention of that in their programmes and their projects. That is another way in which we do it.

Any reports that we get through the Safeguarding Investigations Team of concerns about an organisation we can follow up with. We do central assurance assessments and regular due diligence of partners as well. There is a whole series of mechanisms that gives us an ongoing, iterative narrative about how well a partner is doing.

Q71 Chair: I am sure you are aware that in our most recent report on safeguarding we did draw some concerns around those schemes. For me, speaking to the people, the beneficiaries on the ground, and empowering them, seems to be the most effective way of both prevention but also an early warning system of things going wrong.

Vicky Ford: Back to whether we agree or disagree with ICAI, we do agree that more research needs to be done, and indeed with Charlotte Watts this afternoon, on thinking about how we can run some more projects through What Works and Work Works to prevent violence in refugee camps. Are there solutions, more safe zones, different places for different people to be able to stay? What does work? We need more analysis so that we can build that up and we will continue to do that.

The other thing that I personally believe is important is that we try to lead by example through the FCDO network. For example, I have done the safeguarding training that we expect all members of staff to do. If you have been thinking about safeguarding it is not complicated, but if you have never thought about safeguarding, maybe it is. If you fail to answer even just two of the questions right, you have to go back to the beginning and go through the training. It is important that every single member of staff does that. I cannot tell you that every single person who is in the FCDO network has never been accused of misconduct in this area, but I can tell you that these guys and the team are absolutely on it when we get an allegation. We absolutely protect whistleblowers; we treat them all incredibly seriously and we want to make sure that we lead by example and will act appropriately if we find issues.

Chair: That is an appropriate point to stop. You have been generous with your time. We do appreciate that this has your personal focus, Minister, and the team led by Peter has done some amazing work that we have been witness to. Thank you, Chris, for all that you are doing as well. It is appreciated.