

International Development Committee

Oral evidence: Sexual exploitation and abuse in the aid sector: follow-up, HC 1973

Tuesday 2 July 2019

Ordered by the House of Commons to be published on 2 July 2019.

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Members present: Stephen Twigg (Chair); Richard Burden; Mr Nigel Evans; Mrs Pauline Latham; Mark Menzies; Lloyd Russell-Moyle; Paul Scully; Mr Virendra Sharma; Henry Smith.

Questions 70-126

Witnesses

I: Kathryn Hancock, Principal Consultant, IMC Worldwide, Sinead Magill, Managing Partner, Palladium Group, Fergus Drake, Chief Executive, Crown Agents, and Jo Elms, Managing Director, Options Consultancy Services.

Examination of witnesses

Witnesses: Kathryn Hancock, Sinead Magill, Fergus Drake and Jo Elms.

Chair: Good morning. I welcome our panel of witnesses from the private sector partners that work with the Department for International Development. This is a follow-up to an earlier session; we felt we wanted to get a fuller picture of what is happening in the private sector, following the safeguarding summit last October. We are seeking to cover eight areas over the next hour and I ask Pauline Latham to lead off.

Q70 **Mrs Latham:** Good morning. What would you say is the biggest change your organisation has made to its approach to or investment in safeguarding since February 2018? We can start from one end and go along the panel.

Chair: Please do introduce yourselves as you answer.

Jo Elms: Good morning. I am Jo Elms, the managing director of Options. To put my answer in context, Options is an international development consultancy that tries to bring innovative solutions to some of the most complex areas in the health sector in the countries where we work.

In terms of changes, I would be happy to talk about the policies and procedures that we have introduced, but I would emphasise what we are prioritising at the moment, which is reporting and trying to bring about reporting systems in which vulnerable people feel comfortable to raise issues, because ensuring there is a safe space is crucial for safeguarding.

For that to come about, we have tried to bring a positive culture to the organisation in three ways. The first way is through recognition that we are a company that works on safeguarding quite a lot and has done for some time. Some of the programmes we implement are addressing some very sensitive issues.

Secondly, it is through safeguarding being taken very seriously and being seen to be taken very seriously at every level, from board through to senior leadership, to the programme staff that are analysing reports, and to those team members who are implementing programmes.

Thirdly, it is through the programmes themselves, which work directly with vulnerable adults and children, and ensuring that at events that take place, such as training workshops, safeguarding is raised at the beginning, in order to encourage people to speak up if they have issues that they want to raise.

Fergus Drake: I am Fergus Drake, chief executive of Crown Agents. Crown Agents is a not-for-profit international development company, established back in 1833. It is passionate about transforming the future for millions of people overseas.

This has given us an opportunity to have a root-and-branch review of all our systems and structures. Building on what Jo has said, that has got to come into five areas: leadership, policies and procedures, training, reporting and a speak-up culture.

I will focus on the first one, which is how we as an organisation lead in this area. We have a non-executive director, who all safeguarding focal points go to, and we have an executive team, where this is spoken about on a weekly basis, on a risk register. The key thing is that when senior members of staff go on the ground, speaking to our teams, they put safeguarding in the same bucket as security and financial compliance.

As chief executive, I constantly focus on the security of our staff and financial compliance, for obvious reasons, but having safeguarding as something we speak about directly—by asking who the safeguarding focal point is, what the processes are by which that person would get to know about safeguarding concerns and if the concern is in that person what the escalation route over that is—means that at each point there is an understanding that the culture of the organisation is to put safeguarding at the focal point of what we do.

Kathryn Hancock: Good morning. I am Kathryn Hancock from IMC Worldwide. I am IMC's business improvement leader and I work on safeguarding. IMC is a professional services company working in international development. In the context of safeguarding, it is worth pointing out that we do not work directly with children and we don't deliver humanitarian assistance. However, we recognise that safeguarding challenges are inherent in all our projects and we are not just talking about within office hours.

In terms of our activities, last year we appointed a four-person safeguarding team, including a board director. They have established our approach to safeguarding, around the three pillars of prevention, reporting and response. This has been hugely helpful in informing all our activities in our head office and in our projects.

Under prevention, we are talking about strengthened recruitment processes, referencing, interview questions and due diligence, and also being explicit in our communications about what prohibited behaviour looks like.

Under reporting, we are mapping out who we are coming into contact with on our programmes and thinking ahead about who might want to report, what is the most appropriate mechanism for those people to report and providing multiple options for them to do so. It is also about providing guidance to our people on who might be at the receiving end of a report, and how to handle that situation and act in the best interests of the person making the report. Response is about planning ahead—what our response might look like, who gets told and what their responsibilities are, and looking at what support might be available for those people making a report.

IMC was also on the safeguarding steering group in the lead up to the summit, and we still sit on the cross-sector safeguarding steering group after the summit. I am also one of the volunteers that co-ordinates the Safeguarding Leads Network.

Sinead Magill: I am Sinead Magill, I am a managing partner at Palladium, where I lead on our DFID relationship, and I am responsible for safeguarding in my region. Palladium implements a lot of programmes for DFID, from humanitarian response through to health, governance reform and environment.

In the past year, we have focused our efforts on four areas. The first is on ensuring that each and every one of our staff understands what the standards of behaviour are. That includes a review of our policies, which I committed to do for you last year. It includes an enhancement of our training, and frequent and regular communications around what the standards of behaviour are. We have done a safeguarding risk assessment on each and every one of our programmes to determine where we are at risk and what mitigation measures can be put in place. We have also looked at the design of programmes to ensure that safeguarding risks are minimised.

We have enhanced our HR recruitment policies. Very similar to what Kat said, we have looked at DBS for all our UK-based staff. Our humanitarian staff all go through UK Government security clearance, and we have done a review of police checking across the countries where we work to determine where and how those records are reliable and, if they are not reliable, how we verify somebody's identity and their behaviour prior to joining us as a business. Finally, on reporting, we have kept up our record of transparent reporting to all our donor clients on any safeguarding allegation and any incidents that come about.

Q71 **Mrs Latham:** Thanks. I do not know if any of you wants to add to what you have said: if there is a beneficiary with a complaint, can they see any difference in procedures? If there are any weaknesses, how do you plan to deal with the weaknesses in reporting and dealing with complaints by beneficiaries?

Chair: Perhaps as a result of the changes you talked about.

Sinead Magill: I am happy to take that one. I think I speak for everybody when I say that we have not had beneficiary complaints as yet across each of the organisations represented. All the safeguarding incidents that have been reported relate to issues with staff. Our policies include the whistleblower hotline, going direct to safeguarding focal points, and we advertise the DFID safeguarding whistleblower line as well. That is how people can come to us.

Q72 **Mrs Latham:** So beneficiaries have not come forward?

Sinead Magill: Not to date.

Q73 **Mrs Latham:** You haven't had anybody complain as a beneficiary. That



HOUSE OF COMMONS

seems quite strange, to be honest, considering there has been so much publicity. Perhaps the organisations are not letting the beneficiaries know clearly enough what the procedures should be for them if they have a problem.

Jo Elms: Just to come in on what we have experienced, going back a couple of years as well as recently, beneficiaries report safeguarding issues that are going on in their communities and families—abuses that have taken place. They are reporting them as a result of training activities that have taken place. There have not been any reports of safeguarding abuses as a result of the programme implementation. They have seen that the programme has successfully encouraged a culture in which people can report those incidents in their lives, and those have been referred to the appropriate channels in each case.

Q74 **Mrs Latham:** Why do you think that they only tell their families, and do not come to the organisation that is doing the abuse? Are they still frightened and still feel that it is sex for whatever, and that is just the way it is, so they do not feel comfortable enough to complain to the organisations who are the perpetrators?

Jo Elms: The only reports we have had have been ones of incidents in the families and in the communities.

Mrs Latham: To me, that looks as if there is a complete failure. You have not actually changed anything, because people still do not feel comfortable enough to come forward, if they are only reporting it to their families and friends and not to the organisation where people are the perpetrators.

Q75 **Chair:** I think Jo's saying the opposite of that—that it is about their families.

Jo Elms: Yes.

Mrs Latham: It is about the families?

Jo Elms: Yes. Sorry if I wasn't clear.

Mrs Latham: I thought you were saying that they were complaining to the families because the perpetrators were within your organisations and therefore—*[Interruption.]* It is the opposite? Oh, right. I beg your pardon.

Q76 **Chair:** Jo, do you want to elucidate?

Jo Elms: Just to give you a bit more detail on the kind of situation, we have had a programme running in many countries, trying to eliminate the practice of female genital mutilation, and in many communities there have been training workshops and events that, as part of their approach to bringing about cultural change in those communities to try to end the practice, have encouraged a "speak up" culture. What has happened is that people have spoken up about what has been going on in their communities and reported it to the staff working on the programmes.

Q77 **Mrs Latham:** Oh, right, sorry. That wasn't clear. I thought it was the other way around that you were talking about. But if they are doing that,



HOUSE OF COMMONS

people have been reporting things?

Jo Elms: Yes.

Q78 **Mrs Latham:** Because you said that no reports had come forward, but they have.

Jo Elms: The distinction that I was trying to make was that the reports are not of any safeguarding abuses carried out through the delivery of the programmes.

Q79 **Mrs Latham:** Right. Sorry, I didn't follow that. What signals have you received from DFID about the resourcing of improvements to reporting mechanisms out in the field, and more support for victims and better investigative processes? Clearly, there has to be some money put behind this; you have all talked about the numbers of people involved in it, so it is costing you more to do it. What has DFID said about that?

Chair: Kathryn, do you want to try that one?

Kathryn Hancock: Yes. Leading back from your previous question, IMC currently has a live case that is to do with a beneficiary on one of our projects. As that is still live and we are working with the safeguarding investigations team on it, I would not like to share any more details right now. We are really happy with how our local safeguarding focal point on that project reported that case up through the IMC structure, and we were able to share it with DFID. It is early days in that investigation to see how we are working with DFID on the details of that.

Q80 **Mrs Latham:** Does anybody have a view on the extra cost to this? Has DFID said anything about that?

Jo Elms: DFID has allowed budget lines to be built into budgets in tenders. That is the main area.

Sinead Magill: There is some additional overhead cost that is not chargeable to DFID, and then, as Jo said, where there is a safeguarding risk and specific activity is needed on a programme, we have been able to build that into budgets.

Q81 **Chair:** Thank you, Pauline. You have all described the kind of work that is going on in your organisations to improve both the structural side—the reporting mechanisms, the policies—and the culture. Have any of you considered some sort of external review or assessment of your systems, or is it all very much something you are doing internally? One of the things that has come out very clearly through this work is about trust in the entire sector and in individual components of the sector, so some sort of external mechanism is an important element of trying to build trust. Jo, you nodded vigorously when I asked the question, so please do answer.

Jo Elms: I was nodding in agreement that it is a good idea. We have done a Keeping Children Safe audit report, which gave a satisfactory response, but we will do it again, hopefully to see improvements in any areas that it indicated could be improved further.

Chair: Say a bit more about that—Keeping Children Safe.

Jo Elms: It is an external online audit function that organisations can complete. There are also diagnostic tools that are available through some parts of the sector.

Kathryn Hancock: IMC has not to date had an external assessment, but I think it would be a really good topic for discussion at the Safeguarding Leads Network, to find out what colleagues' experiences of those external assessment bodies look like and in their opinion what the best ones out there are.

Q82 **Chair:** I would be really grateful if that was something you could take away and explore in the network, and then come back to us in writing.

Can I ask about the supply chain? Clearly, when we are looking at working in-country, you are typically working with a number of partners in the supply chain. Is it difficult to ensure that some of these issues can be properly addressed down the supply chain, and what are you doing to try to ensure as best you can that they are?

Sinead Magill: Yes, it is difficult. Our supply chain includes 700 organisations and they range from significant organisations like Options through to small-scale local NGOs—women's groups, for example. What we have set out in our contracts and our grant agreements is the responsibility that they have for safeguarding. We have put together a supplier handbook, which is an open-source document. It includes guidance and materials on how organisations can reach the compliance standards we have, and we have shared with them our safeguarding policies and materials, as a demonstration of best practice that they can choose to adopt within their programmes. They can use all of our reporting mechanisms as well.

Fergus Drake: Building on what Sinead has said, there is a role for us in terms of reporting and training, but also often we are in an umbrella role where we are fund managers. Crown Agents runs the health pool fund—a £400 million programme in South Sudan—and we have 12 implementing partners under us there. That, again, can range from very large organisations like World Vision to smaller NGOs. I think there is a cross-fertilisation role that we are seeking to play, where we can get all those suppliers in the same room. We can share best practice. We can use anonymised case studies to ensure that the tide is rising all boats and that they are aware of our expectations, and we are then helping to build their capability going forward.

Q83 **Chair:** I am just sitting here reflecting on Pauline's exchange with Jo, because it raises a very important point about safeguarding. I think for obvious reasons we have focused on cases where it relates either to beneficiaries or staff, where the perpetrator is in the organisation, but what Jo's answer revealed—and I suppose it is not that surprising—is that you are going, just through your general work, to pick up all sorts of other safeguarding issues that do not relate to people who work either directly or indirectly for your organisations. I was thinking then of the



HOUSE OF COMMONS

parallel with schools in this country. Often a school's role in safeguarding is about finding out from children about things that might be happening at home or in the wider community. You talked about it in your answer, Jo. Is that something more broadly that is being reflected on—that as people working on the ground you are going to pick up a lot of information, and then you have a duty, really, to do something with that information?

Kathryn Hancock: Absolutely. It is part of our safeguarding framework about the reporting and response—actually planning ahead for what we might hear about on the ground that is not directly related to our programme or any of our people, and what other organisations are working in that context that we might be able to refer a case on to, and actually having conversations ahead of time with DFID about “Should this happen? What would you like us to do? These are our ideas.” It is certainly something that is very relevant on evaluation programmes, where you are evaluating an implementing partner, especially when these programmes might be humanitarian assistance. Having an up-front conversation with DFID and the implementing partner is really important.

Q84 **Chair:** One of the issues that has, obviously, featured in this debate is the power imbalances within aid organisations and, in some organisations, a lack of gender diversity. Can each of you just tell us briefly about gender diversity at board level and senior management level in your organisations? If the answer is that it is still predominantly male, what, if anything, is being done about it?

Sinead Magill: Three years ago we appointed a chief diversity officer, who is looking at the culture within our organisation to make sure that diversity is reflected in gender, disability, sexuality—the lot. We have put a huge amount of resource in, round culture change and diversity. We are very proud of our record on gender diversity in particular. Our gender pay gap is just 2% in the UK. It sort of waxes and wanes from being in favour of women to being in favour of men, but it is always around 2%, and globally it is 2.5%. Our business at the junior levels to the mid level is very reflective of the communities we work in. At the more senior level, it is going to take a little bit more time.

Q85 **Chair:** Are you able to say the numbers for the board?

Sinead Magill: We have two females out of seven on the board.

Kathryn Hancock: For IMC Worldwide we have seven board members, and that is six to one male to female. We are 50:50 split across the rest of the company in terms of male to female. Just to give you a sense of scale for IMC, we are 150 employees. Certainly in head office, it feels quite balanced in terms of gender.

Q86 **Chair:** Do you know your gender pay gap? I thought that was an impressive thing to be told.

Kathryn Hancock: I'm afraid I don't, no.

Fergus Drake: I'm afraid I don't know our gender pay gap, but I can write to you on that.

Q87 **Chair:** You'll be telling Sinead off afterwards for setting that hare running.

Fergus Drake: Our board chair is a woman, and we have four other, male board members. Our executive team is a 50:50 split, of which we are very proud. In our 14 international offices around the world, we would certainly have more females—and more senior females, as it happens. That is a really strong showing, particularly if you are in environments where that is an unusual thing. It is good to be walking into co-ordination meetings and having conversations with Ministers of Health, where your most senior person is a woman on the ground.

Q88 **Chair:** And is she typically local as well?

Fergus Drake: Sometimes. Actually, in terms of being able to be responsive to the political economy and what is going on in Zimbabwe or Ukraine, then, absolutely, yes, that is really strong. At other times, when we have a more humanitarian focus, those will often be people with rich humanitarian skills who are coming from the UK.

Jo Elms: Our board is 40% female and 60% male. The leadership team is 33% male and 67% female. Across the company as a whole, both national and international, it is 59% female and 41% male. I do not have the data, but the majority of our country directors and team leaders are female.

Q89 **Paul Scully:** How effective are the changes to DFIDs' supplier code of conduct likely to be in guiding and driving changes in safeguarding?

Jo Elms: I think DFID have already shown great leadership in this area. The summit last year was a really excellent event, which turbo-charged the whole safeguarding debate. What is important is that it cuts across the international development sector. This is not just about the private sector, where we are here; it cuts across the NGO sector and the multilateral sector as well.

Many of the compliance requirements that DFID has introduced have been really helpful. Fergus talked about the supply chain, which includes all types of organisations, including academic research institutions, NGOs and community-based organisations. Meeting the compliance requirements on safeguarding, as well as in other areas, is a prerequisite. The kind of checks that we have to do through our due diligence processes to ensure that that happens, before working with an organisation, are doing a lot to protect the vulnerable people that we work with.

Kathryn Hancock: I think the code of conduct and the change to it now explicitly including safeguarding have opened the door to having conversations with partners on this topic. That has been really helpful. IMC's approach is that we need to tackle this together, and not just flow down the contractual requirements to, potentially, partners who are not able to manage these challenges in a proper and meaningful way.



HOUSE OF COMMONS

Recently, we piloted a code of conduct audit of one of our partners. We zoomed in on the KPI in reference to safeguarding. Our programme team is now taking forward the recommendations from that audit with this partner on this particular project. That has worked really well and is happening in a very collaborative way. I hope that the recommendations we have made around safeguarding to this partner are ones that they then embed on other projects that they work on as well.

- Q90 **Paul Scully:** My next question might feed into the issue of the audit. What experiences have you had with being held to account by DFID on other parts of the code? Did that audit, or anything else, throw up anything like that?

Kathryn Hancock: Could you repeat the question?

- Q91 **Paul Scully:** What have your experiences been with being held to account by DFID over other parts of the code? You have talked about safeguarding; I am wondering whether that audit threw up anything when you were looking at that?

Kathryn Hancock: Actually, we just zoomed in on safeguarding for that part of the pilot.

Sinead Magill: We have to do an annual declaration on compliance with the code. That includes sharing all the policy documents and all the reporting across each of the six areas of the code. We have to do that not just at a corporate level, but in each and every project that we sign up to, on a six-monthly basis, as part of the SRM programme—the strategic relationship management programme. We are assessed on every programme and given a performance score. One of those includes compliance with the code, where, again, we have to demonstrate what we have done to lead on the code. We understand that DFID are going to do deep dives into particular areas of the code, including safeguarding.

- Q92 **Paul Scully:** Fergus, do you have anything to add?

Fergus Drake: Purely to say that we really welcome this level of accountability. We have now signed up to all the codes. You have heard me express that this is now running like a spine down Crown Agents, right from the top level of the economic executive director to the executive team. The ability for us to be asked direct questions by DFID and to be able to show how much progress we have made helps us not only in our internal conversations in the organisation, but going down our supply group as well. We very much welcome this.

- Q93 **Paul Scully:** When the PEI spoke to us, they referred to penalties for breaking the code. When was your company last penalised for breaking the code? Have you had any penalties at all for breaking the code?

Sinead Magill: We haven't broken the code, so we haven't been subject to penalties.

- Q94 **Paul Scully:** You talked about safeguarding, Kathryn. What steps have you taken to disseminate around your organisation the fact and the



HOUSE OF COMMONS

implications of the introduction of safeguarding into the code? How have you managed to get that specifically around the organisation? Is there anything you want to say?

Kathryn Hancock: Certainly for IMC, my involvement in the safeguarding summit was a big “We are doing this. This is really important to the company.” I think that helped us take a compliance document and make that into more of a meaningful thing for my colleagues, so they could understand and see that IMC was on this international stage talking about these issues.

The workshops that I run internally, where we talk about cases we have heard about that have been shared by other organisations I have worked with, help to put the compliance document into reality—“This is what it means on the ground.”

We need to be thinking about our safeguarding approach and prevention reporting response at the corporate level, but also on projects. We are working with bid managers to put that in place on bids for jobs that we will hopefully win, but also with project managers for jobs that we are already running, where we are retrospectively applying that and the new code to that programme as well.

Q95 **Paul Scully:** I don’t need four answers, but is there any other best practice that people have used?

Jo Elms: Just to add that we have our own code of conduct, which aligns with the DFID supplier code of conduct. It goes into lots of other areas too. Every staff member and consultant signs up to that. We also run in-house training for all staff on safeguarding and on key issues covered through that code of conduct.

Q96 **Richard Burden:** Could I just return to the reporting of cases to double check that I have got it right? Jo, you were saying that although there have been reports of incidents involving families of beneficiaries, there was nothing involving your staff or contractors. Kathryn, you said there was one case of staff, which is currently being investigated, but no others. Can I just ask Crown Agents and Palladium, have you had any reported cases at all?

Fergus Drake: Yes, over the last year, we have had five incidences. One has been unsubstantiated, and four have been substantiated. They are based around HQ and field-based staff—a range of incidents involving inappropriate language, poor process implementation. We have cascaded all those up to our institutional donors and have followed through our own due processes.

Sinead Magill: We have reported five instances in the last year. Three relate to individuals or organisations working on our programmes who were subject to historical issues. One relates to sex workers, and one to sexual harassment. We have one live case ongoing and two allegations that were proven to be false.

Q97 **Richard Burden:** Were the various different allegations reported to

DFID?

Fergus Drake: Yes.

Sinead Magill: Yes.

Q98 **Richard Burden:** Can you say what the response has been in each case?

Jo Elms: I want to provide question a bit more detail. What I said previously was that no cases of safeguarding were reported through delivery of programmes. We have a safeguarding register that we set up—after the safeguarding summit, in fact—and it has less than five entries on it, of which one was actually a sexual harassment allegation in a supply partner that was upheld, and that person was dismissed. That was reported to DFID through our parent company.

Q99 **Richard Burden:** And was that since February last year?

Jo Elms: Yes, it was.

Q100 **Richard Burden:** How did DFID respond to that? Did it just note it? Did it ask what lessons had been learned?

Jo Elms: Noted it, yes.

Fergus Drake: In the same way, we have reported all our five instances. On the specific one that was related to a Department for International Development-funded project, that was obviously noted. We have had the response that they have been happy with the responses that we have gone through in terms of our internal due processes.

Kathryn Hancock: To loop back to our live casework, we are currently working with the safeguarding investigations team, which has sent follow-up questions to us via email, but that is still live, and I am yet to see how that process will conclude.

Q101 **Richard Burden:** Would you report it to DFID if proved?

Kathryn Hancock: We are in the midst of that investigation, so there has not been a conclusion yet, and we have already reported it to DIFD.

Q102 **Richard Burden:** You have already reported it?

Kathryn Hancock: We have, yes.

Q103 **Richard Burden:** And what did they say? Have they just nodded through your processes?

Kathryn Hancock: Yes, they have presumably reviewed what we sent to them, and they have come back with a few follow-up questions. We are waiting to hear from them.

Sinead Magill: We report allegations. When we report them, we document what we are going to do about them, and then we follow up to describe what we have done and what the outcome has been. DFID follow that and have some follow-up questions. In all cases, we document what

lessons we have taken out of this and make DFID aware of the lessons learned.

Q104 Richard Burden: Has there been an indication from DFID that your experiences—particularly when it sounds like they think you have displayed good practice—will be learned from and used or disseminated elsewhere, or, alternatively, even if they felt your processes were generally all right, were there things that they thought could be done better and that they have given guidance on? Either way, have you had any feedback either way?

Sinead Magill: DFID have been satisfied with what we have done and liked the focus on lesson learning out of every incident, because every incident tells you something new.

Kathryn Hancock: I do not think that we are at the point where we would be getting feedback just yet.

Fergus Drake: No, we have not had any specific role, but there is an interesting role where, constructively, as we talked about earlier, there are often DFID offices in incredibly challenging operational environments. Is there a collation role and an area where we can piggyback on the access and the diplomatic skills that the British embassy or the Department for International Development have, to escalate these issues when you are dealing with police forces that are non-existent, or to challenge, when reporting a safeguarding incident could actually put a victim at more risk? That is an interesting area that it would be good to explore.

Jo Elms: Similarly, in key countries, the DFID counterparts that we and our programme staff engage with have had dialogue about safeguarding issues, given the complexities and challenges there. It is not so much feedback and guidance from DFID as a genuine interest in engaging on how to tackle some difficult challenges.

Q105 Chair: Considering the prominence of the coverage of sexual exploitation, abuse and harassment over the last 18 months, is your broad sense that the number of reports and cases coming forward is now going up? You're nodding.

Sinead Magill: Yes, it has. We reported eight allegations corresponding to five cases in the last 12 months. For the preceding three years, it was eight allegations corresponding to four cases.

Q106 Chair: Okay. Any other feedback on that?

Fergus Drake: In 2017, we had three cases reported. Last year, we had five. As we would expect, we are seeing more cases because of the level of focus that we are now putting on this as an organisation.

Q107 Lloyd Russell-Moyle: Beyond changes to the supplier code of conduct, could you talk to me about how DFID has been leading, facilitating and supporting suppliers and yourselves in raising safeguarding standards? In particular, have you noticed any shift in supportive approach and engagement with the private sector on this issue?



HOUSE OF COMMONS

Sinead Magill: Every programme team that we work with—every responsible officer within the programme—seeks to understand what the safeguarding risks within their programme are, and what we are doing about it. They have been open to conversations about whether we reframe budgets and whether we reframe an approach to minimise safeguarding or to enhance reporting. We have seen a real leaning-in from the private sector, DFID and our partners in the NGO community to addressing safeguarding collectively.

Q108 **Lloyd Russell-Moyle:** Anybody else.

Jo Elms: No, I think Sinead has put it very well.

Q109 **Lloyd Russell-Moyle:** Has DFID provided the resources for you to pool across your organisations to ensure that this additional work does not provide additional financial burdens? Has it produced resources for you to do that? Or has it very much allowed you all to go off to do your own things, but supported you to do your own things?

Sinead Magill: Unlike the NGOs, we don't get unrestricted funding, so we only get resources within the programmes that we bid for. At competitive tender, we put lines in for safeguarding—I think each of us does that—depending on what the programme needs. When the tender is awarded, that line is delivered, but we don't have unrestricted funding.

Q110 **Lloyd Russell-Moyle:** No, what I was trying to get at is: do you put a line in your budget for safeguarding, and DFID says, "Fantastic, thank you very much. If you want anything, we will support you to develop your own safeguarding processes"? Or has DFID provided more generic resources and standards across the sector? Rather than you having to reinvent the wheel in every organisation, is DFID saying, "These are what we expect you to do for minimum standards," but—more than that—with actual practical suggestions? How has that engagement with DFID been?

Kathryn Hancock: I would say—in my experience, and certainly through the conversations in the Safeguarding Leads Network, where I have been able to talk to other organisations—that there very much seems to be a lot of reinventing the wheel going on. A lot of the urgent work post-summit was looking at the commitments that the private sector had made in terms of internal work that we needed to do to get our houses in order. I think that also came through in a lot of challenges that suppliers identified, in that we are writing our own training material. We have probably all written our own from-scratch training material, for example.

Q111 **Lloyd Russell-Moyle:** Is that an efficient use of what is, in effect, public money? I know each situation is different, and of course you have to develop a safeguarding plan for each situation that you are in, but having to start immediately from scratch—tell me if you do think it is useful to do it like that—seems to me inefficient.

Jo Elms: I take a slightly different view. Certainly in the case of the company that I run, we have looked at what is already out there, which is a lot. A lot of dialogue takes place within the sector, and not just between private sector companies but with the NGO sector. We have enrolled on



HOUSE OF COMMONS

some of the courses that Bond has run for the NGOs, which it opens up for others to join—we have to pay, but it seems worthwhile expenditure to me. In our case, because we are a subsidiary of a large international charity, we draw considerably on its expertise as well, and particularly in safeguarding that has been really useful. “Reinventing the wheel”—I wouldn’t put it in quite those terms myself. A lot of sharing of knowledge and best practice has taken place.

Q112 Lloyd Russell-Moyle: To put it another way, would it be unhelpful for you if DFID provided those kinds of blanket resources, because you might then be unable to draw on your parent charity or NGO and on some of the other areas you draw on at the moment?

Jo Elms: It would be helpful, yes.

Q113 Chair: As a follow-up to that, are any of you able to comment on how DFID’s approach compares with that of other donors, perhaps in particular any of you who have experience of working with USAID?

Sinead Magill: DFID is leading the way on safeguarding. Our experience with the Department of Foreign Affairs and Trade in Australia was that they led the way on child protection, and as an organisation we use the work they did on child protection to elevate our work globally on child protection. In the US, I understand that the focus is more on sexual harassment than on the safeguarding of beneficiaries, so we are drawing from each of the three donors in seeking to raise the standard across the organisation as a whole.

Q114 Chair: So in addressing your own policies, culture and practice on sexual harassment you would potentially look to the USAID example.

Sinead Magill: Yes.

Chair: Does anyone else want to comment on that aspect? No. Thank you very much.

Q115 Mr Sharma: Kathryn, you were a member of the working group that set up the private suppliers Safeguarding Leads Network. It held its first meeting on 1 May 2019. Are there any specific outcomes you would like to see the network achieve over the coming years, or year?

Kathryn Hancock: It might be helpful to give you an update on what the Safeguarding Leads Network has done since the start of May. We have facilitated voluntary reporting on progress against the private sector commitments document. We set up a template that asked suppliers to comment on progress made against each commitment, and on the challenges. We led that round of reporting, gathered responses, spent some time anonymising those responses and compiling them into the collective response, and then created a summary document that looked for the key themes that were coming across from various suppliers’ responses. So we have a very long document, which is all the compiled responses, and a summary level. That has been shared with all the suppliers in the Safeguarding Leads Network. The summary level has also been shared with DFID.



HOUSE OF COMMONS

We have grown the very small working group that was co-ordinating the Safeguarding Leads Network; that was IMC and OPM, very much supported by British Expertise International. We have looked to grow that, just to make it a little more sustainable, because this is a voluntary input into that effort. Since then, we have set up a LinkedIn group, which I know sounds like a very small thing but it has really helped with our communication. Over the weeks, the various meetings that have taken place have been generating more and more documents, and previously we were relying on emails to share them around. Now we have one single place where a partner, if they were to join the Safeguarding Leads Network today, would be able to find all the historical information and effectively catch up.

I think there has also been a step change in the conversations that have been happening. Previously, the Safeguarding Leads Network was very much a technical meeting for safeguarding leads talking about technical challenges, but recently we have set up a heads of business or executives group, which is slightly different and is where the decision to run this reporting on progress exercise was made. The heads of business have met four times. The Safeguarding Leads Network meeting, as you rightly pointed out, was on 1 May, and we are meeting again on 10 July. The safeguarding leads technical meeting will happen quarterly and the heads of business meeting will be six-monthly. We are hoping to repeat the reporting on progress exercise every six months, and the heads of business meeting will sync in with that cycle after the analysis has been done.

Q116 Mr Sharma: There will be many areas in which we want the network to achieve but, in your personal view, which one thing would you like to see it achieving?

Kathryn Hancock: In my personal view, just being connected to the counterpart—the equivalent person to myself—in other organisations across 30 organisations, certainly as someone who does not have as much experience as other people in the room, has been hugely helpful. The conversations I have between the technical safeguarding leads is in a safe, non-competitive environment, and I know that I have various people that I can pick up the phone to and discuss with them a challenge that I am facing every day at work. That may be at a granular level, but certainly for me personally that has been hugely helpful.

Q117 Mr Sharma: Jo, you recently became a member of the safeguarding network. Do you foresee that your membership of the network will have an impact on how your own organisation approaches safeguarding?

Jo Elms: I hope so, yes. Already, from our engagement with that network and previous engagement that we have had on safeguarding with other organisations through our day-to-day work, there are some very challenging areas that we all face, such as identifying the right referral pathways when an issue is raised in different cultural contexts. Those are areas where, across a wide range of organisations, there can be some really useful information to share, so that we can try to build our



responses on this. Again, this goes way beyond the private sector; it is actually about how international development organisations can share knowledge with each other.

Q118 Mr Evans: In some of the written submissions that you have given—I am referring to Fergus and Sinead on this one—you stressed that there have been some real problems and obstacles that you have had to confront. I wonder whether you think that the action that has already been taken on things such as the code change, the network and DFID's other efforts have made real differences, or do you think there is still something more that needs to be done?

Fergus Drake: I think, as we said earlier, that this is a journey and we are moving in the right direction in the amount of resources and focus we are putting on it, and the fact that the amount of referrals has increased over the past couple of years. I would build on Jo's earlier point, in that I think we have to ensure that there is not a false demarcation between the charity sector and the for-profit sector. Where we can do a lot more with Bond, and particularly on the focus on international humanitarian passports and Interpol, breaking down some of those silos is critical for us.

We are reaching out, as Jo has said, to see where we can access some of the structures that organisations such as Oxfam and Save the Children have been running with as well. There has been a focus, rightly, on our getting our own houses in order, but going forward it is more about collation and about building from best practice. Even in the past hour, I have heard things from some of my friends across this group about areas where we could do more in that specific area.

Sinead Magill: For me, the big issue is the community complaints mechanisms. There are many avenues; if you put yourself in the position of a woman in country X who is being abused, it is right and proper that there should be many avenues that she can take to raise that complaint. My slight concern is that there is a balance between having many avenues and having too many, which will lead to confusion. That in and of itself is an obstacle to reporting. For me, the next big challenge is looking at how, as an industry—that is, the NGOs, the finance institutions, DFID itself and ourselves—we work in each of our projects to identify community-based complaints mechanisms that individuals can use.

Q119 Mr Evans: Can you give an example of a country where it is perhaps more difficult to confront the challenges that you have had in the past, whether because of the judicial system, policing or the fact that they do not take things seriously? Is there one country that is worse than the others?

Sinead Magill: It is difficult to pull out one, and I would not want to offend my colleagues in any particular country, but there are countries where, if you report an instance of rape, for example, you as the victim may be guilty of committing a crime and in a worse position than the perpetrator of the crime. You could list several countries that that would apply to, but I would not want to name one, if that's all right.



Q120 Henry Smith: My question is principally to Kathryn and Jo. Palladium and Crown Agents have set out some key obstacles to progress on safeguarding. What have you identified, in your organisations, as the main challenges in that respect?

Kathryn Hancock: For IMC, it is our in-house capacity. While we are making great progress, there is still a lot of work to be done in terms of support to all corners of our business in implementing our safeguarding—prevention, reporting and response—framework. We have talked a few times about supply partner capacity as well. A lot of support needs to be undertaken with our partners so that we get this right on the ground. It's slow progress; it is quite an intense effort to get this right.

IMC is at the start of our journey in terms of our internal capacity, especially around investigations. We will be looking to invest in training—probably of me—in terms of investigations. That is an area where we would potentially face challenges.

Jo Elms: Without wanting to repeat what Kathryn said, I share the priority given to the “supply partner with low capacity” challenge. This is something that we try to address in some programmes, where we have resources to do so, with training, but it is one of the challenging areas. I mentioned earlier another one, which was knowing appropriate referral pathways in a particular community environment. A third one I have mentioned is recruitment and vetting—doing all the necessary background checks. It is one thing to do that in the UK, but when you are recruiting in various countries, those background checks are not necessarily easy to get. That is another one.

Q121 Henry Smith: Thanks; you have partially anticipated my next question, in terms of supply chain partners. Can you give an idea of some of the strategies that you are using to ensure that safeguarding is realised throughout the supply chain partners? Jo, do you want to go first?

Jo Elms: The very first thing is the compliance level. Huge resources are being put into carrying out due diligence on what the supply chain partners have in place, in terms of their policies and procedures, so the question that arises is what happens if they don't have the appropriate level of policies and procedures in place. This will vary, of course, according to the type of programme. If it is a programme where there is going to be direct contact with beneficiaries who are vulnerable and if it is a supply chain partner that is essential for the delivery of that programme, we will work with them to try to build that capacity as appropriate.

Kathryn Hancock: Just to add to that, our interactions with partners do not start when we get a signed contract. We have to bid for the work beforehand, so a lot of the bid effort is centred on our framework—prevention, reporting and response—and having meaningful conversations: “On this programme, what does that mean, who is going to do it, and what does that look like?”

Q122 Chair: Thanks very much, Henry.



HOUSE OF COMMONS

Understandably, you have focused very much on partnerships on the ground and partnerships here. May I ask you to talk a bit about international networks? In particular—when we did our inquiry last year, we visited the United Nations—there is clearly a set of issues about United Nations personnel, but also the United Nations role in terms of co-ordinating internationally. My understanding is, for example, that they are looking, through the UN, to develop joint complaints mechanisms, but they also have a number of other networks around PSEA. Is this something that your companies are plugged into at all?

Sinead Magill: When we do a response—for example, one of our humanitarian responses—it is within the terms of reference for the lead for the response to plug into the local networks where they exist. From an organisation-wide perspective and, I think, across the sector, we could do more on that.

Q123 **Chair:** My understanding is that the UN has set in train a number of things as a result of the greater focus on this over the last 18 months. Is that something that the private sector is engaged with more? I mean, that is a good answer in terms of a practical level, but at a policy development level, is that something you are connected to?

Sinead Magill: At policy level, from our perspective, we watch and take advantage of whatever they release and we apply it in our own business, but we are not part formally of any network on that.

Kathryn Hancock: It's the same for IMC.

Q124 **Chair:** Is it the same for everyone? Yes. Are you familiar with the joint complaints mechanisms that the UN is looking to develop in specific countries, precisely to address some of the points that have come up today about how hard it can be on the ground with reporting?

Sinead Magill: Yes, we would really welcome the chance to be part of those.

Q125 **Chair:** My final question is about something that has arisen when we have had more private discussions on these issues. When we want to know what the NGO sector thinks about this, we go to Bond, which in a sense speaks for the NGO sector. There is no comparable body for the private sector. Do you think there would be value in having some sort of industry body that can speak for the private sector on big issues such as safeguarding?

Jo Elms: Yes, I think there would be value. Currently, British Expertise is a convening organisation and has huge potential, particularly since a lot of its membership is about representing British trade interests, and the international development piece of British Expertise is a smaller piece. I think it could be very valuable to expand that. There was another organisation that ceased trading earlier this year. That clearly shows that from private sector organisations such as ourselves, there is a feeling that it is useful to have a body such as that.

Q126 **Chair:** We were at a private meeting with the Secretary of State where



HOUSE OF COMMONS

one colleague talked about the US Society for International Development, which I understand is an umbrella that covers anyone in the US who is involved in international development, be they in the voluntary sector, the private sector, academics and others. Do you think that is a model we could look at for the UK? Is there value in that? Has any of you had any engagement with it?

Sinead Magill: We are members of all the bodies that exist in the US. They are better at co-ordinating cross-sector and in the private sector. I think the resourcing constructs that they have are slightly different from the resourcing constructs that exist in the UK. If we could look to create something and work with DFID and the NGOs to do so, I think we would all be pleased.

Chair: That would be very welcome. Thank you very much for coming today to give evidence; it has given us a full picture of what you have been doing in the past 18 months. We will continue to maintain a focus and priority on this important area under Pauline's doughty leadership. Thank you very much for coming.