



House of Commons  
International Development  
Committee

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**Progress on tackling  
the sexual exploitation  
and abuse of aid  
beneficiaries:  
Government Response  
to the Seventh Report of  
the Committee, Session  
2019–21**

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**Seventh Special Report of Session  
2019–21**

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

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## The International Development Committee

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

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

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# Seventh Special Report of Session 2019–21

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The International Development Committee published its Seventh Report of Session 2019–21, [Progress on tackling the sexual exploitation and abuse of aid beneficiaries](#) (HC 605) on 14 January 2021. The Government response was received on 16 March 2021 and is appended below.

## Appendix: Government Response

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### Introduction

The Government welcomes the International Development Committee’s (IDC) report “Progress on tackling the sexual exploitation and abuse of aid beneficiaries” and is grateful to all those who contributed written and oral evidence.

Safeguarding against sexual exploitation and abuse and sexual harassment (SEAH) continues to be a priority for the FCDO and we have zero tolerance for any failure to address it. SEAH causes significant harm to individuals and undermines trust in the aid sector and efforts to deliver the Global Goals.

Since early 2018 the Government has tackled the challenge head-on, leading efforts internationally, and setting enhanced standards and vetting procedures for its own programmes. As the report acknowledges, notable progress has been made across the sector and the UK has shown leadership. We agree with the IDC however that SEAH perpetrated by aid workers still happens far too often. We believe that the extent of the problem has long been, and remains, under-reported. In the short to medium-term, therefore, an increase in the number of concerns reported is likely to be a positive sign that reporting channels are working and that victims feel able to come forward.

Sustained effort over many years is required. We will continue to help provide international leadership and to work hard to address these difficult issues. We will continue to ensure that all our delivery partners take all reasonable steps to: prevent SEAH from occurring; listen to those who are affected; respond sensitively but robustly when harm or allegations of harm occur; and learn from every case.

We will place the rights, needs and wishes of victims and survivors at the centre of our response. The UK strategy published in September 2020 sets out four commitments on safeguarding for all Departments delivering UK aid: we will continue to provide global leadership; we will hold ourselves to the same high standards that we expect of others; we will transform the aid sector so that everybody is treated with dignity and respect; and we will hold ourselves to account through transparent reporting and external scrutiny

The IDC’s report calls for future action to focus on three areas: showing zero tolerance and taking action against perpetrators; empowering aid beneficiaries; and supporting survivors. We agree. All three elements feature in the September 2020 strategy. Our

responses to the IDC's 30 recommendations in the six thematic areas are below. Unless otherwise stated we agree with each individual recommendation: we partially agree with numbers 5, 7 and 10; and disagree with 4 and 17.

## Reporting mechanisms, investigations and whistleblowing

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

From day 1 of its existence the FCDO adopted DFID's practices on investigations. The FCDO will build on these practices. Funding agreements do and will continue to require partners to report cases. The FCDO's Safeguarding Investigations Team continue to check the quality of case management. The FCDO continue to improve the skills of first responders and investigators, including through funding for investigator training, internal training on case handling, and materials and webinars open to all via the Resource and Support Hub.

2. *The FCDO should support initiatives to increase investigations capacity in the aid sector and work with its partners to ensure that the employment cycle schemes incorporate checks and balances to ensure they are just and fair to survivors and aid workers.* (Paragraph 30)

We are funding the CHS Alliance to establish the first ever certified SEAH investigator training course. Partner representatives are all actively involved in the three employment cycle schemes we support: Project Soteria with Interpol; the Misconduct Disclosure Scheme; and the Aid Worker Registration Scheme. We continue to consult with aid workers, survivor representatives and widely across the sector on all three schemes which also benefit from ongoing engagement with senior legal experts to ensure there are relevant checks and balances.

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

The FCDO regularly reviews the cost and likely effectiveness of all programmes as part of our programme management processes. The employment cycle schemes - Project Soteria, the Misconduct Disclosure Scheme and the Aid Worker Registration Scheme - are no exception. The schemes are aimed at strengthening international employment practices and promoting safer recruitment. The upcoming ICAI review of the UK's response to the safeguarding crisis in the aid sector may provide some additional external analysis and insights.

4. *The FCDO should undertake an audit to provide a full understanding of how whistleblowing practices are being implemented and used, to give confidence that whistle-blowers are actively supported and not retaliated against by their organisations.* (Paragraph 37)

Whistleblowing is one of the six pillars in our safeguarding due diligence framework against which we assess partners before funding them. We published last year a synthesis of the main findings from the central safeguarding enhanced due diligence assessments across 31 civil society organisations. Our due diligence guide makes it clear that the assessment of a potential partner’s enabling of whistleblowing should examine not only whether they have a policy, but also how it operates in practice. We will continue to reiterate this point to our programme teams. Relevant action is taken when the FCDO receives reports that suggest concerns about the whistleblowing practices of a partner. We continue to test private sector suppliers’ adherence to whistle-blowing obligations in the FCDO Supply Partner Code of Conduct. Periodic Central Assurance Assessments of multilateral organisations also look at whistle-blowing. We also continue to draw on other sources of relevant information such as the UN’s Joint Inspection Unit’s assessment of UN whistle-blowing in 2018.

The Charity Commission for England and Wales, with whom the FCDO including the Safeguarding Unit and the Safeguarding Investigations Team (SIT) is in regular contact, made it clear in their evidence to the IDC that they have made it easier for whistle-blowers to come forward and report their serious concerns. This means the Commission is well placed to identify any shortcomings in charities’ practices through its casework involving whistleblowing. Current or former employees from any of our implementing partners can, and sometimes do, contact SIT direct about whistleblowing concerns.

So overall we do not agree with the recommendation to carry out a full audit across our hundreds of partners which would be resource intensive, take years to complete and only provide a snapshot of performance. We believe that our current approach of assessing all partners’ whistleblowing capacity before we decide to fund them and our ongoing monitoring of their implementation of whistleblowing practices during the lifetime of that funding is a more efficient and effective way to check that whistle-blowers in organisations we fund are being supported and not retaliated against.

**5. *As part of its due diligence processes the FCDO should require organisations it funds to report to it the number of non-disclosure agreements they have signed, to help the FCDO to ensure that its partners are not misusing NDAs to silence individuals who raise legitimate concerns.*** (Paragraph 41)

We agree that NDAs must not be misused to silence individuals who raise legitimate concerns. We do not think that asking organisations as part of due diligence to report the number of NDAs they have signed is the most effective way of emphasising that point. NDAs are legitimate tools of business and counting their prevalence will not give us any information about improper use or whistleblowing. We are actively exploring adding language to our funding templates, Supply Partner Code of Conduct and Due Diligence process to make our expectations of partners even clearer and ensure programme teams and central compliance teams actively monitor the appropriate use of NDAs and manage the risk of abuse. So overall we partially agree with the recommendation.

6. *To facilitate the collection of data, the FCDO should make it clear to its partners that reporting cases of sexual exploitation and abuse will not be treated as a reason to be penalised, as long as they can demonstrate that they have robust mechanisms in place to deal with the misconduct. FCDO partners should report annually their total number of safeguarding allegations they receive and the number that are upheld.* (Paragraph 43)

We have regularly made that clear since 2018 and will continue to do so. It is up to partners if they publish annual case number data, but we will continue to encourage them to do so.

## Support for survivors and victims

7. *The FCDO should include the cost of supporting victims and survivors in grants and contracts for running programmes that it funds. The UK should work in partnership with victims and survivors to deliver the support they need, engaging with community-based organisations in country, to provide services to victims and survivors and providing funding and training if these are requested by those organisations. The FCDO should place requirements on its implementing partners to ensure that victims and survivors have free and safe access to the support and services they need and this support is not conditional on following a formal complaints process.* (Paragraph 49)

We require all implementing partners to think through in advance of starting any programme how they would provide support to survivors and victims where the perpetrator is a staff member or part of the delivery chain. Survivor support is complex and the existence of response services are often dependent on government provision or humanitarian emergency response. In fragile and conflict affected areas such provision is often inadequate or absent and beyond the power of implementing partners to fix in any meaningful way. The FCDO will consider any related requests for funding on a case by case basis as part of usual grant and contract management processes. In some very fragile and conflict-affected areas it may not be possible to ensure access to all the support and services that a victim or survivor request. Increasing the supply of such services in any given location will require coordinated action across multiple local, national and international partners which does not lend itself to including a requirement on individual partners through funding agreements. The FCDO continues to advocate for a sector-wide increase in support available to survivors globally, for example through the UN and other mechanisms. We will continue to work in partnership with victims and survivors and community-based organisations. Overall we partially agree with the recommendation.

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

Safeguarding Unit and Consular Assistance Department began conversations in 2020 about this join-up and we will factor in this recommendation as the work continues.

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

The Domestic Abuse Bill extends the jurisdiction of the UK courts so that, where appropriate, UK nationals and residents who commit certain sexual offences against adults outside the UK may be brought to trial in the UK. This could include British aid workers who commit any of the relevant offences overseas. Subject to Parliamentary approval, the Bill is expected to achieve Royal Assent in the Spring. As with all criminal offences, the decision to prosecute—whether for existing extraterritorial offences against children or under the new provisions when they become law - is a matter for the relevant prosecuting authority.

## Power dynamics and culture

10. ***The FCDO should prioritise organisations that demonstrate active engagement with local populations when it is tendering for aid delivery contracts.*** (Paragraph 65)

The FCDO has adopted a new criterion within its tender evaluation criteria to take account of additional social benefits that can be achieved in the delivery of Government contracts. The introduction of this Social Values Policy from 1st January 2021 allows in-scope tenders to explicitly evaluate the wider social impacts of a bidder's proposal. This will not be the only selection criterion and so overall we partially agree with the recommendation.

11. ***International aid organisations should work with local, community-based organisations in-country to continue to provide gender-based support and access to services throughout the covid-19 pandemic. This should be taken as an opportunity to consider how these services can be more locally led in future too.*** (Paragraph 68)

The FCDO's guidance to staff and implementing partners for the Covid-19 period states that Gender-Based Violence and child protection support services should be considered a core part of any humanitarian response and that SEAH survivors as well as victims and survivors of wider Violence Against Women and Girls and child abuse can be referred to those services. The guidance also says that in contexts where service provision is patchy, programme staff should consider whether their programme or team can support improved service provision for SEAH survivors, which could well be locally-led.

12. ***Managers should be held responsible for instilling an open and inclusive culture at their organisation that is actively anti-racist, where all staff are valued and safeguarding against sexual exploitation and abuse is ingrained in its daily operations. They should be reprimanded when it is clear this hasn't happened.*** (Paragraph 73)

The FCDO takes this approach internally, both on race and safeguarding against SEAH. Through our core documents and the work the Government has driven since early 2018 we remain consistently clear that safeguarding against SEAH needs to be ingrained throughout our partner organisations and we are quick to take action if it is clear that this is not happening.

The FCDO signed the Business in the Community (BITC) Race at Work Charter on day 1 of the new organisation and we are developing an action plan to implement our commitments which includes specific action on Bullying, Harassment and Discrimination. We also support organisations to make positive change, for example funding tools and resources which organisations can use to drive internal culture change on a range of issues.

## Standards, accountability and regulation

**13. *We recommend that the Core Humanitarian Standard on Quality and Accountability (CHS) is amended at the next opportunity to incorporate adequate measures to protect against sexual exploitation and abuse.*** (Paragraph 86)

In 2020 the FCDO funded the CHS Alliance to update the CHS Preventing Sexual Exploitation and Abuse and Harassment (PSEAH) Index to ensure that it incorporated all the elements of sector-wide safeguarding standards, including the FCDO Enhanced Due Diligence requirements on SEAH. The index was publicly launched in October and provides clarity on PSEAH requirements that need to be in place for organisations measuring themselves against the Core Humanitarian Standard. The CHS as a standard will be formally updated in 2021, through a broad participatory sector-wide process.

**14. *The FCDO should enforce the enhanced due diligence procedures developed by DFID and ensure compliance is more than a tick-box exercise at its delivery partners.*** (Paragraph 90)

The FCDO has done this from day 1 and will continue to do so. The FCDO established last year a Due Diligence Hub for staff whose purpose is to build capability on due diligence among staff and provide support when needed to ensure that due diligence assessments are carried out robustly and proportionately and that quality and consistency improve.

**15. *The FCDO should undertake further monitoring of its implementation partners' adherence to the enhanced safeguarding due diligence requirements in the countries where programmes are implemented to assess how they work with aid beneficiaries. The results of these assessments should be used to inform the FCDO's ongoing relationship with these organisations. If their implementation of recommendations is found to be too slow then the FCDO should consider the measures it has at its disposal—such as banning that organisation from applying for future contracts—to hold the organisation accountable for its actions.*** (Paragraph 94)

We will continue to monitor partners' adherence to the enhanced safeguarding due diligence requirements on an ongoing basis and performance will impact on funding decisions. The Supply Partner Code of Conduct sets clear expectations for contract-holders on the effectiveness of their safeguarding policies and processes. Compliance with the Code of Conduct standards is monitored throughout the life of the contract. A contract can be terminated if a supplier fails to comply with these requirements. While there is no ability to “ban” an organisation under the procurement regulations, the FCDO does consider any reasonable ground for exclusion against the advertised criteria.

**16. *In its response to this report the Government should set out how the CBCM model will provide an independent avenue to survivors to seek justice when the regular reporting mechanisms fail. It should also outline any other avenues it is exploring to ensure that proper oversight is introduced.*** (Paragraph 98)

A well-functioning Community-Based Complaints Mechanism (CBCM) can provide an avenue to survivors to seek justice and to improve accountability and support to survivors and victims at local and national level, including by linking survivors to support services. CBCMs are designed to be both culturally and gender-sensitive and to play a prevention function through training and awareness raising. The inter-agency CBCM model sits within broader country level structures in humanitarian contexts, including formal SEAH Networks and Coordinators.

As the inter-agency CBCM guidance referred to in footnote 128 of the Committee's report says, "independent review and referral of complaints is one of the most important functions of the CBCM." The guidance also highlights the benefit to beneficiaries of having the option of reporting to an agency which does not itself employ the alleged perpetrator of the misconduct, reducing the fear of reprisal. CBCMs cannot decide if a 'failure' has occurred. They can offer a view on whether good practice has been followed and provide an individual with an avenue to an organisation whose remit includes making such judgements and so alternative routes to report the incident and any concerns about the handling of the case.

Alternative routes or avenues that we have in mind include: the relevant National Human Rights Institution; legal service providers; a donor whose funding is involved in the project in question; a relevant oversight or ombuds body such as the Charity Commission if an NGO from England or Wales is involved; and relevant appeals bodies within the UN. We are also engaging with Dutch colleagues on a project which is looking in depth at the operation of community complaints systems in three countries. It will identify what it takes to build robust accountability systems that are survivor-centred, enable safe reporting, investigate thoroughly, and hold perpetrators to account. It will look at what works well and identify what needs to be improved.

**17. *The Government should amend the regulations to designate aid work as a regulated activity, requiring aid workers to undertake an Enhanced DBS check before they can work with aid beneficiaries.*** (Paragraph 100)

The Government is fully committed to ensuring that aid organisations have access to the information they need to make informed recruitment decisions and safeguard the vulnerable. We do not assess though that there is a gap in the system, but rather a need to help organisations make best use of the system.

For example, frontline aid work per se is not excluded from the definition of regulated activity: the definition of regulated activity in relation to work with children or vulnerable adults applies to aid workers as it does to workers in other sectors. So where the nature of the role meets the definition of regulated activity set out in legislation (for example roles involving the provision of health or personal care or unsupervised teaching, training or caring for children), and the employment decision is made in the UK, an enhanced criminal record certificate with a barred list check can be sought. Where the employment decision is made outside the UK and the work involves regular contact with children, an

International Child Protection Certificate (ICPC) can be sought from the ACRO Criminal Records Office. The ICPC confirms whether an individual has a criminal history and provides details, including relevant conviction and non-conviction data.

So while we disagree with the recommendation as written, in light of the concerns expressed by witnesses to the Committee and by the IDC, the FCDO has established a working group of officials from its Safeguarding Unit, the Home Office, the Disclosure and Barring Service, Charity Commission and ACRO. The group will work with safeguarding professionals from the UK aid sector to explore the issues faced by organisations in checking criminal histories of potential employees, what can be done within the existing framework, and also where there may be gaps or issues that need addressing.

To complement the checks available from the DBS and ACRO and to further support safer recruitment across the aid sector, FCDO is championing the employment cycle initiatives referred to in the response to Recommendations 2 and 3.

## The United Nations (UN)

18. *The UK should work with the UN to ensure that UN immunity is not being used to protect perpetrators and call-out UN entities that have misused immunity provisions.* (Paragraph 104)

We will continue to work with the UN to ensure the application of the UN’s stated policy that “UN staff members are not covered by immunity for acts that constitute crimes, and the Organization does not protect staff who commit such crimes.”

19. *The FCDO should set out how it holds the multilateral organisations that it funds to account when their safeguarding procedures are proven to be inadequate to prevent sexual exploitation and abuse by their employees.* (Paragraph 107)

The FCDO undertakes due diligence assessments on all our partners and will not provide funding to any multilateral organisation whose safeguarding procedures we consider to be inadequate. All organisations have room for improvement. Multilaterals have thousands of employees and even those with the strongest procedures are likely to see some cases of SEAH each year and will need to respond robustly but sensitively. Funding agreements set out our expectations and allow us to suspend, reduce or terminate funding in the event of major failings on safeguarding or any other issue. We consistently engage with all multilaterals on their safeguarding policies and practice and will increase that engagement if concerns emerge.

For example, the World Health Organisation (WHO) has a suite of ethical policies, which mirror UN policies. The UK consistently engages with WHO’s Compliance, Risk and Ethics Team to ensure these policies are enforced and developed. Following the allegations of SEAH by WHO workers during the Ebola outbreak in the Democratic Republic of Congo, the UK has used our governance position to push for a step-change in how WHO handles SEAH allegations more broadly. The UK co-led work on a Resolution supported by around 30 other countries, which was agreed at the 20 January WHO Executive Board. The Resolution ensures WHO is legally required to provide detailed, quarterly briefings on its work on the prevention of SEAH.

We have been, and will continue to be, vocal in advocating for greater resourcing for SEAH within WHO and that WHO take a more robust approach in SEAH advocacy with partner governments. While WHO cannot enforce policies or action by sovereign states, as the lead agency for global health it can play an important influencing role. Progress on safeguarding will be a focus of the UK's new core voluntary contribution to the WHO and will be monitored through avenues including Annual Reviews and the annual UK-WHO Strategic Dialogue.

In summary, we exert leverage and accountability in multilateral organisations by virtue of our governance position, including as part of Executive Boards, our financial contributions, our clear expectations in funding agreements, our robust oversight and joint working with other shareholders. The UK, alongside other donors, also secured agreement that MOPAN (the Multilateral Organisation Performance Assessment Network) will include SEAH indicators in its assessments of organisations' performance, starting in 2021.

**20. *The UK should advocate to the UN on its responsibility to protect whistle-blowers and the important role they play in bringing abuses to light.*** (Paragraph 109)

We will continue to do so. The Joint Inspection Unit (independent external oversight body of UN system) released in 2018 a comprehensive review of whistle-blower policies and practices in UN system organisations. The UK worked in the General Assembly to actively support the JIU's review and for full implementation of their recommendations. We will continue to push for this and for best practice policies and practices, to ensure that whistle-blowers are protected.

**21. *To ensure sustained high-level leadership on preventing sexual exploitation and abuse, the role of the Special Coordinator should be a full-time position.*** (Paragraph 116)

We will continue to make that point in the United Nations. The UK works closely with all the UN's mechanisms aimed at preventing and tackling SEAH, including the Special Coordinator's office which plays an essential role in coordinating and strengthening alignment of the UN's approach. It is vital this area is given adequate resource to ensure that the Secretary-General's strong leadership is translated into concrete action.

**22. *The UK should consider providing funding for the trust fund for victims to contribute to the vital services it supports.*** (Paragraph 117)

We have recently agreed to do this.

**23. *The UK should design its programmes for preventing sexual exploitation and abuse in a way that seeks to tackle apathy among middle and senior level leadership in peacekeeping missions and builds a strong safeguarding culture.*** (Paragraph 124)

We do not recognise the characterisation of apathy, but agree on the importance of ensuring all personnel, including the middle and senior leadership, are fully committed to tackling SEA. Vulnerable communities that peacekeepers have been sent to protect must be protected from exploitation and abuse. Projects which the UK has funded to help achieve this include: 'Sustaining Action Against Misconduct and Communication on the Women, Peace and Security agenda'; 'Redress for victims of SEA'; and 'Taking action to end SEA.' These projects focus on peacekeeping missions with the highest number of SEA allegations and provide technical guidance and workshops for field and

HQ leadership on communicating on misconduct and ensuring alignment with system-wide communications practices. The UK will continue to look for new ways to ensure SEA is embedded and prioritised throughout missions.

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

We continue to take action to address these issues in relevant UN fora that have oversight of peacekeeping, working with the Secretariat and Member States. For example, as a member of the Security Council we have sought to strengthen the requirements for missions to report to the Council on implementation of the Secretary-General's zero-tolerance policy (most recently Security Council Resolution 2552 related to the Central African Republic). We continue to ensure mandates require the repatriation of uniformed contingents against which there are credible allegations of widespread or systemic SEA, in addition to measures taken against individuals.

On resourcing, as a co-chair of the UN ministerial meetings on peacekeeping, including as host in London in 2016, we have sought to encourage more and higher quality Member State pledges of uniformed personnel available to peacekeeping missions. Since 2016, our programme funding has supported the development and implementation of the Strategic Force Generation Cell (SFGC) to improve force generation, encouraging and tracking pledges and carrying out visits to verify readiness, including training and equipment checks. We continue to maintain pressure for deployment decisions to consider performance and conduct history of Member State contingents, in addition to the mandatory checks on individuals.

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

**25. *The FCDO should ensure that any future procurement code incorporates the most stringent measures formerly used by either department to safeguard against sexual exploitation and abuse in its supply chains.*** (Paragraph 129)

The current Supply Partner Code of Conduct does this. We will look to strengthen the language on expectations as needed in future updates.

**26. *The measures set out in the Strategic Vision should be taken into consideration when the FCDO is deciding which programmes to prioritise and projects to improve gender equality should not be side-lined due to a lack of clear performance indicators.*** (Paragraph 131)

The Strategic Vision for Gender Equality continues to reflect and respond to the UK Government's ambitions on this agenda and will guide our future work. The FCDO will retain and build on the Strategic Vision, taking full advantage of our diplomatic and development levers. This work will include bringing a clear focus on implementation, in line with the recommendation made by the National Audit Office in 2020. The UK International Development Act (Gender Equality) 2014 continues to make a consideration

of gender equality in all UK development assistance a legal requirement. The Act puts the UK ODA commitment to gender equality on a statutory footing and ensures that gender equality remains at the heart of the UK's ODA work.

**27. For transparency, future progress reports should include an update on each aspect of the commitments, even if it is a nil return.** (Paragraph 132)

We are happy to do that.

**28. In recent years DFID has included a specific safeguarding section in its annual reports and accounts. In 2019–20 this included important data on the number of safeguarding reports that DFID received. This is good practice and should be replicated by the FCDO.** (Paragraph 133)

The precise structure of the FCDO's first annual report and accounts to Parliament is still to be finalised, but we certainly intend to replicate the approach taken by DFID in recent years.

**29. The FCDO should use the merger as an opportunity to reinvigorate the PSVI and the Gender Equality Division should develop a coherent strategy for the initiative which is coordinated with the wider priorities of the Unit. The FCDO should consider how the Research and Evidence Division can help to improve monitoring and learning so the initiative can be strengthened in future and adopt longer funding cycles to enable long-term planning.** (Paragraph 137)

The PSVI remains a top priority for the UK Government. We are the only government in the world to have a Prime Minister's Special Representative as well as a dedicated team and funding focused on tackling conflict-related sexual violence, including a PSVI Team of Experts that can be deployed to support specific contexts. The role of the Prime Minister's Special Representative has continued to be a ministerial appointment since its creation in 2014. Our global leadership role on the issue is widely acknowledged by international partners and in the United Nations.

PSVI has always had an institutional home in the FCO, and now the FCDO. Since its creation, PSVI has been led by the FCDO (previously FCO) with support from the then DFID and the MOD. The recent merger has provided further opportunities to integrate the strengths and expertise of various teams. For example, bringing the UK's development offer more into the PSVI campaign, and using the UK's co-leadership of the Generation Equality Action Coalition on Gender-Based Violence (GBV) to push for more action to tackle GBV in conflict and crisis, including sexual violence.

HMG recognised the need for improved oversight and strategic direction. As Lord Ahmad said at the November 2020 IDC hearing, the FCDO plans to lead the development of a three-year strategy with input from the MOD, and programme learnings from the Conflict Stability and Security Fund (CSSF), and the What Works to Prevent Violence programme. We will also develop an evidence-based Theory of Change, as part of the development of the strategy, with embedded monitoring, evaluation, and learning. We hope to begin a consultation process on the new strategy in early 2021.

**30. *The FCDO should ensure that safeguarding is properly budgeted for in programme contracts and is not undermined by wider value for money requirements. It should also show leadership on this issue among other UK ODA spending departments.***  
(Paragraph 140)

We continue to actively encourage partners to include costs and to build SEAH considerations into tender processes and funding proposals. Safeguarding against SEAH is a key plank of the FCDO's overall risk management approach and if we don't manage risk effectively we won't achieve value for money. We continue to convene all UK ODA spending departments quarterly and provide ad hoc support to other departments when requested and possible.