

Response to International Development Committee Inquiry into Sexual Exploitation and Abuse in the Aid Sector

Sightsavers is an international development organisation working in more than 30 countries worldwide, focusing on Africa and Asia. We work with local, regional, national and international partners and governments. With their help, we distribute treatments to prevent disease, carry out eye operations, advocate for disability rights and improve health services to create sustainable development projects. We're proud to be a leader in our field. We are one of only nine charities ranked as 'high performance' by the Department for International Development, and are one of US evaluator GiveWell's top charities.

We consider safeguarding our staff, partners and beneficiaries from sexual exploitation and abuse a key priority for our organisation. As such, we welcome this inquiry into the progress made by the sector. In the spirit of engagement and collaboration, we have felt it is important to answer each question posed in turn.

1. What mechanisms are in place to enable victims and survivors to report instances of sexual exploitation and abuse at the hands of the UN, other multilateral aid organisations, development aid NGOs, charities and the private sector (aid actors)?

Since 2018, Sightsavers has made significant progress in removing barriers to reporting, strengthening reporting mechanisms and engaging communities and staff in designing context-appropriate systems. We believe there has been a sector-wide response in ensuring victims and survivors' voices are heard with the appropriate action taken by responsible organisations as a result. Following our successful completion of an audit undertaken by Keeping Children Safe in 2018, we have progressed their recommendations around reporting. As such, we have received a notable increase in the number of safeguarding concerns raised by partners and communities to Sightsavers. These have been raised through our established reporting mechanisms which includes a dedicated email inbox which is monitored by our safeguarding team. Our network of country-level Dedicated Safeguarding Leads (DSLs) have also implemented reporting systems based on sector-wide good practice and adapted them to local contexts. These include the use of dedicated phone numbers displayed on community-designed posters at project sites, contact details communicated in local radio broadcasts and beneficiary engagement feedback groups.

A robust internal reporting system has also been developed where DSLs communicate concerns to the central safeguarding concern log. This log is then regularly reviewed by senior management and trustees ensuring action is taken. We have a designated safeguarding trustee who is an HR professional, and to whom concerns can be raised directly should this concern be about senior management. Furthermore, all organisations with which Sightsavers partners must complete a due diligence process which requires the organisation to have a functioning reporting mechanism for safeguarding concerns.

2. How do aid actors guarantee that when abuse is reported, it is dealt with sensitively and objectively, and appropriate action is taken against the perpetrator if the complaint is upheld?

Sightsavers has invested in both its internal investigation and concern management capabilities. When a concern is reported, it is initially logged in our central safeguarding concern log. It is then processed by the safeguarding team through a concern threshold register to determine next actions. Possible actions include a formal investigation into the allegations raised, informal or formal discussions held with the subject of the complaint or their line manager and a review of the environment in which the incident(s) occurred to address any apparent risks or gaps in process. Objectivity is ensured through the regular review of the safeguarding concern log by the nominated trustee responsible for safeguarding.

Sightsavers also ensures sensitivity when a concern is raised through its survivor-centred approach. This means in practice that we work to ensure the wishes of the survivor(s) are respected and acted on, wherever possible. We aim to keep them updated on decisions made and actions taken and seek their feedback on the outcome of an investigation. We also aim to ensure legal and psycho-social support is provided to those who require it. We believe that this is an important part of the process to ensure survivors are supported throughout and that their fears around physical safety or job security, for example, are addressed appropriately by local professionals.

3. How do victims and survivors access the psychological support and legal advice they need?

Within our concern management process, any support that is required by survivors is sign-posted by the relevant DSL. Where Sightsavers has established a duty of care towards the survivor, for example where an individual has suffered abuse by a Sightsavers staff member, funding for support services will be provided. Ahead of this, all Sightsavers DSLs conduct support services mapping within each country in which we operate.

We also ensure that we actively consider support needs of all those involved in the incident, including families, team members and partner staff. Where possible, we will combine support provision with other organisations who may be involved in the concern or who have contextual expertise. Similarly, we endeavour to provide advice to organisations on support for survivors with disabilities.

4. Are victims and survivors more likely to come forward now than they were before the issue re-gained prominence in 2018?

We believe that there has been an overall improvement in creating permissive cultures where survivors are more likely to report abuse. This is evidenced by our own systems

which have recorded a marked increase in reported concerns. Overall, there is evidence, based on our recent staff survey, to suggest that within Sightsavers working environments, including project sites and offices, staff feel empowered to report abuse or concerns and use whistle-blowing processes. However, an elevated risk remains in some contexts where local culture plays a part in restricting an individual's ability and intent to come forward. Although we have made progress in creating safe environments, underpinned by the work of our DSLs, we believe further training may be required in some areas to improve attitudes towards reporting concerns and other core behaviours.

Despite the progress made in removing barriers for staff to come forward, we believe there is still much to do in achieving similar progress for beneficiaries. In environments which Sightsavers has some measure of control and influence, such as offices, the use of training, policy and code of conduct implementation has allowed us to observe a change in attitudes and behaviour. However, in project areas and communities, particularly if an organisation is implementing through partner agencies, this is more complex. In addition, cultural perceptions around sexual abuse and barriers to reporting, such as familial or community-based repercussions (e.g. women and girls being forced to marry their rapist) add complexities which are difficult to manage. Therefore Sightsavers, having made significant progress in addressing the risk of sexual abuse within its own operating environments is focussing resources on addressing the needs of the communities which we serve. Current models include designing focus group discussions along thematic lines for beneficiaries to provide feedback on safeguarding and concern reporting processes.

5. What action should the new Foreign, Commonwealth and Development Office take to improve reporting mechanisms, strengthen independent investigations and oversight, support victims and survivors and provide access to justice?

We believe the FCDO should concentrate on three key areas. Firstly, use resources to build awareness of sexual abuse within national governments, specifically within law enforcement and the judiciary. A primary challenge that Sightsavers has encountered since 2018 is that communities regard us, alongside other development organisations, as an alternative to police forces to which to report concerns. This statement is based on the high number of community concerns that we have received, which although unrelated to Sightsavers from a duty of care perspective, would require investigation by a law enforcement agency. Clearly, as we have improved our ability to receive reports of abuse and take action, communities have identified this improvement (in some, though not all contexts) and have felt safer in reporting allegations to us. As such, we feel that national governments, which owe a duty of care to their citizens, could improve their levels of accountability and proactivity. We have also identified that core support services, such as domestic or sexual violence support, in many of our primarily sub-Saharan African operating countries are significantly lacking in focus and ability, if they exist at all. Therefore, we believe that this is an area which requires significant development.

Secondly, funding should be allocated in all programme budgets for safeguarding capacity building in all parts of the FCDO's supply chain. Investment is required to ensure the momentum is maintained to continue to tackle sexual abuse within the aid sector. A low risk tolerance of sexual abuse set by the FCDO requires appropriate funding to reduce the risk to a low level. When engaging with low income organisations, it is important to be able to work with them to improve their capacity on preventing and handling safeguarding concerns, for the sake of their employees and beneficiaries. By providing funding for this vital piece of work the FCDO is underlining its commitment to safe programming, by putting safeguarding at the forefront of all its funding. The messaging around safeguarding is strengthened when it is supported by funding for safeguarding capacity building.

Thirdly, we believe procedures need to be consolidated to allow for greater interoperability between organisations on investigations – this is to minimise impact on beneficiaries and low-income partner organisations. The FCDO could commit resources to a cross-sector group to examine the possibility and practicalities of this initiative.

6. What is your assessment of policies enabling reporting and speaking up across the sector? Are you confident that those wishing to report sexual exploitation and abuse are empowered to speak out?

It is our judgment that, generally, policies which enable those to report SEAH have been strengthened. However, we continue to have concerns over the empowerment of beneficiaries to report sexual abuse. One significant barrier is where national legislation does not support a safeguarding policy effectively, such as non-prohibition of child marriage, FGM, child labour or inter-marital violence. As noted elsewhere in our response, we have received an uptick in reports from beneficiary communities which we believe is a result of low confidence levels in the intent or ability of law enforcement to act. Indeed, we have anecdotal evidence from survivors of sexual and physical abuse that often, law enforcement is not suitably equipped, trained or obligated to investigate allegations of this nature.

7. How well are reports of abuse acted on? Are they dealt with promptly, impartially and fairly through robust investigation and disciplinary processes?

Sightsavers has developed an internal investigation framework which is underpinned by the principles of impartiality and objectivity. We have also invested in our safeguarding team's abilities to both manage and conduct safeguarding investigations. The introduction of an internal investigation and disciplinary process has improved our ability to manage allegations of sexual abuse within Sightsavers should one be reported. Improvements, though, have been limited within our implementing partners or at community level. We do have several positive examples of a complaint resulting in the dismissal of perpetrators within a downstream partner organisation. However, this was following action taken by Sightsavers as a result of the complaint being raised to us, rather than to the partner

organisation. As such, we have committed resources to build the capacity and capabilities of our partners to an acceptable level and have included reporting processes as a pre-requisite for partnership agreements. However, we anticipate that country-level partners require sizeable investment and development in order to ensure investigations and disciplinary action are prompt, robust and fair.

8. What measures, legal and otherwise, have been taken since 2018 to actively support whistleblowers who disclose sexual exploitation and abuse?

Sightsavers establishes anonymity as a key principle within its whistle-blowing policy to reduce the risk of exposure and harm. In recent cases, we have also developed whistle-blower protection plans which include mapping legal and psycho-social support services and nominating trained personnel within Sightsavers who act as the liaison for whistle-blowers should they require assistance. We have also ensured that in cases where abuse has been committed as a result of process gaps within partner organisations, the resulting action plan to address those gaps includes protection of whistle-blowers as a condition of continued funding.

9. Are whistleblowers adequately protected from retaliation and are those who retaliate against whistleblowers held to account?

Sightsavers does not have evidence from within its own operations to suggest that whistle-blowers have suffered retaliation as a result of their actions. However, we ensure that any retaliation against whistle-blowers is not tolerated and is regarded as gross misconduct as per our Global Whistle-blowing Policy.

10. What tangible actions have aid actors taken since 2018 to address the workplace culture that had enabled abuse to persist?

We have stated elsewhere that we reject the assumption that all aid and development organisations maintained a toxic workplace culture. We believe that a statement from the Committee recognising that not all those engaged in aid and development work have enabled abuse to persist would be well received.

We regularly consult with staff around these issues and our latest anonymous staff survey, published in July 2020 with 99% participation, demonstrated that 96.9% felt proud to work for Sightsavers and 90.4% felt that they were treated fairly and with respect (Only 1.6% said they did not agree with the statement that they were treated fairly and with respect). We also directly engage staff over their perception of safeguarding and whistle-blowing. For example, 92.6% stated that they knew who to speak to if they were concerned that someone connected to Sightsavers was harmed or at risk of being harmed. 92.2% knew which policy

to refer to in regard to having concerns over someone being harmed and 93.3% knew how to raise a concern if they suspected someone at work was doing something seriously wrong.

On behalf of a major donor, the Bill and Melinda Gates Foundation, in 2019 Sightsavers also underwent an in-depth review of our culture and effectiveness. This review encompassed 1:1 interviews with staff and other stakeholders across the organisation and established that a strong and collaborative working culture was evident in Sightsavers and that safeguarding in particular has been a major areas of investment.

We do, however, recognise that we have a responsibility to reduce the risk of abuse taking place within Sightsavers and within our programmes. As a result, since 2018, we have made significant progress in formalising these responsibilities and expectations. These include the implementation of a code of conduct for all staff, consultants and representatives to sign and adhere to. This document is linked to our revised safeguarding policy which details core behaviour and culture that we expect from our staff as well as how SEAH is tackled within our operations. We have also developed our training package for staff to ensure that we encourage a positive culture within our organisation and remove barriers to reporting and whistle-blowing. This training is mandatory for all staff and trustees and completion is monitored by our compliance team. Sightsavers has committed to the appropriate resourcing of safeguarding and as such has developed a network of country level Designated Safeguarding Leads (DSLs) and appointed a Safeguarding Manager to oversee the management and implementation of our safeguarding framework. The Sightsavers Chair has also appointed a trustee to assume responsibility at board level. All directors, including country and regional directors, also now have safeguarding responsibilities reflected in their job descriptions. We have encouraged positive culture change with our partner organisations by using an enhanced due diligence tool to review a potential partner organisations' processes and culture. We also insist that all partners sign our code of conduct.

11. Are there still challenges that need to be addressed for culture change to occur?

Yes. Challenges remain in embedding cultural change within our country-level partner organisations. More work also needs to be done by the sector to better embed safeguarding in standard programme design, so it is not viewed as a condition of funding but rather an enabling function which supports programme implementation.

In order to improve ownership of safeguarding practice, the sector must work with country-level partners and governments to remove what at times can be perceived to be a paternalistic and global-north centred approach. Safeguarding must be applied in a context specific manner, reflecting the current reporting mechanisms in place in-country. For example, by acknowledging that the mechanisms used in the UK such as reporting abuse to the police, may not always be in the best interest of the survivor. We must work with existing systems to help strengthen them and avoid encouraging people to report concerns to

entities which currently have no capacity to effectively manage them or provide victim support.

12. Would you recommend any changes to the relevant standards and certification schemes in the sector, such as the Core Humanitarian Standard, Humanitarian Quality Assurance Initiative, UN Minimum Operating Standards and Keeping Children Safe, to ensure that organisations maintain adequate safeguarding procedures?

It is important to continue to maintain high standards, such as those mentioned. It is also important to ensure that low income organisations can access such guidance or support. This is especially relevant to entities such as Disabled Peoples' Organisations, which represent the rights of people with disabilities who we know to be vulnerable to abuse. It is important to empower these organisations to meet equally high standards as those organisations which can afford membership to KCS or the CHS alliance. The Resource Safeguarding Hub is a good example of efforts to make safeguarding guidance accessible to all though this should be increased in scope.

13. What are the repercussions for organisations that are in receipt of UK Official Development Assistance (ODA) and are found to have insufficient policies and practices in place to detect, prevent, and tackle abuse when it arises?

DFID has established robust due diligence processes to assess an organisations' policies and practices that it uses to address abuse. We assume that the FCDO will maintain this level of scrutiny and as such, we believe that the repercussion for organisations which fail this due diligence process is to lose the ability to receive funding until this is rectified.

14. What requirements does DFID currently have of implementing agencies with regards to safeguarding procedures and what actions should the new FCDO take to ensure that all the actors it is funding uphold the highest standards possible?

It is our view that the FCDO should ensure adequate funding is supplied for maintaining the momentum in addressing SEAH in the aid and development sector. We also believe the FCDO could utilise its position to coordinate cross-sector initiatives, inclusive of other major donors and governments, to address areas such as beneficiary engagement in system design and improving safeguarding standards within beneficiary governments.

15. What is your view of the employment-cycle initiatives for tackling sexual exploitation, abuse and harassment (SEAH); the Misconduct Disclosure Scheme, Project Soteria and the Aid Worker Identification Scheme? Do you think this is the most effective way of tackling SEAH?

It is our view that the various employment cycle schemes expose organisations to other risks which have yet to be appreciated fully by the entities driving the schemes. For example, the legal review of the Aid Worker Registration Scheme was lacking in detail regarding how the scheme could comply with human rights, employment and data protection legislation in all jurisdictions. The practicalities of implementing the scheme across all those working in aid and the costs of doing so have also not been fully considered. We believe that registration of staff who are employed in beneficiary-facing roles and who are engaged in humanitarian response is appropriate. Requiring all staff who are employed in development organisations, however, including country-level and partner organisation staff is disproportionate.

We also have significant concerns over the storage of personal data, particularly regarding the biometric data required by the Aid Worker Registration Scheme. We believe this increases the risk of personal data loss to our staff and partners to unacceptable levels. Any entity which stores the data must be appropriately resourced to provide high levels of security and indemnity.

We also have concerns over how the retention of personal data by an entity, which would presumably be situated in the global north, would be viewed by those who ascribe the aid and development sector as being neo-colonialist and white supremacist. We believe that demanding the biometric data of staff and partners who live and work in the global south will exacerbate these allegations and cause further reputational damage to organisations and the FCDO.

16. Is there scope for aid actors to consult the register of child abusers to ensure they are not recruiting known offenders?

It is Sightsavers' position that employees who have direct access to child beneficiaries as a part of their roles should be subject to enhanced screening, where legal.

17. What are the opportunities for improvement under the new FCDO which will bring the Safeguarding Unit, existing initiatives to tackle SEAH, and the Preventing Sexual Violence in Conflict (PSVI) programme under the same department and Secretary of State?

The FCDO must provide tangible objectives and definitions for organisations to work under. This did not occur in 2018 which resulted in a lack of co-ordination and cohesion overall. Financial and non-financial resources were not being used appropriately: money was being spent by all organisations on re-engineering safeguarding policies; DFID funds were being used by multiple organisations to work with the same partner in developing policies and systems. It is critical that the same approach is not adopted as we scale up activities more directly with beneficiaries. For example, organisations working within the same communities may have differing perceptions of duty of care and what constitutes SEAH. This results in

confused reporting lines, a pedestrian attitude towards responsibility and ultimately limits effectiveness of safeguarding processes and support for survivors. By setting objectives and clarifying definitions, the FCDO can assist organisations in avoiding this.

Further, the FCDO should clarify within their agreements with supplier organisations their expected extent of the supplier's duty of care within programmes. Currently, resources can be used to address concerns which can be viewed as unrelated to an organisation's operations yet must be acted on due to an unclear mandate.

I would like to thank the inquiry for allowing Sightsavers to submit our evidence to this important review.

Yours sincerely,

A handwritten signature in black ink that reads "Caroline Harper". The signature is written in a cursive, flowing style.

Dr Caroline Harper CBE

Chief Executive

Sightsavers