

Submission of Written Evidence by Save the Children to the International Development Committee's Inquiry on Sexual Exploitation and Abuse in the Aid Sector

Save the Children was founded 100 years ago in London. It is now a global movement operating in 120 countries, fighting to ensure that all children survive, learn and are protected. As well as working to improve our organisational systems and structures, we have been working with partners across the aid sector, including the Department for International Development, to improve safeguarding and reporting mechanisms for sexual exploitation and abuse.

SUPPORT FOR VICTIMS AND SURVIVORS

1. Sexual exploitation and abuse have a devastating and longstanding impact on victims and survivors, with this harm being compounded when it is perpetrated by those in positions of power and authority. We do not tolerate nor condone any act of exploitation or abuse and acknowledge the harm done by those who misuse the position of trust they hold in the course of their work.
2. Current reporting mechanisms vary across the sector and are often organisation-specific. In some programme locations this is even more complex, with multiple agencies operating in the same location with different mechanisms. The decision to report an exploitative experience is always a difficult one and requires significant courage on the part of the victim or survivor; made yet more challenging when those making reports may not be certain about which NGO or agency employed the perpetrator.
3. Save the Children UK has taken steps to enhance its approach to providing support to those reporting exploitation and abuse through the establishment of a dedicated Wellbeing Team. The Wellbeing Manager leading this work has extensive experience in providing services and support to victims and survivors of sexual violence, particularly in the field of Violence Against Women and Girls (VAWG). We have produced a dedicated protocol, which outlines our approach to supporting anyone raising a concern about exploitation and abuse, including the allocation of a Wellbeing Advisor to support them for the duration of any investigation and beyond. The Wellbeing Team is available to support any adult victim or survivor with whatever services they may require, regardless of whether they wish to participate in an investigation process. The terms of engagement are explained to anyone wishing to take up the service, including their right not to accept such support from us.
4. Maintaining a focus on the needs of victims and survivors is critical to success and need to remain a priority for all those involved in safeguarding work across the sector. A challenging aspect of this focus is when a victim or survivor is unwilling to consent to their case being referred to the police, but safeguarding professionals consider that the victim's testimony indicates that the alleged perpetrator poses a risk of harm to others. To address this challenging situation, we commissioned a targeted piece of work from external agencies; this work engaged with victim and survivor groups, those providing services to them and senior specialist law enforcement officers. This provided a clear process to ensure that victim and survivor views were respected, but also ensured that intelligence could be made available to law enforcement, which could be used for reducing harm elsewhere.
5. While sector-wide reporting of exploitation and abuse pre-pandemic showed signs of increases, which should be viewed as a positive indicator of culture and trust, this remains likely to be a very small representation of the exploitation occurring in the sector.

6. Following its establishment, the Foreign, Commonwealth and Development Office, in conjunction with the sector and existing partners, should provide additional leadership and resource to grow the capacity to detect misconduct, in addition to making it as easy as possible for the victims and survivors to report. There are encouraging signs that Project Soteria, the existing partnership between the Aid Sector, the Department for International Development and Interpol, will help facilitate this objective.

SPEAKING UP

7. Policies underpinning effective reporting and response seem to have improved across the sector, which is consistent with our organisational experience of continually refining our approach to this critical issue. The heightened safeguarding focus of donors since 2018 has seen clearer expectations being set for those delivering aid projects, including the enhanced due diligence requirements issued by DFID, which include requirements that organisations have a whistleblowing policy, which protects whistleblowers from reprisals and includes clear processes for dealing with concerns raised.
8. The distinction between reporting and whistleblowing is an important one, both for those reporting and those assessing the sector's ability to safeguard the most vulnerable. Reporting, through organisational or community-based mechanisms, should be the most prevalent route for an organisation to learn about concerns and take immediate action. Whistleblowing, usually through escalation directly to senior staff or trustees under the auspices of a Whistleblowing Policy, should be a less common occurrence and seen as an indication that there is a lack of confidence in the standard organisational reporting or response mechanism. Reporting and Whistleblowing are not interchangeable terms.
9. The increase in pre-pandemic safeguarding reports across much of the sector is an indication that there is greater confidence that organisations can and will respond appropriately. There has also been progress in attempting to ensure that reporting mechanisms are suitable for the context in which they operate. An example of this is the recently created hotlines for the Girl's Education Challenge (GEC) programme in the Democratic Republic of Congo (DRC), in which Save the Children is a partner.
10. Six months ago the GEC project set up two hotlines and in their first two quarters of use, these hotlines received large numbers of calls. One of these was a Child Safeguarding hotline, with a free-to-call memorable three-digit number and provided an additional route to collect information on accountability, whistleblowing and child safeguarding. The local acceptance of the hotlines was important, including ensuring that the number was easy to access, comfortable to use and that confidentiality would be maintained. The multilingual hotline monitors not only respond to calls in the 3 local languages, but also ensure a rapid follow up of issues raised. In the first six months of use 1,220 relevant calls were received by the Child Safeguarding Hotline, with around 37% of calls coming from children themselves. In the last quarter, 711 complaints of varied kinds were reported through the hotline, while only 27 were received directly face-to-face, and only 13 in a complaints journal. No complaints were received at all through the more traditional suggestion box method.
11. The response to reports of exploitation and abuse should always be consistent with the best interests of the victim or survivor and in accordance with best practice. While there are established investigator training courses available, most notably from CHS, the adoption of these courses is not universal and a lack of standardisation may create difficulties in the

implementation of sector-wide initiatives such as the Aid Worker Registration Scheme and Project Soteria.

CULTURE CHANGE

12. Save the Children has carried out extensive culture change work in recent years to promote respect in the workplace and build a kind and inclusive culture that allows reporting and whistleblowing with confidence. Following an Independent Review of Workplace Culture in 2018, Save the Children launched its 'Stronger Programme', led by our staff, to take forward and implement the report's recommendations to improve our workplace culture, staff wellbeing, line management capability and drive diversity and inclusion. This has included a full-time team of staff seconded from across the organisation to drive change this year and we have invested in specialist new permanent expertise on staff wellbeing and diversity & inclusion.
13. Save the Children has introduced new Anti-Bullying & Harassment and Whistleblowing policies and all staff members have to take compulsory Respect in the Workplace and Code of Conduct training to provide guidance on what employees expect of each other and what conduct will always be unacceptable. Managers are provided with additional training which covers harassment and bullying, support on how to report concerns, unconscious bias, and equality and diversity.
14. We also provide access to an external 'Integrity line' – run by Crimestoppers, this allows staff to anonymously report concerns 24/7 and an Employee Assistance Programme for all staff which includes an online wellbeing portal, a free 24/7 confidential phone service and referrals to counselling services. The service covers a range of issues which may affect employees, including home life, health, money, legal and work life.
15. These measures have improved the routes staff have to report concerns, and we are reviewing how effective they have been. As we check and strengthen these protections, we have also put in place an agreement with an external HR provider so that any allegations of misconduct against senior members of staff can be investigated independently.

STANDARDS

16. We would support any steps that helped to align the various standards, particularly those favoured or applied by donors. The adoption of a single, accepted, set of standards which could be independently verified and relied upon by donors would be a significant step forward; this would also allow organisations to redirect resources currently spent meeting differing standards into the frontline of safeguarding activity, and reduce the likelihood of failings caused by confusion between differing required standards or reporting systems.

ACCOUNTABILITY

17. There are differing views on the withdrawal of funding from agencies who fail to safeguard effectively. On the one hand there is a critical need to ensure accountability and repercussions for failings, however there are risks that the withdrawal of funding in the event of failings can reduce the likelihood of agencies being open about and seeking help to deal with serious organisational challenges, and as a result it can incentivise unhelpful behaviours.
18. Save the Children has worked in partnership with the wider sector, Bond and DFID to develop the existing employment cycle initiatives, which we believe will have a significant

impact by creating a safeguarding framework around aid work and help ensure that collective focus is never again lost on such a critical issue.

19. While we consider that each of the employment cycle initiatives make a contribution in their own right, we believe that the strength of the initiatives is that they will combine to create an impact that is much greater than the sum of their parts. The behaviour and determination of some offenders requires significant steps to ensure that their access to the most vulnerable is denied.
20. Project Soteria, the sector partnership with Interpol, is a critical element of the global framework required to enhance the safeguarding of the world's most vulnerable. We are strongly supportive of the work being scoped and are confident that the appropriate, focussed, engagement of law enforcement on tackling gross breaches of human and child rights is the right step.
21. Save the Children UK and Save the Children International are signatories of the Misconduct Disclosure Scheme and support its further development. We support the Steering Committee for Humanitarian Response (SCHR) in their management of the scheme and believe it should be extended, as soon as the SCHR are content, to a broader group of aid and development actors.
22. Save the Children has worked on the concept of the Aid Worker Registration/ID Scheme with DFID for a prolonged period, helping to establish the basic needs analysis and the steering committee that now co-ordinates the work. All safeguarding specialists know the lengths to which some perpetrators of abuse will go to find access to vulnerable people, including hiding their identity and manipulating their career histories to hide gaps or roles in which they were accused of harm. We believe that a system that verifies the identity of an aid worker, or potential aid worker, and makes their career history available to appropriate people is an important step in laying the foundations that will help us and our successors in years to come to prevent unsuitable people from gain access to vulnerable people in the sector.
23. These initiatives, combined, begin to create a robust foundation on which the effective safeguarding of children, vulnerable people and aid workers can develop. We believe that these initiatives are an important investment in our shared capacity and accountability, which will allow further important work to develop.
24. Save the Children, like Bond and others, has recommended to the UK Government that greater and simplified access to UK criminal records checks should be made available to the aid sector. The designation of aid work, on an agreed definition, as a Regulated Activity under the relevant legislation would make obtaining a UK criminal records check a legal requirement for those eligible, but also require employers who dismiss anyone for safeguarding misconduct to report the details to the Disclosure and Barring Service (or the Scottish and Northern Irish equivalents), an important additional accountability for UK-based agencies. While we accept that most aid workers are not UK residents and might not be eligible for these checks, those who are should be subject to them; and the UK Government should prioritise this as a clear indication of its desire to prioritise safeguarding in the sector and have the UK lead on such standards.

NEW DEPARTMENT

25. We encourage the FCDO to work with the Cabinet Office and other Whitehall Departments to implement the Predecessor Committee's recommendation to make aid work a regulated

activity under the relevant legislation. We also encourage the new department to provide yet further focus on system-wide solutions which include the widest range of aid actors, including UN agencies and those not bound by donor terms and conditions.

26. The FCDO should retain the existing Safeguarding Unit approach used by DFID, ensuring that it has authority across Government, and that it is able to effectively engender safeguarding as a priority in the founding principles of the new department. Restructuring the existing safeguarding framework through the merger would be a backwards step that would risk disrupting progress made in recent years.