

International Development Committee  
Sexual exploitation and abuse in the aid sector: next steps

*Written submission on behalf of Oxfam GB*

18 August 2020

## Introduction

Oxfam welcomes this inquiry. Sexual exploitation and abuse (SEA) is intolerable wherever it occurs, but particularly in a sector dedicated to supporting the world's most vulnerable people. Since our failings in Haiti in 2011, Oxfam has been on a journey of improvement to ensure we are living up to our values and fulfilling our duty to do everything we reasonably can to provide a safe environment for all those we work with, as well as all those who work for us. In this submission, we wish to outline some of our experiences in implementing action and suggest some areas for future focus.

Oxfam treats all allegations of sexual exploitation and abuse very seriously and investigates each one thoroughly. Among many policies - as outlined in our latest progress report<sup>1</sup> - we have a confidential whistle-blowing hotline, a dedicated Safeguarding Team, and safeguarding contact points within all the countries where we work. Oxfam International also regularly publishes global safeguarding data on its website<sup>2</sup>.

In recent years we have worked hard not only to raise awareness amongst staff and improve how we handle allegations but also to change the culture in which we work to prevent the abuse of power which is often at the heart of SEA cases and to support those that speak out.

We actively encourage people to report wherever they have a concern - and we have seen more people come forward as a result. We believe that only by being open and transparent about the problem can we tackle it. We are committed to continually learning and improving in order to protect our staff, volunteers and the community members we serve from sexual harassment and abuse.

The coronavirus pandemic has necessitated an urgent review of our existing SEA plans. The risks related to SEA are heightened in the face of stress, fear, economic uncertainty and chaotic environments. At the same time, the barriers to reporting and the challenges of quickly and effectively responding have also increased. Oxfam is acting fast to adapt to this new context. In response to coronavirus, we have created a number of additional tools for staff and partners and we have been working in collaboration with interagency mechanisms to support and deliver best practice initiatives in these unique circumstances.

This submission is divided into three sections in response to the thematic areas of the inquiry: i) Speaking up ii) Support for victims and survivors, and iii) Culture change.

---

<sup>1</sup> Improving safeguarding and culture at Oxfam report, April 2020  
[https://oi-files-d8-prod.s3.eu-west-2.amazonaws.com/s3fs-public/2020-06/Improving%20Safeguarding%20and%20Culture%20at%20Oxfam%20Progress%20Report\\_April%202020.pdf](https://oi-files-d8-prod.s3.eu-west-2.amazonaws.com/s3fs-public/2020-06/Improving%20Safeguarding%20and%20Culture%20at%20Oxfam%20Progress%20Report_April%202020.pdf)

<sup>2</sup> [ibid.](#)

## Section 1: Speaking up

It is vital that all aid organisations are accountable to affected populations. Key to this is to establish multiple channels for reporting sexual exploitation and abuse, to take active steps to establish awareness of those channels and to give survivors and witnesses the trust in our people and processes which will allow them to report. We have a number of systems in place for individuals to report their concerns. Traditional whistle-blowing mechanisms such as confidential phone lines and email addresses, available in multiple languages, can work well for employees and partner organisations. However, we have found that the majority of concerns coming from communities are instead reported via dedicated country-based staff who act as 'Safeguarding Focal Points'. Our research suggests that this is because they are known and trusted more than anonymised systems.

Under-reporting by local communities of misconduct is known to be an issue across the sector. In order to better understand what barriers prevent people coming forward, in 2019/20 we conducted research<sup>3</sup> in Myanmar, Iraq and Ghana, the outcomes of which we presented in a session for DfID safeguarding personnel. The findings uncovered a range of aspects which prevent people coming forward: some are common to most allegations (for example that many survivors prefer to remain anonymous and social norms mean that women are reluctant to speak up), while others are more specific to a particular country context. Members of a community may deal with incidents within their own community or would only report incidents to trusted sources. Even then, it is often felt to be too risky to report incidents or oppressed women see violence and sexual harassment as the norm, and so do not report it. Based on this research, Oxfam has been working much more closely with communities to design programmes to ensure that the risks to women and girls are better understood and mitigated in the programme at the design stage.

Speak up and whistle-blowing policies are important protections to have in place. However, these alone do little to encourage reporting. In the eye of a survivor, the power imbalances that contribute to abuses often supersede any protection guaranteed by organisational policy. Reporting of SEA cases requires a high level of trust in the organisation receiving the complaint.

### Supporting people who disclose abuse

Measures, legal and otherwise, to actively support whistle-blowers who disclose sexual exploitation and abuse are vital. At Oxfam, we have established clear, standard operating procedures to ensure a more consistent, survivor-centred approach to responding to cases, demystify the reporting process and building trust. We have also increased the number of dedicated safeguarding staff to respond to cases - Oxfam's confederation-wide Safeguarding Shared Service now includes 33 safeguarding positions and 182 trained focal points at country level.

These procedures include the need to do all we can to protect the confidentiality of survivors and witnesses, as our regular risk assessments often disclose the potential risk of retaliation against them. In certain cases where retaliation was alleged, we have worked with local legal experts to find a solution while protecting the survivor from further retaliation.

<sup>3</sup> Factors Influencing Misconduct Reporting: A meta-analysis – Oxfam report, July 2020

<https://policy-practice.oxfam.org.uk/publications/factors-influencing-misconduct-reporting-a-meta-analysis-621022>

It is also vital to protect those who report abuse from retaliation, and that anyone who does retaliate is held to account. Retaliation can be difficult to prove and can often manifest in the form of supposed “performance management”. However, having dedicated safeguarding staff to work with survivors and witnesses allows us to identify potential risks, put in place mitigation measures, and document potential retaliatory action for further investigation.

We understand that strengthening reporting mechanisms will be an ongoing and cyclical process where we continue to evaluate and improve. Organisational policies relating to SEA are regularly reviewed and are published on our website.

## Section 2: Support for victims and survivors

It is essential that, when abuse is reported, it is dealt with sensitively, and appropriate action is taken against the perpetrator if the complaint is upheld. Since 2018, Oxfam has recorded a higher number of people reporting cases of SEA, including some historic cases as we actively encouraged people with non-recent allegations to come forward. Up to date safeguarding data for the Oxfam confederation is published in our Progress Report<sup>4</sup>.

In general, the majority of SEA cases that are currently reported come from staff and relate to alleged harm to staff, rather than coming from community members relating to harm to them. Many survivors of SEA prefer to report face-to-face, including to staff from different organisations and support services. We are working not just with staff but with all groups with whom we come into contact. We are also building on the learnings from the misconduct reporting research referred to in Section 1 above to improve awareness of complaints channels and to build trust in our response. We hope and expect that this will in time contribute to greater reporting of cases on behalf of community members.

Our experience is that the key to consistent, quality and safe response to SEA allegations is to ensure that (i) standard operating procedures for managing cases are in place and are consistently implemented by people with the right capabilities and capacity to do so; (ii) local referral pathways, labour laws, and legal frameworks are clearly mapped out in all the countries where we work so that we can act appropriately and as swiftly as possible when a case is reported; and (iii) all staff who interact directly with community members and/or who might receive complaints are trained on how to respond and how to report. Additionally, having experienced SEA investigators who can be swiftly deployed and safeguarding support in regions and countries is an essential aspect of survivor-centred case management.

A great deal of focus from the sector over the past two years has been on establishing organisation-wide policies and procedures. This was an essential step to ensure that cases are handled safely. With this step largely completed, it’s important for the sector to focus now on programme and

---

<sup>4</sup> Improving safeguarding and culture at Oxfam report, April 2020 [https://oi-files-d8-prod.s3.eu-west-2.amazonaws.com/s3fs-public/2020-06/Improving%20Safeguarding%20and%20Culture%20at%20Oxfam%20Progress%20Report\\_April%202020.pdf](https://oi-files-d8-prod.s3.eu-west-2.amazonaws.com/s3fs-public/2020-06/Improving%20Safeguarding%20and%20Culture%20at%20Oxfam%20Progress%20Report_April%202020.pdf)

country-level efforts to raise awareness about the rights of communities, expected behaviour of staff, and how to complain.

#### Need for greater investment in gender-based violence services

Gender-based violence (GBV) services are an essential part of effective SEA response. Survivors of SEA should be referred to existing GBV support services in their own communities, in order to provide a culturally sensitive and appropriate response (unless a survivor wishes to be relocated). GBV services in many communities where we work are severely lacking – in particular psychological and legal support. While organisations can attempt to provide ad hoc support to supplement gaps in locally available assistance, this can create a negative hierarchy wherein survivors of SEA which is reported to aid organisations have access to far greater support than survivors of GBV. This can expose survivors and create tension within the community.

It is essential that the new Foreign, Commonwealth and Development Office (FCDO) increases investment in GBV services in both humanitarian and development contexts to ensure that GBV survivors have access to assistance. This should be channelled through GBV coordination mechanisms, such as the sub-clusters or sectors. Ideally, a proportion of ringfenced aid funding should be dedicated to GBV service provision.

Requirements around complaints and feedback mechanisms should also be included in all FCDO-funded projects. Grantees should be encouraged and funded to include activities and budget for the design and/or review of complaints and feedback mechanisms, the training of staff on handling complaints and psychological first aid, and the development of indicators to monitor the effectiveness of these mechanisms.

### Section 3: Culture Change

Accountability and support for victims and survivors are vital for addressing SEA. But these efforts will be insufficient unless issues around organisational culture are also addressed in order to fully embed a systems-change approach to tackling abuse.

Inclusivity is key to this. In high-risk environments such as humanitarian responses, a key element of safe programming is an inclusive approach to risk management. Good risk analyses draw on the perspectives of a diverse group of people - including national staff, partner organisations and community representatives - asking what risks they are most worried about and how they think they might be mitigated. It is important to have a culture that recognises the importance of consultation even when there is a need to act fast in an emergency, and is committed to reviewing these risks regularly, drawing on additional feedback from listening groups and complaints mechanisms, and adapting as necessary.

Another important aspect of organisational culture is recruitment. At Oxfam GB we have strengthened our recruitment and induction processes for all staff, as well as the training that looks at attracting talent and providing a consistent employee experience. Safer recruitment training is mandatory for all recruiting managers and we are a participating member of the Inter Agency Misconduct Disclosure Scheme for checking references.

We recognise that embedding culture change throughout an organisation takes time and involves work to tackle broader systemic issues and social norms. As part of our ongoing efforts to make Oxfam more diverse and inclusive, we have established a new cross-country working group that focuses on four key areas: LGBTQI, Disability, Gender, and Race. A range of initiatives to challenge staff to address unconscious bias and their role in shaping workplace culture are underway, including 'Active Bystander' training to challenge negative behaviours such as bullying, supporting leaders to navigate diversity in their teams, and encouraging 'safe spaces' and staff-led networks where people can share experiences and learn from each other about issues such as racism, sexual identity and hierarchy. We're also facilitating discussions within our teams in Yemen and the Democratic Republic of Congo, which are among the countries where it is most challenging to deliver effective safeguarding.

We are committed to sharing our experiences with peers in the development sector and learning from others. In September 2019, for example, we shared our learnings on organisational culture change with directors from many iNGOs including Save the Children, Greenpeace, and ActionAid at the International Civil Society Centre. In October 2019, at the conference "Global Perspectives 2019 – Legitimacy and Impact in Times of Scrutiny", Oxfam participated in a plenary panel discussion on Legitimacy and Accountability, highlighting the importance of living our values internally if we are to be legitimate in demanding those values of others.