



**International Rescue Committee response to
International Development Committee's inquiry into:
'Sexual exploitation and abuse in the aid sector'.**

August 2020

Executive summary

1. The International Rescue Committee (IRC) welcomes the decision of the International Development Committee to hold an inquiry into sexual exploitation and abuse (SEA) in the aid sector.
2. Safeguarding is at the core of IRC's mission – to do no harm and ensure that the IRC's clients and staff are protected from sexual violence, exploitation, and abuse. IRC's goal is the strengthening and development of a global approach consistent with best practices that is appropriately and technically resourced, to build capacity, and institutionalise prevention and response in our daily work. We achieve this through dedicated staff and resourcing for safeguarding activities; robust organisational policies that are regularly reviewed and updated; expanded training programmes; strong, impartial and confidential mechanisms for reporting and investigations; programmatic innovations; and long-term behavioural and cultural change within the organisation.
3. Attention from media and donors after exploitation and abuse in the aid sector was revealed in 2018 led to improvement in the sector. However, progress has faltered. The continuing news reports of SEA in the aid sector highlights that change will be a long-term and complicated process. Investment has become inconsistent, cultural change has proven hard to achieve or tokenistic, and the toll of COVID-19 and its economic impacts may push safeguarding even further down the list of priorities.
4. Progress has been made on improving reporting mechanisms, including through the creation of best practice guidelines and dedicated projects funded by DFID. There is also a growing recognition within the sector that for SEA to be eradicated, reports must first go up as organisations get better at understanding the full extent of staff and client communities' experiences.
5. However, work on improving response mechanisms must not distract from activity to prevent SEA in the first place. NGOs and donors must now dedicate themselves to transformative culture change that starts to dismantle the power dynamics and imbalances that create a conducive environment for safeguarding violations. It requires a strategic, cross-organisational approach with collaboration between all actors involved in the delivering aid, including donors, NGOs, and the UN.
6. The biggest barrier to transformative change is funding. Unless NGOs and donors prioritise safeguarding through the allocation of funding, it will be challenging to make progress.
7. The UK government should be rightly proud of its reputation as a global leader on safeguarding. Dedicated funding from the Department for International Development (DFID), along with the department's public and private advocacy, has driven progress in the sector. The new Foreign, Commonwealth and Development Office (FCDO) must continue to prioritise the issue by retaining DFID's dedicated safeguarding unit, maintaining and increasing funding for safeguarding activities, and working with other major donors to establish shared standards and approaches to safeguarding.

Section 1: Support for victims and survivors

8. To ensure that incidents of SEA are captured and addressed, rigorous reporting mechanisms are vital. Reporting processes must be appropriate, safe, dignified, confidential and survivor-centred. The increased use of reporting mechanisms can also act as a longer-term deterrent for potential perpetrators by creating accountability and an environment of openness and communication.
9. The UK NGO sector, through Bond and including the IRC, have worked to establish best practice characteristics for reporting. In August 2019, Bond published “20 core elements: a toolkit to strengthen safeguarding report-handling”¹, funded by DFID. The toolkit outlines the principles that should underpin any reporting mechanism and a further 20 characteristics that “have been identified as core to any accessible and comprehensive safeguarding report-handling mechanism”.
10. Reporting channels should vary according to their operating context. They should consider the type of services operated, the population served, and socio-cultural context. Reporting requirements may differ within a single country or city programme and assessments must recognise these differences. Multiple options for reporting should be made available to ensure accessibility for those who wish to report, with adjustments made to ensure that clients of all genders, ages, languages, literacy-level, and abilities can access said mechanisms. Mechanisms must also be adapted for low or no technology contexts. Where services that focus on protection exist – such as those tackling gender-based violence or child protection services – it is possible that reporting can be encouraged through these services. Additional routes for reporting should be created, whether these services are operational or not, so people can make reports directly to the organisation.
11. The implementation of reporting mechanisms must be done in collaboration and coordination with the target population - for any reporting mechanism to be effective it must be trusted and understood by those it serves. Furthermore, reporting mechanisms must be consistently monitored to ensure that they remain suitable and effective.
12. In some places there also exist joint or interagency complaint mechanisms in addition to methods for making reports directly to the organisation in question. These mechanisms have the potential to be impactful by harmonising standards and procedures across an entire NGO community operating in a particular geographical context. They can also support smaller organisations who do not have the resources to create their own robust reporting mechanisms.
13. The IRC is actively engaging across our global programmes to enhance existing client feedback and reporting mechanisms. We are building on best practice and successes, such as our DFID-

1

https://www.bond.org.uk/sites/default/files/bond_20_core_elements_a_toolkit_to_strengthen_safeguarding.pdf

funded Client Feedback and Response Mechanism (FARM) project in Syria. Launched in 2017, FARM allows clients, community members and stakeholders to lodge a complaint, request information or help, and provide feedback or suggestions to IRC. This project allowed us to become more responsive to the people we serve, and we have subsequently applied the developed processes throughout our MENA-based programmes. The success of FARM demonstrates the powerfully impactful changes that can be achieved if proper resources are allocated to safeguarding activities.

14. It is also important to support survivors as they come forward. The IRC is building contextualised response plans for all the locations in which we operate, with the aim of making appropriate survivor-centred support services, including psychological and legal support, available to survivors (regardless of whether they choose to submit a formal report). For staff, the IRC has a well-established global Duty of Care programme with internal and external resources designed to respond to a cross-section of staff care matters, including psychological wellbeing.
15. The IRC has taken significant steps to make all staff aware of safeguarding policies, including reporting mechanisms, and their individual obligations through internal training and campaigns. In 2018, the IRC launched the “Raising Concerns” campaign, through which all staff and offices² received information cards and posters, translated into 21 languages, outlining how they can report safeguarding violations by staff towards other staff members or clients. Since this campaign, we have seen a greater number of people come forward with reports, representing an increase in trust towards and awareness of the IRC’s policies and processes. However, it is also clear that hierarchies and privilege play a role in who comes forward, with the majority of reports still coming from staff-related concerns rather than from beneficiaries.
16. In April 2020, the IRC issued updated guidelines for investigating safeguarding breaches. Investigations are carried out by a centralised ‘Ethics and Compliance Unit’ (ECU) who operate independently of IRC teams. An important part of the ECU’s work is to ensure that the organisation maintains effective policies, procedures, controls, processes, and systems to prevent, detect, and investigate potential violations of internal policies, law or regulation or material failures.
17. An effective reporting mechanism can provide organisations with opportunities for learning and improvement. Whilst in the past reporting was seen as solely an issue for compliance, organisations are now seeing the potential to use reporting data to deepen their understanding of the issues faced in programmes and operational systems, and at the same time highlight areas of good and bad practice. It is a concrete opportunity to build trust with the communities we serve, and to demonstrate our commitment to them, a commitment deeper than just providing access to aid services. This is a long-term goal that we are striving towards in the IRC.
18. There must also be a willingness for organisations to highlight areas where they are continually working to improve. The focus, at least initially, should not be on arbitrary targets to reduce

² The IRC has over 14,000 employees and over 200 offices worldwide

reports. For SEA to be eradicated, reports must first go up as organisations get better at understanding the full extent of staff and client communities' experiences.

19. However, putting in place reporting mechanisms can only ever be part of the solution. The IRC understands that reports only tell part of the picture and represent only the most extreme tip of the issue. The Gender & Development Network (GADN) found in their report "Safeguarding and Beyond: One Year On" that systems for reporting are "still reliant on both catastrophic incidents and on individual survivors reporting"³. This produces a partial response to the challenges of SEA in the aid sector. The focus on reporting, and specifically the numbers of reports, has distracted organisations from tackling the trickier task of preventing safeguarding violations in the first place, and bringing about organisational and cultural change. For this reason, the IRC is focussed on not only responding to safeguarding violations when they occur but also on institutionalising prevention and response in our daily work.

Section 2: Speaking up

20. We would define a whistle-blower as someone who reports on an illegal act or an act that violates IRC's code of conduct. This is a specific term that is distinct from someone who reports an incident they have experienced or witnessed. Whilst a reporter may not necessarily meet the definition of whistle-blower, the IRC extends the same level of organisational protection to them both, staff and beneficiaries alike.
21. It is vital that both survivors and whistle-blowers are protected and feel supported and empowered to make reports. Entrenched power imbalances and hierarchies, whether between the client and the aid worker or between aid workers themselves, mean that reporting is a potentially dangerous and difficult process. If a robust process for protecting whistle-blowers is not in place, in coming forward they risk their career and their place in the organisation. Equally for populations who receive aid, those making reports risk retaliation through loss of access to aid, services, programmes. It must be recognised however that even the most robust processes will not override local cultural norms, stigma, and victim-blaming attitudes that may also create an environment where survivors cannot come forward without social consequences or threats to their safety, including potentially being killed.
22. Organisations must create an environment that protects the confidentiality and safety of the person reporting, with the needs and wishes of the survivor at the core. We must apply the same survivor-centred standards that we apply as best practices in gender-based violence programming - empowering the survivor to make the best choices for them, whether this relates to accessing support services or seeking accountability.
23. One approach to protect those who need to come forward, within the context of entrenched power imbalances, is the principle of 'safe spaces'. These are spaces where survivors can make reports and discuss incidents in safety and without fear of retribution. Safe spaces may be physical, taking place in-person where the survivor lives, or they may be virtual if confidentiality

³ <https://gadnetwork.org/gadn-resources/safeguarding-and-beyond-one-year-on>

is impossible to maintain in the survivor's environment. These spaces also recognise the non-linear nature of reporting, as they allow survivors to build the confidence to make an official report. Survivors should be afforded the utmost confidentiality and their reports should always be treated as credible.

24. For example, the IRC has applied the principle of safe spaces in the 'Every Adolescent Girl Empowered and Resilient' (EAGER) project. EAGER, funded by DFID, is an IRC-led consortium project operating in Sierra Leone, targeting out-of-school adolescent girls aged 13 – 17. The project has created safe, trusted, and accessible spaces that provide girls with opportunities to access SEA prevention programmes, face to face reporting, and supportive psychological first aid with linkages to response services. In these spaces, girls meet with fully trained female mentors who provide life skills sessions on topics such as gender equality, GBV, and sexual and reproductive health, using stories to speak to girls' current experiences and potential risks. Girls are also reminded that they should not be harmed by anyone on the project and that they can talk to mentors privately, call the free client-response phone line for support, and/or call the Government's free gender-based violence helpline.
25. The IRC has multiple layers of reporting mechanisms designed to support both staff and clients coming forward and to protect them once they do. This starts with reporting mechanisms designed with clients to meet their diverse and intersecting needs, with the intention of building confidence and trust. Reports made by clients and staff are escalated to the IRC's centralised Ethics and Compliance Unit through multiple communication options that allow for reports anonymously and in multiple languages, where they are then triaged for investigation. These options include reporting to a supervisor or HR representative in person, directly emailing the ECU, or reporting via the IRC's Ethics Hotline. The hotline is an independent vendor that confidentially receives issues either by web form or phone at no cost, 24 hours a day, 7 days a week. Furthermore, the IRC has an anti-retaliation policy that prohibits retaliation and outlines protocols for disciplinary action if retaliation is confirmed. It also outlines how individuals can escalate their case directly to the Senior Director of Investigations.

Section 3: Culture change

26. The IRC's experience resonates with the findings of a GADN report that public shaming and reputational risk acted as "powerful motivators" in the aftermath of the 2018 revelations of exploitation and abuse in the aid sector. However, the report argues that the change has been more operational than transformative. Changes have focussed on tightening reporting mechanisms and on policy development rather than addressing the structural power imbalances and permissive culture embedded in the NGO sector.
27. Culture change is notoriously difficult and abstract. It must consist of many actions that work in conjunction. Structural constraints, such as the way in which aid is spent and the wide range of actors operating in the sector, holds back transformative change in safeguarding. Robust, long-term change requires collaboration and cooperation between a wide range of different actors, including all donors, the UN, NGOs, and other organisations. Aid spending and programming

should be as transparent as possible and financial resourcing should be increased to meet the ambition and need.

28. Culture change must also start to dismantle the power dynamics and imbalances that create a conducive environment for safeguarding violations. It requires a strategic, cross-organisational approach. These organisational change efforts to combat exploitation and abuse sit alongside, and must be coherent with, efforts to address other forms of inequality and exclusion. There are strong intersections across these issues and change efforts must be planned and executed in a mutually reinforcing way. Otherwise, they will not achieve their full objectives, and will not successfully change negative power dynamics which perpetuate inequality and exclusion.
29. At the IRC, we believe that culture change begins with behavioural change. Our long-term strategic goal has been to strengthen and develop a global approach to behavioural change that is informed by up-to-date best practice and is appropriately and technically resourced to build capacity and institutionalise prevention and response in our daily work. We have made progress on this goal through the creation of a new, comprehensive strategy accompanied by improved policies, expanded training, programmatic innovations, and additional resourcing.
30. Previously, safeguarding activities at the IRC had been largely related to specific grants and led by technical staff who were also focused on our programmatic activities, such as protection and gender-based violence. This was complemented by a limited headquarters capacity focused on preventing SEA. This was not sufficient for institutional, transformative change. The IRC's Safeguarding Strategy, launched in 2019, prioritises "building a safeguarding culture that ensures the safety, dignity, and protection of clients receiving aid". With this strategy, developed through extensive cross-organisation coordination and collaboration, the IRC has affirmed a global organisational commitment to strengthen safeguarding prevention and response.
31. This work began with establishing the building blocks of a sustainable approach to safeguarding, such as reviewing and updating existing policies. The IRC has clear policies in place on *Harassment-Free Workplace, Adult Safeguarding, Combating Trafficking in Persons, Child Safeguarding, Global Reporting Guidelines, Anti-Retaliation and Reporter Protection Policy*. All these policies were reviewed in 2019 and are regularly reviewed and updated as appropriate, consistent with sector good practices and standards.
32. We have robust procedures for hiring new staff with reference and background checks specific for each role and each context. Wherever possible, our checks for field staff hire include a combination of 2 to 5 past employer references, an education verification, an Anti-Terrorism and Corruption check, a criminal record check, a sex offender registry check, a driving record check, and a credit check. Prospective employees also have to acknowledge receipt of and read through key IRC policies including the IRC Way (Code of Conduct). Throughout an employee's career at IRC, they are required to undergo compulsory training on the Code of Conduct each year. Additional trainings specifically on different aspects of safeguarding have been developed and it is intended that they will be expanded to the Board of Directors in 2021.

33. Effective communication is key to properly implementing policies and outlining acceptable behaviour. To improve the flow of communication, each local office has appointed two safeguarding leads who support the roll-out of safeguarding activities, assist in the communication of policies, and feed into management discussions. These staff assume their responsibilities alongside, and as part of, their regular duties. They have been supported with dedicated training and through a peer-to-peer support scheme. In specific locations, such as Sierra Leone, Tanzania, and Pakistan, with financial support from DFID, we have created dedicated in-country safeguarding-focused positions. The initial results have shown tremendous growth in our clients' trust in the IRC, improved communications, and piloting of new ideas on how to prevent safeguarding violations. For example, in our programmes in Tanzania we have seen increased engagement with clients, which has included the production of client-led communication materials, as well as with locally recruited staff.
34. To improve our ability to provide appropriate, culturally specific, and survivor-centred response and support services, we developed a Global Handling Framework for Preventing and Responding to Safeguarding Violations Experienced by IRC clients. This document sets out minimum standards for preventing and responding to safeguarding violations. The Framework is used by all our country programmes and resettlement offices to develop their own Standard Operating Procedures (SOP), adapted to their operating environment. This ensures that processes and procedures are robust, consistent, and informed by global best practice.
35. The biggest barrier to transformative cultural change is funding. Following the increased attention towards safeguarding in 2018, additional standards and expectations were put on aid organisations. However, the financial and human resources that organisations and donors dedicated were not commensurate with these expectations. When safeguarding is an adjunct to the day-to-day responsibilities of an employee, the outcomes of their safeguarding work will inevitably be limited. Unless NGOs and donors prioritise safeguarding through the allocation of funding, it will be challenging to make progress.
36. The IRC has made steps to better resource its approach to safeguarding, although further progress is still needed. In 2019, a Director of Safeguarding was hired to expand the existing safeguarding work and to spearhead the development and implementation of a multi-year strategy and action plan. This year, a full-time Safeguarding Adviser was recruited to the HQ team to provide technical advice and support to our Africa country programmes. Two additional staff will be added to the unit in late 2020.
37. The IRC recognises that we must go further. For any organisation to achieve transformational culture change, strategies and policies must be accompanied with commensurate human resources and capacity. Whilst NGOs must shoulder responsibility for improving safeguarding performance, donors should also play a role in supporting this expansion of human and financial resources to do safeguarding well. Safeguarding is as essential to good programming as financial control and should be funded with the same attention that other aspects of good programming have benefited from in recent years.

Section 4: New department

38. The UK is a leader on safeguarding issues and the Department for International Development has been instrumental in driving improvements in the area. This is achieved by a mixture of stringent reporting requirements, production of best practice, and importantly, funding and human resources. Were the Foreign, Commonwealth and Development Office to step back from this leadership position, the reputation of UK aid would suffer a severe reputational hit and decrease the UK's influence on the global development stage.
39. A specific example of how DFID has driven culture change can be seen in Sierra Leone. The IRC hired dedicated safeguarding staff using funding from DFID. This led to huge progress in the standard of safeguarding in the IRC's Sierra Leone programming. Since November 2019, IRC Sierra Leone has: established a new complaints response mechanism and trained staff on its processes; lead a comprehensive safeguarding action plan for the DFID funded EAGER adolescent girls project; worked with HR and supply chain to ensure HR and procurement processes incorporated safeguarding measures; provided structured and ongoing safeguarding support to partner organisations; contributed to national fora and safeguarding action plans, including developing a safeguarding policy for the COVID-19 Community Care Centres (CCC), the first time a Sierra Leone Government facility will have a safeguarding policy. This clearly demonstrates how dedicated funding for safeguarding leads can accelerate progress for both individual NGOs and the wider community in which they operate.
40. The IRC's work in Sierra Leone has also benefited from support from the DFID in-country team. Not only did the two major consortia projects IRC is involved with include a dedicated safeguarding budget but the in-country team also held workshops to bring together aid actors to share learning. This has created opportunities for organisations to collaborate and develop shared practices and has kept a focus on the issue of safeguarding.
41. UK aid funding has financed the development and dissemination of best practice guidance and toolkits. DFID funded Bond's "20 Core Elements" and an online open-access Safeguarding Resource and Support Hub to support organisations in the aid sector to strengthen their safeguarding policy and practice. There is an opportunity for the FCDO to deepen and expand upon the work on culture change in the sector, internally and in collaboration with other global donors.
42. DFID has a fourteen person Safeguarding Unit who work full time to "strengthen oversight and management systems and build capability". They work with external partners as well as colleagues in DFID and other Government departments. **It is vital that this unit is retained in the new Foreign Commonwealth and Development Office and empowered and resourced to do even more, including overseeing safeguarding for all aid spent by the UK Government.**
43. The NGO sector must take responsibility to properly resource its safeguarding responsibilities. However, it is also clear that additional government funding can be a powerful driver of change. **To retain its reputation as a global leader on safeguarding, the FCDO must continue to**

resource safeguarding efforts accordingly either through specific safeguarding budget lines within projects or by enabling NGOs to budget this within overheads to ensure a robust approach to safeguarding.

44. The FCDO must also invest in supporting smaller, local or female-led NGOs and civil society organisations (CSOs) who do not have the unrestricted funds necessary to build rigorous safeguarding structures, in line with its commitments to the Grand Bargain and localisation.

45. The new department should work with other major donors to establish shared standards and approaches to safeguarding. This should cover proper reporting mechanisms, dedicated safeguarding leads on projects and mandatory training. FCDO leadership is essential for continued attention on safeguarding.

Safeguarding and COVID-19

- COVID-19, like other disease outbreaks, exacerbates the risk of safeguarding violations, including sexual abuse and exploitation (SEA) and child abuse and exploitation at the hands of humanitarian workers and response staff.
- An increase in persons responding to the crisis, higher demand for reduced health supplies, restrictions on resources for basic needs, and the socio-economic consequences of an outbreak all increase the risks of safeguarding violations. Women and children are the population groups most at risk of safeguarding violations.
- Significant effort should be made to prioritise and strengthen safeguarding practices and ensure that despite the additional strains of responding to the pandemic standards do not slip.
- Attention should be paid to the following areas:
 - Prevention: background checks and rigorous vetting of new partners; additional training on safeguarding policies and reporting mechanisms to existing and new staff; continued and enhanced monitoring visits to vendors and suppliers.
 - Reporting: adjust existing or develop new remote safeguarding mechanisms; add accessibility and availability of technology for at-risk groups; maintain as much as possible networks to allow community-based reporting.
 - Response: Map available response services and make list of services that are closed or suspended or amended; maintain protection programming to ensure access to response services for survivors of SEA.

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