Written evidence submitted by Chemonics International, 19 August 2020

Introduction to Chemonics International

1) Chemonics International, founded in 1975, is an employee-owned development consultancy implementing programmes in more than 83 countries. Chemonics' global workforce comprises 5,500 specialists, 90 per cent of whom originate in programme countries, working in 10 technical disciplines. We currently implement programmes in technical areas including gender equality and social inclusion, conflict and governance, health, agriculture, and food security. We deliver UK aid programming in multiple countries in Africa, Asia, and the Middle East. We are also the largest supplier to the U.S. Agency for International Development (USAID). Our worldwide presence provides practical examples of how the private sector is responding to challenges of sexual exploitation and abuse in the aid sector.

Summary

- Since 2018, the international development community has taken steps to prevent, detect, and report sexual exploitation and abuse.

- Progress has been made in improving standards and policies at both the organisational and project levels.

- The focus must now shift to sector-wide accountability mechanisms that go beyond individual organisations and projects to ensure consistent implementation and lasting change.

- Stronger data on how current efforts are impacting incidences of sexual exploitation, abuse, and harassment is needed. This will improve understanding of what is working, what is not, and how to better adapt.

- The new Foreign, Commonwealth and Development Office (FCDO) is in a unique position to provide cross-HMG coordination and international leadership in this area.

- FCDO's role should involve working closely with national governments to raise the profile of safeguarding on their agendas.

- Only with a three-pronged approach, and with the development sector, donors, and national governments working together, can this abuse end once and for all.

Key Recommendations

2) The Department for International Development (DFID) has made significant progress toward building a culture and developing policies to prevent, detect, and report sexual exploitation and abuse in the aid sector. Further work is needed to understand, through data collection, how the policies have impacted the aid sector, and to subsequently adapt our approach to be more effective (see paragraphs 8 and 17).

3) FCDO has a unique opportunity to provide cross-HMG coordination and leadership on preventing and reporting sexual exploitation, abuse and harassment (SEAH) in the aid sector. FCDO should provide clearly aligned standards and requirements in this area for all UK Official Development Assistance (ODA) funded programmes (see paragraph 21).

4) The required changes in culture and behaviour will be more easily attained if they are coordinated and monitored by all stakeholders, rather than relying on the actions of individual organisations. FCDO should provide adequate resources to key coordinating bodies to effect culture change by ensuring robust and consistent safeguarding practices on the ground and embedding stronger accountability mechanisms (see paragraph 12).

5) Project-level focus on safeguarding should be strongly complemented with messaging from national governments and community structures, particularly to combat the stigma affecting victims and whistleblowers. FCDO should seek opportunities to influence national governments in this area and strengthen their safeguarding measures (see paragraph 10).

6) FCDO should continue DFID's work in encouraging organisations to share SEAH tools and resources at a centralised site, such as through the Safeguarding Resource and Support Hub (see paragraph 16).

7) For ODA-funded projects valued at more than £10 million, an additional requirement to develop a project-specific safeguarding policy and approach should be considered. This will ensure that all staff are aware of project-specific safeguarding concerns and any requirements particular to the given activities or operating environment (see paragraph 20).

Speaking Up

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?

8) Since 2018, the development community has worked to improve global standards and implement policies to enable reporting and speaking out against sexual exploitation, abuse, and harassment in the aid sector. DFID and FCO have played a pivotal role in setting those standards and shaping policies, both internally and with their implementing partners. Chemonics has established stringent policies and mechanisms to enable victims and witnesses to speak out. There are several ways to report these (including anonymous reporting options) and ensure protection against retaliation. Chemonics has complemented these mechanisms with training for all global staff, programme counterparts, and beneficiaries on unacceptable behaviour and how to report concerns. In instances where downstream partners lack policies and procedures to enable reporting and speaking out, Chemonics can provide technical assistance to develop and implement them.

9) According to DFID's latest Annual Report and Accounts for 2019-20, there was an increase in the number of internal SEAH cases reported, up from five in 2018-19 to 26 this year, and an increase in safeguarding concerns being reported by DFID's implementing partners, from 73 in 2017-18 to 260 in 2018-19 and 452 in 2019-20. This indicates that measures being taken by individual organisations are enabling reporting and speaking up. What is less clear is whether these measures are enough or whether many violations remain unreported. Unravelling this requires more analysis to understand which policies and procedures are supporting this empowerment, which are not working, and how they can be further improved.

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

10) Whilst Chemonics has strong non-retaliation policies in place for all employees globally, due to differing local laws it cannot be guaranteed that whistleblowers in beneficiary communities are protected from retaliation. For example, in Kinshasa, DRC, where Chemonics' ACCELERE!1 education project (jointly funded by DFID and USAID) is located, staff confirmed that while local police have the obligation to protect whistleblowers, there is still local stigma against reporting SEAH incidences due to fear of retaliation. To challenge this

norm, Chemonics trained project staff, key government officials, and project beneficiaries on preventing and combating sexual and gender-based violence in the workplace and in schools. Stronger national government engagement is needed to raise awareness of the importance of reporting, as well as protection of victims and whistleblowers.

Culture Change

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

11) Since 2018, development actors have taken action at the sectoral, organisational, and project levels to change workplace culture.

12) At the sector level, private development actors are collaborating to ensure coordination and the sharing of best practices. For example, Chemonics is a member of the leadership of the Safeguarding Leads Network co-organised by British Expertise International and DFID. The network comprises twenty-three private sector suppliers in the UK who share and integrate experiences, lessons, and best practices to improve safeguarding in development aid globally. Chemonics is also a member of the Council of International Development Companies (CIDC), which is based in the US and has more than 400 members. Chemonics led development of "Guiding Principles on Preventing Harassment, Exploitation and Abuse by International Development Companies", signed by 37 CIDC members in 2018. Signatories pledged to independently and collectively go beyond a compliance-driven approach to meeting regulations and take additional steps to strengthen protection mechanisms for SEAH-affected populations. Sector-led change is critical to success, ensuring that individual organisations, often competing for the same funds, propel each other to change.

13) At the organisation level, Chemonics has taken several actions since 2018 to enhance workplace norms that prevent and respond effectively to SEAH. Chemonics established an employee-led taskforce in 2018: the *Sexual Harassment, Exploitation, and Abuse Working Group*. The remit of this group is to evolve our policies, procedures and systems to prevent, detect, and respond to SEAH cases with an emphasis on a survivor-centred approach. Since 2018, the group has created a focused SEAH employee resources web platform, updated policy manuals and training curricula, created new mandatory training on harassment for all staff, and supported the continued delivery of bystander training. The taskforce continues today, working closely with Chemonics executives as well as our Office of Business Conduct, Gender Equality and Social inclusion Practice, Human Resources, and other teams to ensure employee oversight. Visible engagement and articulated commitments at the executive level are a critical enabling factor for culture change; it not only identifies organisational priorities for internal management, but also holds counterpart industry actors accountable for sustaining progress and momentum on safeguarding.

14) *Training and communication with staff to reinforce anti-harassment culture.* In 2019, Chemonics launched mandatory employee training on "Identifying Sexual Harassment: Maintaining a Respectful Workplace", which achieved a 99.7 per cent completion rate across approximately 5,000 headquarters and country programme staff. The training is accessible in both high- and low-connectivity geographic areas and will be given annually to reinforce Chemonics' zero-tolerance approach to sexual harassment. In October 2019, Chemonics also hired a bystander intervention expert to deliver training of trainers who would, in turn, deliver in-person training to programme offices. We believe mandatory online training of this kind, combined with in-person training, which can be given across implementing countries and projects and repeated at regular intervals, is critical to supporting a workplace culture that does not tolerate SEAH.

15) *Countering discrimination and fostering an inclusive workplace culture.* SEAH is rooted in power imbalances shaped by gender expression, ethnicity, religious affiliation, physical and non-physical disabilities, sexual orientation, and age. Though institutional anti-discrimination policies are essential, they alone are not enough to tackle abuse that can arise from power imbalances. Since 2018, Chemonics' Diversity and Inclusion department has taken tangible actions to foster inclusive workplace norms that counteract risk of exploitation, harassment, and abuse. In addition to conducting training on topics like unconscious bias and microaggressions, the department emphasises a participatory approach to workplace inclusion and supports employee-led resource groups to improve work environments, particularly with staff who identify as members of the disability community, members of the LGBTQIA+ community, and veterans. In 2020, Chemonics also established a Standing Committee on Racial Equality to combat systemic racism and barriers to equitable representation in senior leadership. Taking person-centred actions in tandem with organisational policy revisions is essential to countering work cultures that enable unchecked abuse.

16) At the programme level, Chemonics has developed capacity building tools for local partners and beneficiaries to prevent, detect and address incidences of SEAH. In early 2019, Chemonics published the open-source [SHEA Prevention and Response Program Toolkit (PRP)](#) that provides step-by-step guides for project staff to lead trauma-informed bystander and SEAH prevention training and establish legally compliant response systems. Our online resource has been accessed by 600 unique parties and further amplified through 15 news outlets based in South Asia, Eastern and Western Europe, and the UK, indicating that open-source tools in this area are attracting interest and engagement. The toolkit is designed to be easily contextualised to each project and is intended for any actor looking to address SEAH in its activities, such as aid organisations, government ministries, local public entities, civil social organisations, and private sector enterprises. In 2019, Chemonics piloted the toolkit in two unique contexts: the USAID Human Rights Activity in Colombia with the Ombudsman's Office of Colombia; and the USAID Myanmar Promoting Rule of Law Project with three local civil society organisations. Results from the pilots confirmed that the toolkit is practically designed and adaptable to each operating context and showed promise for further expansion. The toolkit will continually be updated with the latest information on SEAH prevention, such as a new COVID-19 addendum currently in development. Equipping our local government and CSO partners with practical SEAH prevention tools at the programmatic level will contribute to cultures of anti-harassment beyond Chemonics' internal practices.

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

17) One challenge that pertains not only to culture change, but to the sector's understanding of SEAH overall, is the availability of consistent and usable data on SEAH cases. As [K4D's evidence brief on SEAH reporting](#) notes, data collection and public reporting are vastly inconsistent across NGOs and development actors, which makes it difficult to accurately evaluate the prevalence of different kinds of SEAH perpetrated or experienced by aid workers, beneficiaries, intermediaries, volunteers, and other actors. While development actors are open to publishing SEAH data to varying degrees, a move towards basic sector-wide expectations for disaggregated SEAH reporting that adhere to Do No Harm principles would enable organisations to work from a common understanding of evidence (incomplete though the data may be). Data collection and reporting of this nature is highly sensitive, and at times personally endangering. The seriousness of SEAH still warrants coordinated effort by development actors to build an evidence base that will enable SEAH prevention and response to become more targeted and nuanced. If successful, a common evidence base will also affect cultural change by enabling development actors to move from a narrative of 'bad apples' to addressing systemic gaps and failures that disrupt patterns of abuse, hold perpetrators to account, and respond to survivors' needs.

Accountability

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?

18) DFID holds all implementing partners accountable to safeguarding and risk prevention practices through its Supply Partner Code of Conduct, which maintains that supply partners must exercise social responsibility and transparency in all aspects of programmatic activity as well as when engaging with colleagues, beneficiaries, and other stakeholders. Implementing partners must have their own organisational safeguarding procedures in place to reflect the values and specific requirements outlined in the DFID Supply Partner Code of Conduct, and expressly prohibit acts of misconduct and discrimination, including harassment, exploitation, abuse, discrimination, and corruption. Any subsequent beneficiary or partner that the lead implementer engages must also be held to the same standards and vetted through a formal evaluation process.

19) Chemonics has its own Supplier Code of Conduct, which is regularly reviewed against DFID policies and procedures. Before entering a formal agreement with Chemonics, all downstream partners are required to fill out a detailed Selection Form and undergo a formalised due diligence process to indicate compliance with Chemonics' commitment to safeguarding and outline any internal mechanisms that exist to address risks to or violations against safeguarding. If a potential downstream partner does not pass Chemonics' due diligence assessment or does not meet the required level of safeguarding protections and policies at the evaluation stage, Chemonics works with the partner to address these shortfalls. Any gaps in capacity, whether with the lead implementing partner or downstream partner, must be disclosed to the client, along with any subsequent updates or developments that occur to address these gaps. ODA funding departments hold implementing partners accountable by reserving the right to reduce scores in a programme's annual review if these gaps are not addressed and, under extreme circumstances, suspend programme activity.

20) ODA funded programmes valued at £10 million and more should be required to develop a comprehensive safeguarding manual, taking into account any risks associated with specific programmatic activities in addition to the political, economic, and geographic context within which those activities are conducted. This will ensure that staff are aware of potential risks or violations to safeguarding, as well as best practices and procedures designed to mitigate risk. The project safeguarding guide should also serve as a training mechanism during staff induction and be disseminated widely to all project members.

21) FCDO should maintain DFID's strong safeguarding requirements for lead implementing agencies as well as for downstream partners. These requirements have made it clear that responsibility for compliance rests with individual implementing agencies (and ultimately with the lead organisation), and the strong ramifications for noncompliance. FCDO has a unique opportunity to provide cross-HMG coordination and leadership in this area, particularly where other government departments fall short of DFID requirements. FCDO should provide clearly aligned standards in this area for all ODA funded programmes.