Independent Commission for Aid Impact

The UK's approach to safeguarding in the humanitarian sector

A review

February 2022

The Independent Commission for Aid Impact works to improve the quality of UK development assistance through robust, independent scrutiny. We provide assurance to the UK taxpayer by conducting independent reviews of the effectiveness and value for money of UK aid.

We operate independently of government, reporting to Parliament, and our mandate covers all UK official development assistance.

Overall review scores and what they mean

GREEN — Strong achievement across the board. Stands out as an area of good practice where UK aid is making a significant positive contribution.	**AMBER/ RED** — Unsatisfactory achievement in most areas, with some positive elements. An area where improvements are required for UK aid to make a positive contribution.
GREEN/ AMBER — Satisfactory achievement in most areas, but partial achievement in others. An area where UK aid is making a positive contribution, but could do more.	**RED** — Poor achievement across most areas, with urgent remedial action required in some. An area where UK aid is failing to make a positive contribution.

OGL

© Crown copyright 2022

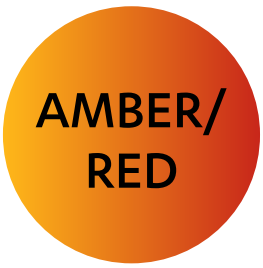
This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit www.nationalarchives.gov.uk/doc/open-government-licence/version/3, or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: psi@nationalarchives.gsi.gov.uk.

Where we have identified any third party copyright you will need to obtain permission from the copyright holders concerned.

Readers are encouraged to reproduce material from ICAI reports, as long as they are not being sold commercially, under the terms of the Open Government Licence. ICAI requests due acknowledgement and a copy of the publication. For online use, we ask readers to link to the original resource on the ICAI website.

Any enquiries regarding this publication should be sent to us at enquiries@icai.independent.gov.uk.

@ICAI_UK icai.independent.gov.uk



The UK government has increased international attention to protection from sexual exploitation and abuse (PSEA) in the humanitarian sector but should reinforce systems for consultation with affected people, especially victims and survivors of sexual exploitation and abuse (SEA), so their views are consistently used to learn 'what works' and inform prevention of and response to SEA.

In the wake of high-profile safeguarding incidents that emerged in 2018, the UK government has increased attention to the issue internationally and has added impetus to efforts to tackle sexual exploitation and abuse (SEA) by humanitarian workers at local levels. The UK's strategy is wide-ranging and rightly acknowledges that reducing SEA in international aid will take long-term, sustained efforts. However, the approaches adopted by the Foreign, Commonwealth and Development Office (FCDO) place particular emphasis on accountability towards the department itself, putting accountability towards affected people, particularly victims and survivors, at risk of being deprioritised. This, and the need to reinforce systems for routinely consulting with, and learning from, affected people, are important weaknesses that need to be addressed.

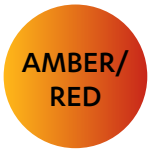
Since hosting the 2018 international safeguarding summit, the UK has become a key actor whose investments and leadership have been instrumental in strengthening coordination on PSEA. FCDO is working collaboratively with a range of partners to increase coherence within the humanitarian sector and to drive up standards. There is, however, a need to solicit the voices of victims and survivors more actively, both in high-level forums and on a day-to-day basis in humanitarian response operations, and to strengthen information sharing and reporting on SEA.

FCDO has made extensive efforts to reinforce minimum standards both within the department and for its implementing partners. This has contributed to increased awareness and a focus on improved staff conduct. However, insufficient funding for partners' core costs, particularly for smaller organisations, can limit their ability to establish systems for prevention and response. Significant under-reporting of SEA incidents, particularly among affected populations, continues to be a challenge despite increased efforts to encourage reporting. FCDO has made significant investments in systems for investigating reported safeguarding cases. However, we found that their own investigations case management system was not calibrated to prioritise reports of SEA perpetrated against affected populations and that there were gaps in FCDO's internal guidance, including on protecting whistleblowers and on ensuring due process and protection of the rights of the accused. FCDO's support to employee screening schemes that aim to prevent perpetrators from being given the opportunity to reoffend has not yet been fully realised. Neither have the department's aims to ensure that victims and survivors consistently receive survivor-centred responses and adequate support. Many of the measures are at an early stage of implementation and there is as yet limited evidence to show that the measures taken have reduced the risk of SEA for people affected by humanitarian responses.

Individual question scores

Question 1

Relevance: How well has the UK government gone about building a relevant and credible portfolio of safeguarding programmes and influencing activities?

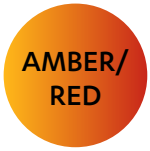


Question 2

Coherence: How well does the UK work with other donors and multilateral partners to ensure a joined-up global approach to protection from sexual exploitation and abuse?

Question 3

Effectiveness: How effective is the UK's approach to protection from sexual exploitation and abuse at programme, delivery partner and sector-wide levels?



Contents

Acronyms and glossary i

Executive summary iii

1. Introduction 1

2. Methodology 5

3. Background 8

4. Findings 15

5. Conclusions and recommendations 32

Annex 1: Methodology for engagement with affected populations 35

Acronyms and glossary

Acronyms	
ACRO	ACRO Criminal Records Office
AAP	Accountability to affected populations
CATI	Computer-Assisted Telephone Interview
CHASE	FCDO Conflict, Humanitarian and Security Department
CHS	Core Humanitarian Standard on Quality and Accountability
CSO	Civil society organisations
CSSG	Cross-Sector Safeguarding Steering Group
DFID	Department for International Development (merged with the Foreign and Commonwealth Office in September 2020)
DRC	Democratic Republic of the Congo
FCDO	Foreign, Commonwealth and Development Office
FCO	Foreign and Commonwealth Office (merged with the Department for International Development in September 2020)
FRRM	Feedback, Referral and Resolution Mechanism
GBV	Gender-based violence
IASC	Inter-Agency Standing Committee
IDC	International Development Committee
IDP	Internally displaced person
LGBTIQ+	Lesbian, Gay, Bisexual, Trans, Intersex, Queer plus (all other gender and sexual orientations)
MDS	Misconduct Disclosure Scheme
NGO	Non-governmental organisation
OCHA	United Nations Office for the Coordination of Humanitarian Affairs
ODA	Official development assistance
OECD DAC	Organisation for Economic Co-operation and Development's Development Assistance Committee
PSEA	Protection from sexual exploitation and abuse
RSH	Resource and Support Hub
SCHR	Steering Committee for Humanitarian Response
SDG	Sustainable Development Goal
SEA	Sexual exploitation and abuse
SEAH	Sexual exploitation, abuse and harassment
SIT	Safeguarding Investigations Team
UNHCR	The United Nations High Commissioner for Refugees, the UN Refugee Agency
WHO	World Health Organisation

Glossary of key terms	
Accountability to affected populations	Accountability to affected populations (AAP) is an active commitment by humanitarian actors to use power responsibly by taking account of, giving account to, and being held to account by the people they seek to assist.
Do no harm	The principle of 'do no harm' applies to all development and humanitarian organisations. It requires them to strive to minimise the harm they may inadvertently cause through providing aid, as well as harm that may be caused by not providing aid.
Downstream partner	Any person, organisation, company or other third-party representative contracted throughout the humanitarian aid delivery chain (see below).
Humanitarian aid delivery chain	In humanitarian relief operations, logistics and supply chain management are a critical component to ensure that goods and services reach affected people. Challenging environments require the engagement of various stakeholders such as governments, the military, civil society, private companies, and international and national relief organisations, which all form part of the delivery chain for humanitarian aid.
Humanitarian assistance	Humanitarian assistance is intended to save lives, alleviate suffering and maintain human dignity during and after man-made crises and disasters caused by natural hazards, as well as to prevent and strengthen preparedness for when such situations occur. Humanitarian assistance should be governed by the key humanitarian principles of humanity, impartiality, neutrality and independence.
Localisation	Localisation is a process of recognising and delegating leadership and decision-making to national actors in humanitarian action.
Pooled funds	Pooled funds, contributed to by multiple donors, are used to finance joint interventions that are managed by humanitarian agencies which deliver programmes on behalf of the contributing donors.
Refugee Convention	The 1951 Convention relating to the Status of Refugees and Stateless Persons (commonly known as the Refugee Convention) is the main international treaty concerning refugee protection. The United Nations High Commissioner for Refugees serves as the 'guardian' of the 1951 Convention and its 1967 Protocol.
Survivor-centred approach	Ensuring that prevention of, and response to, SEA are non-discriminatory and respect and prioritise the rights, needs and wishes of survivors, including groups that are particularly at risk or may be specifically targeted for sexual exploitation, abuse and harassment.
Whistleblowing	Whistleblowing is the process whereby an employee or other stakeholder raises a concern about SEA or a risk of harm to other employees, aid workers, those intended to benefit from aid, or the wider community.

Executive summary

The sexual exploitation and abuse (SEA) by humanitarian workers of people they have a duty to support is a persistent problem in the humanitarian sector. Lack of robust data means that the scale and scope of the problem is unknown. Despite reforms dating back to 2002, prompted by a 'sex-for-aid' scandal in West Africa, SEA is still believed to be widespread in the sector.

This review examines the extent to which the UK government's safeguarding efforts have been effective in preventing and responding to SEA in humanitarian aid contexts. It considers programming, policy and influencing activities by the UK government between 2017 and 2021, the years straddling the October 2018 international safeguarding summit hosted by the UK (known as the 'London summit') where the UK and other key actors made significant commitments to sectoral reform. The review looks at whether the UK government has built a relevant and credible portfolio of safeguarding programmes and influencing activities, and assesses the extent to which the portfolio is having an impact on the problems it seeks to address. It also assesses how well the UK works with others to promote a joined-up global approach to addressing the challenges of preventing, detecting and responding to SEA.

Relevance: How well has the UK government gone about building a relevant and credible portfolio of safeguarding programmes and influencing activities?

The UK-hosted 2018 London summit played an important role as a catalyst for change, focusing international attention in the humanitarian sector on addressing SEA and adding impetus to efforts at local levels. The UK's strategy, developed in 2020, is wide-ranging, setting out four 'strategic shifts' that reflect a broad consensus on priorities in the humanitarian sector: to ensure support for survivors, victims and whistleblowers, to incentivise cultural change, to adopt global standards, and to strengthen organisational capacity and capability across the humanitarian sector to meet these standards. The strategy appropriately includes a mix of short-term and long-term measures, acknowledging that addressing SEA in international aid will take sustained efforts over time.

The UK's safeguarding strategy was developed based on wide consultation but would benefit from reinforced systems for ensuring that consultation with crisis-affected people, especially victims and survivors of SEA, informs both policy and prevention and response efforts. The London summit was preceded by a 'listening exercise', but more than three years on, a planned follow-up to this has not yet taken place. At country level, there are limitations to donors' ability to engage directly with people at risk of SEA and, like other donors, the Foreign, Commonwealth and Development Office (FCDO) relies largely on implementing partners to relay information from their consultations with affected people. Efforts should be reinforced to ensure that such information is continuously solicited, analysed and shared by FCDO to improve their partners' programming, and their own strategy and approach.

The UK's strategy of seeking change at both the international level of the humanitarian system and at the delivery level in country is relevant, but the balance between the two is overly skewed towards the former. The UK has made substantial investments to improve protection from sexual exploitation and abuse (PSEA) in the wider humanitarian system, supporting development of guidance and training, the establishment of international systems for information sharing on SEA, and sector-wide tools aiming to prevent perpetrators of SEA from being rehired by other humanitarian organisations and donor governments. International systemic change is both important and necessary, but it is a long-term endeavour. Both the magnitude of change and the extent to which it has become embedded in humanitarian response remain to be seen. There is a risk that FCDO's focus on the systemic level, coupled with its emphasis on partners' compliance with minimum standards, reinforces a top-down approach that may reduce the space for local-level initiatives that could deliver more contextualised results.

FCDO has invested substantially in the creation of a Safeguarding Investigations Team, which has a mandate to ensure a survivor-centred response to safeguarding incidents involving members of staff and recipients of FCDO funding. The department has made a significant effort to enable accountability when complaints

are made in UK-funded programmes. However, the design of the case management system made it difficult to identify cases of abuse against affected populations, limiting FCDO's ability to focus its attention on cases involving the most vulnerable. It is important to be able to identify these victims and survivors, as they are often those most at risk of all forms of abuse and least likely to have their voices heard. We note that FCDO took action to remedy this defect in response to the questions raised by our safeguarding investigations study.

The UK has invested in highly relevant measures to develop the humanitarian sector's capacity and capability, and to build an evidence base. However, a targeted strategy is needed to address serious and widely recognised evidence gaps on where, when and how SEA takes place in humanitarian settings, who is most at risk, and the short- and long-term effectiveness of current prevention and response measures.

The UK has got many things right in developing a wide-ranging strategy for safeguarding in the humanitarian sector based on extensive consultation with a broad range of stakeholders. However, the approaches adopted place particular emphasis on accountability from operational levels towards the international level, especially the donors, putting accountability towards affected people, particularly victims and survivors, at risk of being deprioritised. This, and the need to reinforce systems for routinely consulting with, and learning from, affected people, are important weaknesses that need to be addressed. We therefore award an **amber-red** score for relevance.

Coherence: How well does the UK work with other donors and multilateral partners to ensure a joined-up global approach to protection from sexual exploitation and abuse?

Since 2018, when the UK committed to stepping up action on SEA at the London summit, it has become one of the leading global actors on PSEA. While the UK's initial activities drew substantially on domestic safeguarding policies and practice, it quickly aligned its approach with established terminology and processes in the international humanitarian sector around PSEA. FCDO investments have been instrumental in strengthening coordination on PSEA, and the department is working collaboratively with a range of partners to increase coherence within the humanitarian sector and improve standards.

The UK has built an effective network of donors and partners, using its convening power to wield influence and provide practical coordination support. However, there is a need to solicit the voices of victims and survivors more actively, both in high-level forums and on a day-to-day basis in humanitarian response operations. While the UK has worked to strengthen information sharing and reporting on SEA, we found that important weaknesses and gaps exist in global information sharing, which undermine transparency and accountability. The lack of robust timely data on confirmed incidents of SEA, which are essential for understanding when, where and how exploitation and abuse is taking place, makes the task of reducing risks to vulnerable people much harder.

Although there remain important areas where the coherence of the international effort should be improved, particularly data sharing, the UK government has shown strength and leadership. We therefore award a **green-amber** score for coherence.

Effectiveness: How effective is the UK's approach to protection from sexual exploitation and abuse at programme, delivery partner and sector-wide levels?

Reinforcement of minimum standards has improved the quality of PSEA programming, but insufficient funding for core costs undermines effectiveness, particularly for smaller organisations. Since 2018, FCDO has taken measures aiming to ensure that staff and partners are consistently held to a minimum standard on SEA. The department has introduced mandatory e-training for all FCDO staff and role-specific training as required. It has also developed a Safeguarding Champions network of 85 staff at different levels of seniority, which provides important day-to-day support and ensures that safeguarding remains on the agenda. An SEA risk management capacity has been developed within the department, which requires the logging of SEA risks for each operational context.

FCDO has also imposed requirements and minimum standards on implementing partners, reinforced by training. Partners told us that the department has supported improved awareness and capability among programme staff. However, the implementation of FCDO's requirements demands additional investments in training, monitoring, establishment and maintenance of complaints mechanisms, and investigations. FCDO funding has not always been made available to cover these costs, which is a particular problem for smaller national and local organisations.

Reporting of SEA incidents remains low, particularly among people affected by humanitarian emergencies, despite heightened attention to SEA and increased work to encourage reporting. Our telephone survey of people affected by the humanitarian response in Uganda revealed a reluctance to use aid agencies' SEA reporting or referral mechanisms. Our study of FCDO's own reporting mechanisms showed that the department's wide definition of safeguarding, extending beyond sexual exploitation, abuse and harassment (SEAH), coupled with the way it filtered and selected cases for follow-up, means it has been overwhelmed with cases. The investigations case management system was not calibrated to prioritise reports of SEA perpetrated against affected populations and there were gaps in FCDO's internal guidance available in spring 2021, including on protecting whistleblowers and on ensuring due process and protection of the rights of the accused.

> "Basically, you are going to report, but the length of the process is going to be so tedious you may even give up along the way and the people you're reporting to may be corrupt and fail to attend to you because they have the bigger man on their side. They are corrupt because of their positions and there is also fear to be exposed to the community and be looked at as a victim."
>
> "To me it's three out of ten that report because people fear being stigmatised. Even when it happened to me, I didn't report to anyone, just talked to my two friends, because most times people may not even believe you."
>
> Members of affected communities, Northern Uganda

The UK has made substantial investments in initiatives to prevent perpetrators from being given the opportunity to reoffend, such as employee screening schemes. Such schemes are necessary but have inherent limitations, not least their limited coverage of staff recruited within countries of humanitarian response, who make up the majority of humanitarian aid workers. It will be important to critically assess the level of effort and investment in these schemes to ensure effectiveness and value for money.

The UK's commitment to deliver a survivor-centred approach has not yet been realised. We found that FCDO staff and partners understood what a survivor-centred approach was in principle, but very few were able to describe how this was being delivered in the contexts in which they were working. In terms of providing support to victims and survivors, FCDO has made a large ad hoc financial contribution to the UN's Trust Fund in Support of Victims of Sexual Exploitation and Abuse and has provided financial and political support to the Victims' Rights Advocate and field officers. However, the department has not yet found a consistent approach to ensuring the needs of victims and survivors are met or harm is redressed.

Failures to prevent SEA in humanitarian contexts have been attributed to the culture within individual organisations and in the humanitarian sector overall. Profound power disparities and gender inequality contribute to a culture that normalises exploitation and abuse and discourages reporting. We saw evidence that FCDO is addressing culture change internally and externally, but the absence of baseline data and the immaturity of much of the programming make it impossible to gauge the depth or sustainability of this change.

FCDO's stringent requirements around minimum standards and reporting are helping to encourage culture change in the humanitarian sector. Despite concerns voiced by some about creating a 'tick box' culture around safeguarding, these standards and requirements have raised the profile and seriousness of SEA for delivery partners, and reportedly also for their downstream partners. It is, however, important that FCDO ensures that partners do not become complacent in their approach. In addition, risks of negative side effects of stringent reporting mechanisms and sanctions need careful handling if the aims of transparency and accountability are to be achieved.

The UK has invested substantial political capital and financial and human resources on PSEA, resulting in policy and operational changes. This has contributed to increased awareness, more reporting mechanisms, and better monitoring of these mechanisms and of staff conduct. Nonetheless, it remains widely recognised that there is under-reporting of cases by members of affected populations, and there is no evidence base to show that the measures taken have reduced SEA in contexts of humanitarian crisis. We therefore award an **amber-red** score for effectiveness.

Recommendations

Recommendation 1:

FCDO should focus greater attention on humanitarian responses in country, supporting partners in implementing approaches to protection from sexual exploitation and abuse that are tailored to each context.

Recommendation 2:

FCDO should ensure that trusted mechanisms systematically capture the voices of affected populations, victims and survivors to inform policy and improve operations on sexual exploitation and abuse in humanitarian settings.

Recommendation 3:

FCDO should develop and implement a research agenda on protection against sexual exploitation and abuse that identifies and prioritises key evidence gaps, in particular on what is happening on the ground.

Recommendation 4:

FCDO should ensure that its support of efforts to prevent the re-hiring of perpetrators of sexual exploitation and abuse includes staff recruited in countries of humanitarian response, who make up the majority of humanitarian aid workers.

Recommendation 5:

FCDO should conduct a review of its approach to investigating allegations of sexual exploitation and abuse by humanitarian workers in order to address the points identified by this review.

1. Introduction

1.1 Humanitarian workers sexually exploiting and abusing those they have a duty to support and protect is a persistent problem in the sector. Against a backdrop of the global #MeToo and #AidToo movements,[1] incidents of sexual exploitation and abuse (SEA) involving humanitarian workers continue to surface.

1.2 In the UK, SEA hit the headlines in 2018, when allegations were revealed of SEA perpetrated in Haiti by staff from a UK non-governmental organisation (NGO). The allegations were followed by an immediate upsurge in the reporting of safeguarding incidents to the Charity Commission for England and Wales, with 80 serious safeguarding incidents reported from 26 charities working in the aid sector.[2] That year, the UK government launched a long-term effort to place the safeguarding of vulnerable populations against SEA by humanitarian workers on international and national agendas, with the aim of pushing and supporting strict standards, robust processes and the cultural change necessary to address the widespread problem.

1.3 This review examines the extent to which the UK government's efforts have been effective in preventing and responding to SEA in humanitarian aid contexts. It considers how well the UK government has identified and addressed evidence gaps in best practice for protection from sexual exploitation and abuse (PSEA) and how well it has developed a coherent response to the issue. PSEA approaches are considered by this review to include the prevention and detection of, and response to, SEA.

1.4 In the UK, efforts to address SEA by humanitarian workers fall under the rubric of safeguarding, while international humanitarian agencies and other donors generally use the term PSEA. The UK's concept of safeguarding in the domestic context is broader than PSEA, and is usually understood as protecting at-risk adults and children from physical (including sexual) and emotional abuse, exploitation and neglect. Since 2018, in engaging with the international aid sector, the UK has used the term 'safeguarding' to refer to sexual exploitation, abuse and harassment as understood in the humanitarian sector, although this has led to some definitional confusion. This ICAI review focuses specifically on safeguarding against SEA in the humanitarian sector, perpetrated by humanitarian workers against affected populations, and particularly against people receiving humanitarian assistance. The report therefore only focuses on the aspects of safeguarding that fall under the narrower definition of PSEA. An overview of the many different and overlapping definitions covering the topic under review in this report is set out in **Table 1** below.

Scope of the review

1.5 The review considers PSEA programming, policy and influencing activities by the UK government between 2017 and 2021, the years straddling the October 2018 international safeguarding summit that was hosted by the UK (known as the 'London summit') and at which the UK, alongside other key actors, made significant commitments to sectoral reform. In July 2019, alongside 29 other donors, the UK adopted the recommendation on ending sexual exploitation, abuse and harassment (SEAH) in development cooperation and humanitarian assistance of the Organisation for Economic Co-operation and Development's Development Assistance Committee (OECD DAC). The UK government's strategy[3] on safeguarding against SEAH, published in 2020 and building on OECD DAC and London summit commitments, provides the backdrop to our review. The merger of the Department for International Development (DFID) and the Foreign and Commonwealth Office (FCO)[4] in September 2020 into the Foreign, Commonwealth and Development Office (FCDO), recent reductions in humanitarian aid funding, and the impact of the COVID-19 pandemic on operations and humanitarian access also add important context to our findings.

1 'Powerful Men, Failing Upwards', Riley, C. L., *Journal of Humanitarian Affairs*, 2020, 2(3), pp. 49-55, link.
2 'Aid groups report 80 harm cases to charity watchdog', *The Guardian*, 5 March 2018, link.
3 *UK Strategy: Safeguarding Against Sexual Exploitation and Abuse and Sexual Harassment within the Aid Sector*, UK government, 2020, p. 4, link.
4 Key roles in the management of the UK's approach to safeguarding in the aid sector were undertaken by DFID officials until September 2020, and thereafter by broadly the same group of officials now employed by FCDO. For ease of reference, we refer to these as "DFID/FCDO officials" and to the former DFID and former FCO when referencing these departments and their activities before the September 2020 merger.

Table 1: Definitions used in this review

Definitions
Safeguarding: In its broadest sense, safeguarding refers to a set of issues including both the environment and people. It includes the protection of individuals from physical, psychological and emotional abuse, exploitation and neglect.
Sexual exploitation, abuse and harassment (SEAH): This has been the focus of the UK government's strategy on safeguarding for the aid sector.[5] It includes sexual exploitation, abuse and harassment both of crisis-affected populations and of aid workers. In this review, SEAH against aid workers is not in scope, apart from when locally hired aid workers are themselves aid recipients or belong to affected communities.
Protection from sexual exploitation and abuse (PSEA): We use the term PSEA to include the prevention and detection of, and response to, sexual exploitation and abuse of people affected by humanitarian emergencies, perpetrated by aid workers.
Sexual exploitation: Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.
Sexual abuse: The actual or threatened physical intrusion of a sexual nature whether by force or under unequal or coercive conditions.
Sexual harassment: Unwelcome sexual advances (without touching). It includes requests for sexual favours or other verbal or physical behaviour of a sexual nature, which may create a hostile or offensive environment.

1.6 A key focus of the review is how well PSEA approaches work in practice in humanitarian settings. To evidence this, we consulted people affected by humanitarian responses. We include in our definition of affected populations both people receiving humanitarian assistance and people in communities affected by humanitarian response, including host communities in areas of displacement, or people living in communities that have been transformed by the large-scale arrival of humanitarian actors. In keeping with a survivor-centred approach, recognising that some people identify with the term 'victim' while others prefer 'survivor', we refer to those directly affected by SEA as 'victims and survivors'.

1.7 This review focuses on humanitarian settings, where power imbalances between providers and recipients of aid are particularly stark, and vulnerability to SEA among aid recipients and affected populations can be high. For the purposes of this review, the term 'aid worker' comprises anyone working in the management or delivery of humanitarian assistance. This includes staff recruited internationally, nationally and locally, as well as government staff working under the management of humanitarian organisations or incentivised volunteers and community workers from among the target or host population.

1.8 While recognising that SEAH of aid workers by other aid workers is also a serious issue, this was outside the scope of this review. The exception to this rule is locally hired aid workers who are themselves members of affected communities.[6]

[5] *UK Strategy: Safeguarding Against Sexual Exploitation and Abuse and Sexual Harassment within the Aid Sector*, UK government, 2020, p. 4, link.

[6] We kept within scope incentive workers and local community members applying for jobs in humanitarian response efforts. There are different lines of accountability and response for personnel with contracts who can avail themselves of employment and other rights to which aid service-users, or community members applying for aid jobs or working as volunteers, do not have recourse. *The UK's approach to safeguarding in the humanitarian sector, literature review*, ICAI, February 2022, available on ICAI's website.

1.9 The review did not look at SEA perpetrated by international peacekeepers, as this was the focus of a separate ICAI review.[7] Nor did it include aid programming by non-FCDO official development assistance (ODA) spending departments as their humanitarian aid expenditure is marginal.

1.10 This review builds on a number of related reviews and inquiries that have taken place, including three reports by the International Development Committee (IDC). The most recent of these was published in January 2021 and considered UK government progress on tackling the SEA of those intended to benefit from UK aid.[8]

1.11 Failure to protect affected populations from SEA undermines the achievement of a wide range of sustainable development goals (SDGs) and the commitment to 'leave no one behind'. The main SDGs, and the ways in which PSEA principally relates to them, are illustrated in **Box 1**.

Box 1: How this review relates to the Sustainable Development Goals

The Sustainable Development Goals (SDGs), otherwise known as the Global Goals, are a universal call to action to end poverty, protect the planet and ensure that all people enjoy peace and prosperity.

This review of the UK's response to sexual exploitation and abuse in the humanitarian sector relates to the following SDGs, with many others also being relevant:

Goal 1: No poverty – With 700 million people across the world living in poverty and struggling to fulfil basic needs like food, health, education, and access to safe water and sanitation, vulnerability to SEA is an increased risk

Goal 8: Decent work and economic growth – Economic opportunity for women, men, young people and people with disabilities improves their livelihoods and contributes to their safety

Goal 5: Gender equality – PSEA requires a fundamental shift towards a world with gender equality and away from discrimination and violence, as well as universal access to sexual and reproductive healthcare

Goal 16: Peace, justice and strong institutions – Accountability and provision of access to justice through inclusive and responsive systems can prevent and support victims of SEA

Goal 17: Partnerships for the goals – Through inclusive multi-stakeholder partnerships and mobilisation of resources at the global, regional, national and local levels, governments, the private sector and civil society can work towards a shared vision for safer humanitarian aid

[7] *Sexual exploitation and abuse by international peacekeepers: an accompanying report to the ICAI review of the Preventing Sexual Violence in Conflict Initiative*, ICAI, September 2020, link.

[8] *Progress on tackling the sexual exploitation and abuse of aid beneficiaries*, Seventh Report of Session 2019-21, House of Commons International Development Committee, 14 January 2021, link.

Table 2: Our review questions

Review criteria and questions	Sub-questions
Relevance: How well has the UK government gone about building a relevant and credible portfolio of safeguarding programmes and influencing activities?	• How relevant and appropriate is the UK government's approach to protection from sexual exploitation and abuse (PSEA)? • How relevant and appropriate is the UK's approach to building the evidence base on the scale and nature of PSEA and on 'what works' in prevention and response? • How well does the UK government's approach reflect the needs and priorities of affected communities in humanitarian contexts and of victims and survivors?
Coherence: How well does the UK work with other donors and multilateral partners to ensure a joined-up global approach to protection from sexual exploitation and abuse?	• Is the UK's approach coherent and consistent with the efforts of other humanitarian funders and agencies, and does this reflect a shared approach across government?
Effectiveness: How effective is the UK's approach to protection from sexual exploitation and abuse at programme, delivery partner and sector-wide levels?	• How effective is the UK government's support to its implementing partners to strengthen systems, train staff and engage communities in preventing, detecting and responding to sexual exploitation and abuse (including investigating allegations, taking action against perpetrators and supporting witnesses, victims and survivors)? • How effective is the UK's approach in responding to incidents and preventing perpetrators from reoffending? • To what extent have PSEA measures promoted by the UK led to changes in attitudes and behaviours in humanitarian operations?

2. Methodology

2.1 Our review followed the methodology and sampling approach described in our approach paper[9] and summarised in **Figure 1**. It included the following elements:

Literature review: We reviewed the literature on protection from sexual exploitation and abuse (PSEA) covering definitional issues, data on incidents, prevalence, scale and trends, causal mechanisms, and evidence on 'what works' in PSEA in humanitarian settings. Our literature review informed our findings and is published as a separate report.[10]

Strategy review: We reviewed the UK government's strategy and approach to safeguarding with specific reference to humanitarian aid. This included assessment of strategy papers, policy and programme commitments, guidance, meeting records, stakeholder interviews and written submissions received via an online survey.

Country case studies: We looked in detail at the UK's approach to PSEA in Bangladesh, Uganda and Yemen. Working remotely because of COVID-19 travel restrictions, we interviewed FCDO staff and programme partners in each country and working along different humanitarian aid delivery chains. We explored how each implementing partner was accountable to and supportive of others in their delivery chain, as well as affected people. We consulted people affected by humanitarian programme responses in the West Nile sub-region of Uganda and in Southern Yemen using quantitative and qualitative telephone surveys. The methodology, limitations, ethics, safeguarding and COVID-19 challenges are described in Annex 1. Given the dearth of primary data about PSEA and its impact on affected people, particularly from the perspective of those affected, this engagement provided an important source of evidence in answering the review questions and in testing the claims and assumptions of implementing partners about how they engage with affected communities.

Desk reviews to inform three thematic case studies:

1. **Support and capacity development for implementing partners:** We reviewed management documents, evidence from interviews and website sources to assess FCDO's 'dual approach' to capacity building: an external focus on building the capacity of smaller, local partners in partner countries, and an internal focus on strengthening the department's own capability to promote behaviour change and embed safeguarding among partners. We looked at the Resource Support Hub, the Open University safeguarding course (Module 1), and support to FCDO Programme Managers, Senior Responsible Owners and the Safeguarding Champions Network to strengthen due diligence processes, build risk management capacity and better manage sexual exploitation and abuse (SEA) cases. We heard from a sample of FCDO's implementing partners how these initiatives were helping them to develop their safeguarding capabilities and systems.

2. **Investigations case management:** We conducted ten in-depth interviews with FCDO staff and external partners, reviewed some 140 documents and used case data analysis to assess how FCDO handles SEA cases perpetrated by humanitarian workers against affected populations. We looked in depth at FCDO's oversight of how implementing partner organisations dealt with complaints, investigation and follow-up of such cases. We considered FCDO policies, processes and guidelines and good practices followed by other agencies.

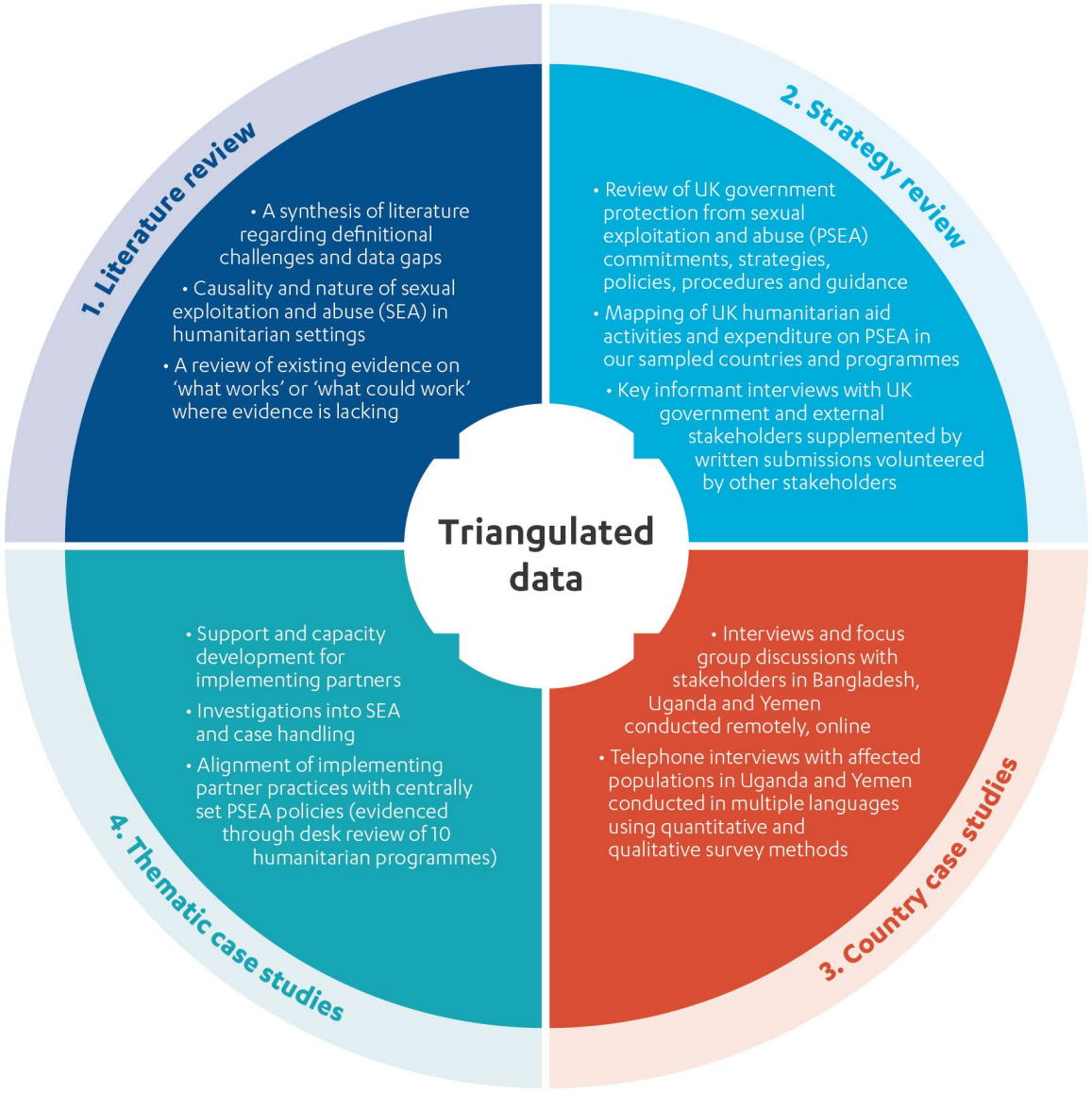
   We sampled all 318 cases from Bangladesh, Uganda and Yemen reported to FCDO's Safeguarding Investigations Team (SIT) during the four financial years 2017-18 to 2020-21. This represented around a quarter of SIT's total caseload in this period. The 318 cases covered a range of complaints including workplace misconduct issues between staff and broader protection cases (such as corporal punishment and child labour perpetrated by non-aid workers, which are not relevant to the scope of this inquiry). Out of the 318, we reviewed the 40 case summaries that involved SEA towards people from affected populations, followed by an in-depth study of three cases from this subset.

[9] *The UK's approach to safeguarding in the humanitarian sector*, approach paper, ICAI, July 2021, link.
[10] *The UK's approach to safeguarding in the humanitarian sector, literature review*, ICAI, February 2022, available on ICAI's website.

3. **Alignment of implementing partner practices with FCDO-set PSEA policies:** We conducted desk reviews of components of large humanitarian programmes under implementation in our case study countries. Our sample comprised programmes at 'high risk' for SEA, involving direct interaction with at-risk individuals and communities. The sample covered a diversity of funding mechanisms, including programme components funded directly, sub-contracted through the UN, international non-governmental organisations (INGOs) and through mechanisms such as pooled funds. The desk reviews were based on programme documentation including business cases, annual reports and evaluations, triangulated with telephone interviews.

2.2 Our research was conducted in line with strict safeguarding and ethical protocols, as set out in our approach paper.[11]

Figure 1: Summary of methodology



2.3 The evidence used in the review was collected through the survey of 600 affected people, interviews and focus group discussions with 232 stakeholders, 53 written submissions and the review of over 1,000 documents. Limitations of the methodology are listed in **Box 2**.

[11] *The UK's approach to safeguarding in the humanitarian sector*, approach paper, ICAI, July 2021, pp. 13-14, link.

Box 2: Limitations of the methodology[12]

Getting robust data and evidence on SEA in humanitarian settings is challenging.

- SEA definitions are contested and interpreted differently by different actors, which can make comparison difficult.
- SEA is a highly sensitive issue and stakeholders may have been unwilling or unable to speak openly and candidly, which may have skewed our evidence. The sensitivity of the topic also required us to adopt a cautious approach with strict research ethics and protocols to ensure that the rights and anonymity of victims and survivors of SEA are protected, and the risk of re-traumatisation or retaliation avoided.
- There is limited data and peer-reviewed literature on the subject.
- PSEA requires action under every UK aid-funded humanitarian programme and is context-specific, making it difficult to generalise findings to humanitarian aid as a whole.
- There are methodological challenges associated with attributing results to the UK's influencing work on PSEA, given the involvement of many other actors.
- Many of FCDO's centrally managed safeguarding programmes are still at an early stage of implementation and are yet to generate outcome-level results.
- COVID-19 restrictions required us to engage with affected populations using telephone survey methods. This may have biased consultations away from more marginalised groups including poorer and more remote households and women who are less likely to have access to a mobile phone.

[12] Further described in *The UK's approach to safeguarding in the humanitarian sector, approach paper*, ICAI, July 2021, link.

3. Background

3.1 The international humanitarian system performs a critical role in saving lives and reducing suffering in countries in conflict and crisis, but the humanitarian sector is failing in its duty to do no harm. While its scale and scope is unknown, sexual exploitation and abuse (SEA) of affected populations perpetrated by aid workers is a serious and persistent problem. Despite reforms dating back as far as the 2002 'sex-for-aid' scandal in West Africa, SEA is believed to be widespread in the sector. High-profile cases continued to be reported throughout the period of this ICAI review, beginning in 2018 with a scandal triggered by historical cases in Haiti and ending in 2021 with an independent investigation[13] evidencing serious cases of SEA by humanitarian workers in the Democratic Republic of the Congo (DRC) (see **Figure 2**).

Figure 2: Safeguarding timeline of key events, 2002 to 2021

[13] *Final Report of the Independent Commission on the review of sexual abuse and exploitation during the response to the 10th Ebola virus disease epidemic in DRC*, WHO, 28 September 2021, link.

3.2 In addition to the significant suffering that SEA causes victims and survivors, its widespread nature also undermines the credibility of humanitarian action by the UN, donors, state and non-state actors, and the UK's broader international commitments. The latter include Sustainable Development Goal 5 pertaining to gender equality and empowerment for women and girls, legal requirements under the International Development Gender Equality Act (2014) to meaningfully consider the impact of all development assistance from a 'do no harm' and gender equality perspective, and Strategic Outcome 4 of the UK National Action Plan on Women, Peace and Security, which recognises that women and girls face heightened risk of exploitation and abuse in humanitarian contexts and require more tailored attention from humanitarian interventions.

3.3 Humanitarian organisations have a responsibility and commitment to protect the people they serve from harm, including harm caused by their own personnel or programmes. This is tied to a commitment to accountability to affected populations (AAP), by using power responsibly, taking account of, giving account to, and being held to account by the people they seek to assist.[14] Sectoral standards, articulated by the Inter-Agency Standing Committee (IASC), hosted by the United Nations Office for the Coordination of Humanitarian Affairs (OCHA) and under the Core Humanitarian Standard on Quality and Accountability (CHS), require organisations to work in partnership with affected populations, soliciting their views, listening to them, and taking meaningful action. AAP includes an obligation to feed back to affected communities what action has been taken in response to their expressed needs and concerns.[15] These principles have been adopted by FCDO and are integrated into its safeguarding work. They are also tied to other areas in which the UK has played a strong role in developing humanitarian policy, in particular by empowering national responders as part of work on localising humanitarian response.[16]

Key issues and challenges

Causality and nature of sexual exploitation and abuse in aid settings

3.4 SEA is a manifestation of the abuse of power. The literature consistently emphasises the gendered nature of SEA, which disproportionately affects women and girls, but boys and men can also fall victim. People who identify as lesbian, gay, bisexual, transgender or queer (LGBTIQ+) may be especially vulnerable to SEA, particularly in contexts where homosexuality is illegal or deemed socially unacceptable and there are few legal or community-based protections. Other individual risk factors include age, disability, socio-economic status, migrant status, race and ethnicity. Isolation also increases risk, especially for internally displaced people (IDPs), children and female-headed households.[17]

3.5 There are a range of structural factors driving SEA. Some drivers present immediate opportunities for perpetrators, such as the lack of law and order that often characterise humanitarian settings. Other drivers reinforce normalisation of SEA, such as individual and organisational attitudes and norms that enable or condone SEA, including structural sexism and racism. Most evidence on the causal drivers of SEA is context-specific, making it challenging to identify general patterns. Instead, risks must be understood and addressed differently in different contexts. Context-sensitive risk mitigation approaches are needed to prevent and respond to incidents.[18]

Available data and evidence of 'what works' in preventing and responding to sexual exploitation and abuse

3.6 No systematic data on the prevalence of SEA across the humanitarian sector exists, beyond context-specific incidents (for instance, in relation to specific humanitarian responses). The quality of reporting across governments, multilateral agencies and international and local NGOs also varies greatly, making it challenging to identify any macro-level trends or patterns. Evidence of 'what works' in preventing and

[14] *Accountability to Affected Populations (AAP): A brief overview*, Inter Agency Standing Committee, n.d., link.
[15] *Commitments on Accountability to Affected People and Protection from Sexual Exploitation an Abuse*, IASC Task Team on Accountability to Affected Populations and Protection from Sexual Exploitation and Abuse, November 2017, link.
[16] *The UK's approach to funding the UN humanitarian system*, ICAI, 18 December 2018, link. *Localisation in the Context of UK Government Engagement With the Humanitarian Reform Agenda*, Goodwin, E. and Alger, A., Frontiers in Political Science, 17 September 2021, link.
[17] *Global Evidence Review of Sexual Exploitation and Abuse and Sexual Harassment (SEAH) in the Aid Sector*, Feather, J., Martin, R. and Neville, S., Resource as Support Hub, UKAID, January 2021, p. 6, link.
[18] *The UK's approach to safeguarding in the humanitarian sector, literature review*, ICAI, February 2022, available on ICAI's website.

responding to SEA in humanitarian settings is also limited. There are no systematic evaluations, portfolio reviews or reliable outcome data on PSEA efforts across the humanitarian sector.[19]

3.7 PSEA approaches in the humanitarian sector generally fall into two main areas:

Prevention, including proactive communication with affected communities about their rights, establishment of an accountable 'speak up' culture, effective risk management, and the development and better application of PSEA standards and policies in recruitment, vetting and human resource management, including training and disciplinary procedures.

Response, including the establishment of safe, effective and responsive complaints mechanisms, fair and transparent investigations, and a victim and survivor-centred response, including consideration of medical, legal and psychosocial needs.

3.8 To achieve accountability, organisations need to integrate the experiences of victims and survivors in the design and delivery of PSEA efforts, ensuring their consent and protection of confidentiality throughout.[20]

The nature of humanitarian contexts

3.9 The urgency and fast-changing nature of humanitarian crises, combined with a high influx of new staff and quick staff turnaround associated with many emergency contexts, often means that safeguarding is not prioritised at the onset of new crises. During the Ebola crisis in the DRC between 2018 and 2020, the surge in new responders, together with a high demand for and unequal access to essential goods, increased the risk of SEA. Similar risks are present during the current COVID-19 pandemic.

3.10 In order to understand the challenges posed by different contexts, the review looked in detail at humanitarian crises in three countries: Bangladesh, Yemen and Uganda. Background on the three countries is provided in **Boxes 3, 4** and **5**. The three crises differ in their nature and scale, the extent of the national response, and the access afforded to humanitarian responders. The country case studies serve to illustrate the importance of context-specific responses to humanitarian crises and to PSEA.

Box 3: Bangladesh

Bangladesh is one of the most densely populated countries in the world and highly vulnerable to natural disaster. More than 80% of the population is exposed to risks of floods, earthquakes and drought, and more than 70% to cyclones.[21] Bangladesh hosts one of the world's largest refugee populations, around 950,000 Rohingya people who have fled violence and persecution in Myanmar. Virtually all Rohingya refugees are settled in 34 camps in the Cox's Bazar region.[22]

The Office of Refugee Relief and Repatriation within Bangladesh's Ministry of Disaster Management oversees and coordinates the humanitarian operations in Cox's Bazar. Humanitarian agencies and international and national NGOs have deployed a large number of humanitarian workers to the area. In 2021, some 134 agencies, NGOs and government bodies worked together under the 2021 Joint Response Plan to support 1.4 million refugees and affected host community members. [23]

Bangladesh is not party to the UN Refugee Convention. The government does not confer formal refugee status on Rohingya refugees, with the rights and entitlements this entails. Government policies are directed at ensuring settlement is temporary, with restrictions on livelihoods opportunity, mobility and formal education for children in the camps.

The camps are difficult environments, with the population, highly traumatised by atrocities suffered in Myanmar, squeezed into densely populated camps with very basic services. Protection is a huge challenge, and camps are afflicted by violence, trafficking, and organised crime and criminal gangs. Protection

19 *The UK's approach to safeguarding in the humanitarian sector, literature review*, ICAI, February 2022, available on ICAI's website.
20 *Developing and modelling a positive safeguarding culture: A tool for leaders, Survivor-centred approach*, Bond, 2021, link.
21 *Bangladesh Disaster Risk and Climate Resilience Program*, Brief, World Bank, July 2018, link.
22 *Global Focus UNHCR Operations Worldwide: Bangladesh*, People of Concern, UNHCR, 2021, link.
23 *2021 Joint Response Plan Rohingya Humanitarian Crisis*, OCHA, 2021, link.

challenges are exacerbated by curfews that restrict access to the camps in the evenings by humanitarian workers. The broader restrictions introduced to contain the spread of COVID-19 resulted in many services in the camps being stopped, including protection services. Victims and survivors of SEA are made more vulnerable in patriarchal contexts where women have less power and fewer rights, and risks associated with stigma have a stifling effect on reporting.

Box 4: Uganda

With around 1.5 million refugees,[24] Uganda is host to one of the largest refugee populations in the world and the largest in Africa. Roughly two-thirds of refugees are South Sudanese (65.6%), just under one-third are Congolese (30.8%) and a small proportion (3.5%) Burundian.[25]

Apart from those residing in the capital, Kampala, the vast majority of refugees are hosted in 13 settlements established on land donated by local communities in collaboration with the Office of the Prime Minister. This 'Ugandan Model' is widely praised and considered among the most progressive refugee policies in the world. It allows relatively open borders and supports the integration and self-reliance of refugee and host communities. It provides land allocations to refugees as well as the right to work, study, access social services and enter into contracts and allows Ugandan nationals to access some of the services provided to refugees by the international community. While this generosity is commendable, it remains the case that many self-settled refugees live in deep poverty and are highly vulnerable to exploitation and abuse. [26]

There is a reluctance to report SEA, as evidenced in recent studies[27] and in ICAI's own survey. This is a likely contributory factor to the low levels of SEA cases reported in the Inter-Agency Feedback, Referral and Resolution Mechanism (FRRM). The FRRM dashboard[28] shows that out of a total 84,215 calls referred by the central helpline to agencies since 2018, just 27 concerned SEA.

In March 2017, the Ugandan government launched the Comprehensive Refugee Response Framework, with the United Nations Refugee Agency (UNHCR) supporting its implementation. However, there is a history of corruption and fraud in the refugee response. In February 2018, senior officials in the Office of the Prime Minister were suspended pending investigations into alleged collusion with staff at UNHCR and the World Food Programme to exaggerate refugee figures. The UK, along with Germany and Japan, responded by suspending in-country funding to UNHCR – although the other governments resumed their assistance not long afterwards.[29]

General underfunding and continued growth of the refugee population have resulted in, for example, a 30% cut in food rations for refugees in April 2020, and a further 10% cut in 2021.[30] While efforts are being made to reduce the impact of cuts on the most vulnerable, this, combined with the COVID-19 pandemic, will worsen the well-being of refugees in Uganda, including their protection and livelihoods.

24 *Uganda – Refugee Statistics Dashboard June 2021*, UNHCR, 13 July 2021, link.
25 *Uganda – Refugee Statistics Dashboard June 2021*, UNHCR, 13 July 2021, link.
26 See, for example, *Who is watching? Refugee protection during a pandemic - responses from Uganda and South Africa*, Moyo, K., Sebba, K. R. and Zanker, F., CMS 9, 37 (2021), link; *Community-based GBV mobilisation and prevention: Lessons from CARE International in Uganda*, CARE, 2019, p. 2 link.
27 *Empowered Aid: Transforming gender and power dynamics in the delivery of humanitarian aid. Participatory action research with refugee women & girls to better prevent sexual exploitation & abuse – Uganda Results Report*, Potts, A., Kolli, H., Hedge, E. and Ullman, C., The Global Women's Institute at The George Washington University, International Rescue Committee, 2020, link.
28 *Inter-Agency Feedback, Referral and Resolution Mechanism (FRRM) dashboard*, Government of the Republic of Uganda and UNHCR, accessed 26 October 2021, link. The FRRM was launched in October 2018 and enables UNHCR, the Ugandan government and humanitarian partners to effectively manage feedback, enquiries and complaints received from affected people. Its helpline receives and categorises complaints received from the public then refers these to relevant agencies for resolution, link. The FRRM public dashboard displays the types of calls received by location, sector and category. By December 2020 the FRRM had received over 180,000 calls from 50,000 individual callers, link.
29 'Key donors freeze Uganda refugee aid after UN mismanagement scandal', Samuel Okiror, *The New Humanitarian*, 28 February 2019, link.
30 *Global Focus UNHCR Operations Worldwide: Uganda*, UNHCR, 2021, link.

Box 5: Yemen

Yemen was already one of the poorest countries in the Middle East before civil war broke out in March 2015, driving the country into severe crisis. At the end of 2020, around 21 million Yemenis (two-thirds of the population) needed humanitarian assistance. By 2021 this had risen to some 24.8 million people (around 80% of the population), including 5 million on the brink of famine. The UN describes the situation in Yemen as the world's worst humanitarian crisis.[31]

With more than four million Yemenis displaced since the beginning of the crisis, Yemen now has the fourth-largest number of IDPs in the world. Yemen also hosts more than 135,000 refugees and asylum seekers from Somalia and Ethiopia. Around two-thirds of the internally displaced in Yemen live in dangerous locations, characterised by widespread food insecurity and lack of basic services.[32] The humanitarian situation was exacerbated in 2020 by escalating conflict, the COVID-19 pandemic, and a range of other crises, including economic collapse, outbreaks of infectious disease, flooding, locusts, and a fuel crisis across northern governorates. These issues had an impact on humanitarian assistance, which was already highly restricted due to access challenges and insecurity that hindered a response delivered in accordance with humanitarian principles.[33]

Among both IDPs and refugees, vulnerability to SEA is heightened for women, children, people with disabilities, older people and historically marginalised groups such as the Muhamasheen, a minority community who are subjected to caste-based discrimination. In 2019 Amnesty International reported that Yemen was "one of the worst places in the world to be a woman".[34] Women and girls are disadvantaged by economic inequality, a discriminatory legal system, child marriage, divorce shame, domestic violence, and forced niqab and honour killings. Women and girls have also been disproportionately affected by the ongoing conflict.

The Inter-Agency Standing Committee (IASC), hosted by the United Nations Office for the Coordination of Humanitarian Affairs (OCHA), leads a coordinated approach to PSEA measures in Yemen with PSEA focal points within settlements. Despite efforts to strengthen the protection environment, significant gaps in protection capacity remain across Yemen. The IASC estimates that in 2019 and 2020, at most only 25% of the affected population could access safe complaints channels and SEA assistance.
The issue of unrepresentative and unreliable data compounds any efforts to have a clear picture of the relevance and effectiveness of PSEA measures in Yemen.

The challenge of interagency working

3.11 Effective responses to humanitarian crises require a multiplicity of actors, including government, multilateral agencies, bilateral donors, civil society organisations (CSOs) and private sector service providers, to work together along a humanitarian delivery chain to supply goods, services and information to affected populations.

3.12 This can involve the very rapid deployment of thousands of aid workers into dangerous situations, where law and order, service and community infrastructure may have broken down. In these circumstances, interagency working becomes paramount, with the coordination of responses and sharing of information between government and agencies essential. It is also a prerequisite for establishing coherent policies that can drive up standards and deliver culture change across the international aid sector.

Risk of SEA set to grow as humanitarian crises become more frequent

3.13 Protracted and acute humanitarian emergencies, including conflict, natural disasters and widespread and often systematic violations of human rights, cause devastation to millions globally. Climate change, combined with the fallout of the COVID-19 pandemic, means that humanitarian emergencies are expected to rise in coming years. The 2021 Global Humanitarian Overview states that a record 235 million

31 *Global Focus UNHCR Operations Worldwide: Yemen*, UNHCR, 2020, link.
32 *Yemen crisis explained*, UNHCR, March 2021, link.
33 *Yemen Humanitarian Response Plan*, OCHA, 2021, p. 5, link.
34 *Yemen: One of the Worst Places in the World to be a Woman*, Amnesty International, 2019, link.

people will require humanitarian assistance in the next year, an almost 40% increase on 2020, attributed primarily to the impacts of COVID-19.

3.14 It is estimated that around one in four people in need of humanitarian assistance are women and girls of reproductive age, who, along with other marginalised groups, are particularly at risk of SEA. This risk is increased by the socio-economic impacts of the pandemic, including loss of income, school closures and restriction of access to health and social services.[35] The risk is particularly high in areas where humanitarian organisations and donors are unable to be consistently present where assistance is being provided. Impunity flourishes in such closed environments where power dynamics are exaggerated and monitoring is more difficult.

> "... two years before, it was better but ever since corona started in these two years it has worsened. The young girls no longer go to school and a lot of peer influence has got into the youth that has increased the basis of teenage pregnancies and rape cases."
>
> Member of affected community, Northern Uganda

The UK government's safeguarding strategy and programme portfolio

3.15 The UK government's 2020 strategy for safeguarding in the aid sector[36] pledges that the UK will work at three levels to tackle SEA: across the aid sector, within UK government organisations, and through partners and programmes. It will support interventions that promote accelerated deterrence and prevention, victim and survivor-centred reporting and response, culture change and sector-wide capability and mutual accountability. This ICAI review only covers FCDO programming, which is responsible for the vast majority of UK humanitarian aid spending.

3.16 For this review, we looked at the programmes managed directly by FDCO's Safeguarding Unit in so far as they related to safeguarding in the humanitarian sector. We also considered FCDO's portfolio of humanitarian programmes delivered both bilaterally and through core contributions to multilateral agencies.

3.17 In 2019, the former Department for International Development (DFID) had planned to spend at least £40 million on centrally managed programmes and activities earmarked for safeguarding over the period 2019-24. The four main centrally managed FCDO safeguarding programmes under implementation in 2021 as part of this commitment are detailed in **Table 3**.

Table 3: FCDO centrally managed safeguarding programme commitments

Safeguarding Innovation and Engagement Programme Fund (2018-24, £4.4 million)	Provides responsive expert advice and technical assistance on safeguarding to DFID/FCDO, pilots and implements approaches to raise safeguarding standards for DFID/FCDO, and engages and convenes partners to drive up standards and deliver culture change across the international aid sector.
Project Soteria (2019-25, £10 million)	Supports aid organisations to stop perpetrators of SEAH from working in the aid sector via more and better criminal record checks on staff. Includes collaboration with Interpol and ACRO, the UK criminal records body.

[35] *Effect of the Covid-19 pandemic on refugee communities*, Research Briefing, UK Parliament, 10 November 2020, link.
[36] *UK Strategy: Safeguarding Against Sexual Exploitation and Abuse and Sexual Harassment within the Aid Sector*, UK government, 2020, link.

Safeguarding Resource and Support Hub (2019-24, £10 million)	Provides support to aid organisations to strengthen their safeguarding policy and practice against SEAH. Primarily intended to support smaller, local NGOs in developing countries and those operating in high-risk environments which are least able to pay for this support themselves. The Hub is delivered via an open-access, online platform and regional hubs initially in Ethiopia, Nigeria and South Sudan.
Supporting Survivors and Victims of Sexual Exploitation and Abuse and Sexual Harassment (2020-25, £5 million)	Support is offered through four components: promoting and strengthening reporting mechanisms, improving the aid sector's capacity to conduct high-quality investigations, improving delivery of support to survivors in country, and promoting the range and quality of services available to survivors and victims.

3.18 In 2019, the UK's ODA spending on humanitarian programmes was £2,205 million, comprising £1,536 million bilateral humanitarian aid and £669 million imputed UK share of multilateral net humanitarian aid.[37] Unlike in previous years, the official statistics published in September 2021 do not include the imputed UK share of multilateral net humanitarian aid in 2020. OCHA's Financial Tracking Service listed the UK as the fourth-highest bilateral spender of humanitarian assistance behind the US, Germany and the European Commission. Following the UK government's reduction in the ODA spending target from 0.7% to 0.5% of gross national income, it is expected that there will be a reduction in humanitarian aid spending in 2021 compared to 2020. Because of the way expenditure is recorded, it is not possible to quantify how much of total spending on humanitarian programming has been allocated to safeguarding initiatives.

3.19 FCDO's Conflict, Humanitarian and Security Department (CHASE) responds to humanitarian needs arising from conflict and natural disasters. The largest portion of CHASE programming is for core funding to key humanitarian partners. This funding is unearmarked and provides agencies with the flexibility to disburse funds rapidly, to respond immediately when a crisis hits, to perform anticipatory action so crises are less severe, to respond to neglected crises, and to invest in central functions (including safeguarding mechanisms) to enhance efficiency and controls across their global operations. The flexible nature of this core funding means that FCDO cannot attribute specific amounts to any single PSEA initiative. However, the programme includes PSEA performance indicators against which agencies report on PSEA-related activities and through which FCDO is able to hold agencies to account. FCDO carries out Central Assurance Assessments on each agency which include a specific safeguarding focus, and FCDO staff are active participants in regular governance and other meetings through which agency PSEA-related activities are scrutinised.

[37] Additional Tables Statistics on International Development: final UK aid spend 2020, FCDO, September 2021, Tables A7 and A9, link.

4. Findings

Relevance: How well has the UK government gone about building a relevant and credible portfolio of safeguarding programmes and influencing activities?

The UK has used its resources, influence and convening power to galvanise action on sexual exploitation and abuse in the humanitarian sector, acting as an important catalyst for change and complementing other initiatives at both international and local levels

4.1 The international safeguarding summit hosted by the UK government in London in 2018 helped focus attention in the humanitarian sector on prevention of sexual exploitation and abuse (PSEA). The UK used its convening power and influence as a prominent donor to focus a spotlight on an issue that was not receiving enough attention and to bring a diverse array of actors to the table to make specific commitments to improving prevention and response. We heard the London summit described as "a shot of adrenaline" and "a galvanising moment".

4.2 The London summit also played a catalytic role at local level. In Bangladesh, we heard that the heightened attention to safeguarding resulting from the summit added impetus to efforts already under way to address sexual exploitation and abuse (SEA) of Rohingya refugees in camps in Cox's Bazar. In Uganda, stakeholders noted that it dovetailed with wider work on corruption and abuse of power issues in the refugee response.

The UK has developed a wide-ranging strategy comprising four 'strategic shifts' that reflect a broad consensus on priority actions and interventions

4.3 The UK's strategy on *Safeguarding Against Sexual Exploitation and Abuse and Sexual Harassment within the Aid Sector* aims to provide a comprehensive approach to safeguarding. This includes measures aimed at preventing and responding to incidents, listening to people with practical experience, particularly victims and survivors, and learning from every case. There is also a commitment to building capacity and capability at all levels of the sector. This strategy generally reflects the priorities of the humanitarian sector and shows a good balance of learning from and adopting existing standards and approaches and innovating or investing in new initiatives.

4.4 The strategy identifies four long-term 'strategic shifts':

- To ensure **support for survivors**, victims and whistleblowers, enhance accountability and transparency, strengthen reporting, and tackle impunity.
- To incentivise **cultural change** through strong leadership, organisational accountability and better human resource processes.
- To adopt **global standards** and ensure that they are met or exceeded.
- To strengthen **organisational capacity and capability** across the international aid sector to meet these standards.

4.5 The strategy acknowledges the long-term nature of the challenge of ensuring safeguarding against SEA in the aid sector and commits to taking both short- and long-term measures to address it. This long-term commitment is realised through inclusion of minimum safeguarding standards in FCDO systems such as enhanced due diligence, business cases and funding agreements. The strategy aims to drive higher standards and meaningful, long-term leadership and culture change on safeguarding against sexual exploitation, abuse and harassment (SEAH), both within the UK government and the whole aid sector. Delivery of the strategy is led on a day-to-day basis by the Safeguarding Unit which was established in February 2018, with quarterly oversight by a Safeguarding Delivery Board and annual discussion by the FCDO Management Board. A Safeguarding Champions Network (established in January 2020) helps to embed safeguarding norms and practices in order to effect long-term behavioural change within FCDO.

The UK safeguarding strategy was developed based on wide consultations but lacks systematic ongoing engagement with crisis-affected people, especially victims and survivors of SEA

4.6 In preparation for the 2018 London summit, the UK engaged a diversity of actors, and their input helped inform the priorities of both the event and the UK safeguarding strategy. Key actors from the humanitarian sector included representatives from the UN, NGOs, international financial institutions, private sector suppliers, research funders, donors, CDC Group (rebranded on 4 April 2022 as British International Investment), the Global Fund and GAVI, the Vaccine Alliance. Following the London summit, an Independent Reference Group was formed, made up of individuals with technical and practitioner expertise in SEA and sexual harassment from multiple disciplines. We found that the consultation was meaningful, as evidenced by adaptations and course corrections, in developing the strategy. However, some stakeholders involved in ongoing consultation mechanisms told us it had become less clear in the post-London summit period how their input was being used to shape policy.

4.7 While the UK's initial activities drew substantially on domestic safeguarding policies and practice, it soon aligned its approach with the established terminology and processes in the international humanitarian sector around PSEA, endorsing and adopting sectoral standards such as the Inter-Agency Standing Committee (IASC) Minimum Operating Standards on PSEA and the Core Humanitarian Standard. These are described in **Box 6** below.

4.8 Efforts have been made to include the voices of victims, survivors and whistleblowers, notably through a 'listening exercise'[38] held prior to the London summit, a survivor engagement meeting hosted in March 2019 to "get views on how best to engage further with victims and survivors as we develop policy and initiatives",[39] and engagement with individual whistleblowers. As part of its due diligence processes, FCDO also requires partners to include victims and survivors in the design, implementation and monitoring of programmes and systems targeting SEA, and monitors whether this is taking place.[40]

4.9 At country level, we heard that FCDO is engaging with mechanisms like the Refugee Engagement Forum in Uganda. However, those most likely to be affected by SEA are also those least likely to have access to or make use of these mechanisms, since they are often vulnerable, disempowered and perhaps afraid to express concerns or make their voices heard. Moreover, cultural sensitivities can preclude these kinds of issues being discussed in an open forum. In Yemen, for example, we heard that partners struggle to broach the subject of gender-based violence due to cultural sensitivities and conflict dynamics.

> "The tools and frameworks partners are using are not localised and not aligned with the local context. Before the war, we had some flexibility to do gender work. Today that space has closed... talking about gender, to support women, there are ways it can be done to bypass some of the political issues. If you start talking about enhancing women's capacity at the household level, they will accept this talk. They will not accept talk of women's empowerment in isolation. Thinking outside the box about how you do this is not there."
>
> Gender expert, Yemen

4.10 FCDO makes efforts to be present and to understand the conditions in which partners work and in which people affected by crisis live. In Bangladesh, for example, we heard from partners that an FCDO staff member regularly visited the camps to observe activities and monitor how partners were delivering on their commitment to provide opportunities for affected people to give feedback and make complaints. Such engagement from FCDO as a donor is valuable and complements the continuous presence provided by implementing partners. Being less frequently present, donors are less able to reach at-risk

[38] *Sexual Exploitation, Abuse and Harassment (SEAH) in the International Aid Sector, Victim and Survivor Voices: Main Findings from a DFID-led Listening Exercise*, DFID Safeguarding Unit, October 2018, link.
[39] *DFID progress on delivery of the donor commitments from the October 2018 London Safeguarding summit*, DFID, 19 October 2020, link.
[40] *Applying a Survivor-Centred Approach to Preventing and Responding to SEA*, internal guidance note, FCDO.

community members and gain their trust. However, in some contexts, their engagement with at-risk community members could garner unwanted attention, particularly in contexts where women have less power and fewer rights and where risks for victims and survivors of SEA are consequently very high.

4.11 Like other donors, FCDO requires partners to consult with affected people and to address their feedback and complaints. Information from these consultations is sometimes shared with the donor, but this is not systematic. FCDO's programme and partner management systems and stakeholder consultation include opportunities to learn, but FCDO does not have a system to ensure that this experiential learning on SEA is used to improve not only partner programming but also the department's own strategy and approach.

Box 6: International standards on PSEA

FCDO has aligned its expectations of partners with the IASC Minimum Operating Standards on PSEA[41] and the Core Humanitarian Standard on Quality and Accountability (CHS).[42]

The four pillars of the **IASC Minimum Operating Standards on PSEA** relate to:

- **Management and coordination:** ensuring PSEA policies and standards of conduct are developed and effectively implemented, establishing cooperative arrangements whereby partners can signal their written agreement to abide by the standards, and having a dedicated department / focal point committed to PSEA.
- **Engagement with and support of local communities** through establishing communication from headquarters to the field on how to (a) provide information to affected populations on their right to be protected from SEA, and (b) establish effective community-based complaints mechanisms.
- **Prevention:** (a) mechanisms to ensure staff awareness on SEA, including through induction and refresher training, and (b) effective recruitment and performance management, including requiring new hires to sign the code of conduct and committing to improve systems of reference checking and vetting for former misconduct.
- **Response:** ensuring internal complaints and investigation procedures are in place, with investigations undertaken by experienced and qualified professionals.

The **Core Humanitarian Standard on Quality and Accountability** sets out nine commitments and quality criteria that can be used to improve the quality and effectiveness of humanitarian assistance delivery, and improve accountability to communities and people affected by crisis.

How FCDO has adopted these standards

FCDO has incorporated these standards in its staff code of conduct and in its policies and procedures for suppliers. FCDO's enhanced due diligence procedures require compliance from partners on standards in six areas: safeguarding, whistleblowing, human resources, risk management, code of conduct, and governance and accountability. Standards are also embedded in the supply partner code of conduct,[43] supplier contract documents and memoranda of understanding with different multilateral agencies. FCDO notes in its enhanced due diligence guidance that it applies proportionality to its assessment of partners' efforts. This acknowledges the need for continuous improvements, even when a basic standard is met, and that smaller partners may struggle to fully implement measures in all areas.[44]

The UK has adopted a wide-ranging strategy of seeking change both at the international and delivery level, but a disproportionate emphasis on systems may be resulting in slower change for affected people

4.12 Updating requirements to ensure partners meet minimum standards for PSEA, in line with the CHS and IASC Minimum Operating Standards (see **Box 6**), has been an important part of the FCDO's approach

41 *Minimum Operating Standards, Protection from Sexual Exploitation and Abuse by Own Personnel*, IASC Protection from Sexual Exploitation and Abuse Task Force Members, 2012, link.
42 *Core Humanitarian Standard on Quality and Accountability Updated Guidance Notes and Indicators*, CHS Alliance, Groupe URD, Sphere Association, 2018, link.
43 *FCDO Supply Partner Code of Conduct*, FCDO, September 2020, V1.0, link.
44 *FCDO Due Diligence: Safeguarding for external partners*, DFID, Updated 14 January 2022, link.

for affecting change to the delivery of humanitarian assistance in-country – referred to as the 'delivery level'. Several stakeholders expressed concern that the emphasis on compliance with standards risked creating a 'tick box' approach, with partners more concerned about showing donors that systems are in place than ensuring they are effective. However, we saw no evidence that partners are failing to take this seriously. On the contrary, there was evidence that attention to SEA had increased at all levels of the delivery chain, including both NGO/CSO and private sector service providers, over the review period.

4.13 FCDO has made substantial investments to improve PSEA in the wider humanitarian system – the 'international' or 'systemic' level – including through training and guidance and establishing more effective systems for information sharing. This is a highly relevant approach because it uses the UK's influence and convening power to create systemic change that will ultimately have the broadest possible impact. However, it takes time for changes at the international level to be fully implemented in country, including ensuring adequate training and support to staff working in the most remote locations. Moreover, some projects have taken time to gain traction, as illustrated by the slow rollout of initiatives to block perpetrators from accessing employment in the humanitarian sector or efforts to promote a more accountable humanitarian culture. FCDO should look at what more immediate efforts can be undertaken at the delivery level to prevent abuse in the short term while systemic approaches are bedding in.

4.14 An additional risk of focusing on system-wide change is that it reinforces what is already a top-down culture in the humanitarian sector, in which funding, learning and systems are pushed from the centre to the periphery. Coupled with the importance of compliance with minimum standards, this puts a heavy emphasis on accountability towards donors, which leaves less time and space for accountability to people from affected communities, particularly for smaller organisations with less capacity. This may in turn hinder the inclusion of voices from trusted local rights organisations, women's groups and other community actors who are more connected with the needs of affected people and victims and survivors. This tilting of the balance of FCDO's approach not only risks reducing the centrality of affected people, victims and survivors in humanitarian response, but also works against other UK commitments, notably towards the localisation of humanitarian response.[45]

4.15 FCDO has invested substantially in the creation of a Safeguarding Investigations Team (SIT), which sits in the Internal Audit and Investigations Directorate. Formed in January 2019, SIT has a mandate to ensure an appropriate survivor-centred response to safeguarding incidents involving members of staff and FCDO funding. Under this system, all concerns are routed through a central reporting system and are triaged on the basis of risk. Where deemed appropriate a new case is opened, with each case allocated a priority rating based on the level of risk to FCDO. The case is allocated to a dedicated case manager in SIT, and this case manager then works with partners and programme teams to progress the case. In this way, SIT directly investigates priority cases and provides oversight of partners' investigations.

4.16 Our review found that FCDO had made a serious and much-needed effort to provide real accountability when complaints are made in UK-funded programmes. However, improved targeting and fine-tuning of systems is required to ensure that the department focuses on SEA perpetrated against people accessing humanitarian assistance. Our study showed that FCDO's wide definition of safeguarding, extending beyond SEAH, coupled with the way it filtered and selected cases for follow-up, means that SIT has been overwhelmed with cases, most of which are workplace misconduct issues between staff including, but not solely comprising, sexual harassment. In seeking data for our case study, the structure of the case management system made it difficult to search for cases involving affected populations. This limited FCDO's ability to focus on those most vulnerable to SEA. We note that FCDO responded to our questions on this by adjusting its case management system.

4.17 While global reporting of SEA cases by affected people, victims and survivors has somewhat increased, there is widespread agreement that it remains substantially under-reported. This provides a strong

[45] The UK is a signatory to the Grand Bargain, a set of commitments by some of the largest donors and humanitarian organisations at the World Humanitarian Summit in 2016 to get more means into the hands of people in need and to improve the effectiveness and efficiency of humanitarian action. This includes commitments under workstream 2, to provide "more support and funding tools for local and national responders", often referred to as 'localisation of humanitarian action', link.

indication that the FCDO's strategy is not effecting change quickly enough at the delivery level. Our surveys and interviews with members of crisis-affected communities in Uganda and Yemen found that although most people expressed a willingness to report and said that they have confidence in agencies to respond well, reporting is still very low. This includes in areas where people said they were aware that SEA was taking place and even that it was common.

4.18 Although FCDO has been encouraging partners to improve outreach to affected populations and opportunities to give feedback, our surveys suggest that there has not been a significant increase in either Uganda or Yemen. In both countries, we heard there was a clear preference for reporting to local community leaders, elders or authorities. This suggests that there remain important barriers to reporting that are not being addressed. FCDO should work with others to develop a sound and specific understanding of local barriers to reporting, and adjust reporting channels accordingly. This is discussed in greater detail under effectiveness.

4.19 ICAI's engagement with affected populations in Uganda also found that the type of abuse most cited by respondents was in connection with recruitment: "aid workers asking for sex in exchange for getting or keeping a job". The control of access to employment as a tool for exploitation was also central to the recent SEA scandal in the DRC. However, we did not hear of any work being done to investigate or address this issue in greater detail.

> "People have applied for these jobs for NGOs within the communities. And you see that someone eagerly wants a job. But if the person interviewing admires the person, they would call the person maybe a day before the interview, to ask for sex. If you fail, you also fail the interview."
>
> Member of affected community, Northern Uganda

The UK has invested in a wide range of appropriate measures to develop the international aid sector's capacity and capability, and to build the evidence base, but this requires a more strategic approach

4.20 FCDO has correctly identified the need to provide less well-resourced organisations, such as CSOs, with better access to technical resources and support. However, tools like the Resource and Support Hub (RSH) and the Open University Introduction to *Safeguarding in the International Aid Sector*[46] training course need further promotion to their intended audiences with resources made available in more languages. We found that international actors, particularly those based in the UK, were generally aware of these, but grassroots actors in the case study countries were not. Moreover, the establishment of the RSH as a new and separate platform from that of the IASC risks creating confusion for partners on where to look for information.

4.21 FCDO has also identified the need to improve the evidence base on where, when and how SEA takes place in humanitarian contexts, and who is most at risk. FCDO has invested in a number of evidence products, including the *Global Evidence Review of Sexual Exploitation and Abuse and Sexual Harassment in the Aid Sector*, published in January 2021, and engages with others who are working on addressing knowledge gaps. However, to date a strategic research agenda has not been developed to address the most urgent evidence gaps, particularly those that will contribute to developing more specific and targeted prevention and response measures.

Conclusions on relevance

4.22 The UK has developed a wide-ranging strategy for safeguarding in the international aid sector based on extensive consultation with a broad range of stakeholders. The strategy includes both financial commitments and investment in influencing, targeting prevention and response. It reflects concern with short- and longer-term change at both delivery and systemic levels. However, the emphasis on

[46] *Introduction to Safeguarding in the International Aid Sector, online training course*, The Open University, accessed via link.

compliance and top-down measures risks partners investing more time and energy in accountability towards the donor rather than towards affected people. Moreover, the UK approach to safeguarding would benefit from a more systematic use of information drawn from consistent consultation with affected people. Similarly, FCDO's case management system was unable to prioritise victims and survivors from affected populations due to the way that cases were selected and filtered. Finally, the portfolio would benefit from attention to specific situations that render people more vulnerable to SEA, such as prospective employees in the context of in-country recruitment, and to opportunities for improvement, such as developing stronger reporting channels in collaboration with community leadership. We therefore award an **amber-red** score for relevance

Coherence: How well does the UK work with other donors and multilateral partners to ensure a joined-up global approach to PSEA?

Coherence with the wider humanitarian sector, initially weak, has consistently improved and FCDO investments have been instrumental in strengthening coordination on PSEA in the sector

4.23 When the UK government first scaled up its work on PSEA in the humanitarian sector in 2018, it had a steep learning curve and drew on domestic safeguarding policy and practice, which does not entirely align with the wider humanitarian sector. FCDO learned rapidly from partners in developing its approach both internally and externally. The UK now works within existing sectoral standards, adopting and endorsing the Core Humanitarian Standard on Quality and Accountability (CHS), for example, and drawing on learning from the CHS and others in the development of internal systems and guidance, including due diligence and investigations guidance.

4.24 The UK has worked collaboratively with a range of implementing partners, donors and other actors to help increase coherence across the humanitarian system and drive up standards. The UK contribution to the development of the OECD DAC *Recommendation on Ending Sexual Exploitation, Abuse, and Harassment in Development Co-operation and Humanitarian Assistance* is a particularly important contribution to building coherence in the sector. FCDO is working with other donors to standardise requirements, which will help reduce duplication and focus the work of implementing partners. In the interim, a partner organisation in Bangladesh told us that FCDO has been willing to accept that partners report on PSEA using different reporting templates and formats as long as the standards are aligned with FCDO's requirements. This is logical, as FCDO's standards are aligned with the CHS and IASC Minimum Operating Standards, allowing for commensurability.

4.25 Our review of various different types of funding arrangement showed that safeguarding standards are generally applied consistently across funding streams, with only small areas of variation remaining. Partners were aware of their responsibility to ensure that their downstream partners were adhering to minimum standards, including NGOs, CSOs, private sector actors and government. In contexts like Bangladesh, FCDO also supports coherence in application of standards across all partners by investing in interagency mechanisms for coordination on PSEA. In Bangladesh we heard that this was reinforced through consistent, supportive engagement in areas where humanitarian assistance was being delivered and in coordination meetings.

The UK has created an effective network but lacks sufficient representation from victims and survivors

4.26 In advance of the London summit, the UK created a network of consultation mechanisms. This has largely been maintained since, in particular through the Cross-Sector Safeguarding Steering Group (CSSG), an "informal and safe space for organisations to report back on progress, share best practice, opportunities and challenges, and increase coherence across the sector".[47] The CSSG includes representatives from the eight groups or organisations that made commitments at the London summit in 2018, as well as independent voices. Representatives from bilateral donors and multilateral organisations told us they valued the CSSG as an effective mechanism for sharing information and improving coherence.

[47] *Cross-Sector Progress Report on Safeguarding Against Sexual Exploitation, Abuse and Sexual Harassment (SEAH) 2019-2020*, FCDO, October 2020. Accessed 21 November 2021, link.

Other donors and partners appreciated how the UK has used its convening power to maintain coordination between diverse actors. The UK's commitment to maintaining momentum on addressing PSEA, not only through political influence but also through practical coordination, administration and reporting, was also highly appreciated.

4.27 We are concerned, however, that not enough is being done to engage victims and survivors and ensure that their voices are heard. A follow-up to the listening exercise held prior to the 2018 London summit was planned for 2021 but has been delayed. It is not clear if or when it will take place. Moreover, such high-level forums struggle to capture in real time the concerns of those most at risk. Even country-level mechanisms like the Uganda Refugee Engagement Forum take place at such a senior level that it is difficult for those most vulnerable to exploitation and abuse to be heard. Although we are aware that FCDO engages in many such forums and receives regular updates from partners, there remains a need for a more systematic way of ensuring that feedback from affected communities, victims and survivors informs policy.

Weak systems for global and operational data sharing undermine transparency and accountability

4.28 Notwithstanding the efforts to increase coherence described above, important gaps and inconsistencies remain in how information is shared. This undermines the effectiveness of efforts to prevent and respond to SEA. Timely sharing of data on cases is essential to understand when, where and how exploitation and abuse is taking place and how to reduce risk to vulnerable people. UN agencies have developed a system for sharing this data which, while not perfect, is helpful in allowing some analysis to take place. However, other partners are not doing this systematically, a gap which was also noted by the IDC in its 2021 report.[48] The result is that data are being shared inconsistently at a global level.

4.29 This incoherence is also visible at the national level, undermining accountability to affected people. In Bangladesh, for example, we heard that partners' concern with confidentiality for victims and survivors meant that they were reluctant to share information in real time with the PSEA Network/ Coordinator, making it more difficult to use this information to rapidly assess and address protection gaps. Ironically, we found that donors' stringent reporting requirements, aiming at increasing accountability and transparency, meant that they sometimes received reports that the humanitarian coordination mechanisms did not. The FCDO and other donors should be vigilant regarding unintended consequences of their reporting requirements, and prioritise improving communication and coordination in the system over creating a private reporting channel.

4.30 While part of the problem is organisational reluctance to publish information that may be harmful to their reputation or funding base, the main problem is partners' difficulty in navigating their responsibilities with regard to privacy and data protection. FCDO has recognised this problem and invested in finding solutions, resulting in an internal concept note on *Sexual Exploitation and Abuse and Sexual Harassment (SEAH) Data Collection and Reporting in the Aid Sector*. It is an ambitious programme of work, including reviewing and mapping of existing SEAH data collection and reporting systems, developing a broad standardised framework for SEAH data, and establishing a SEAH data information management system. This will require backing and investment across the international aid sector before it can be fully implemented.[49]

Conclusions on coherence

4.31 The UK has invested in developing and maintaining an extensive network to guide its approach to PSEA, which has required flexibility and a willingness to adapt its approach in alignment with already identified best practice and standards. Other actors appreciate the UK's use of its convening power and resources to develop greater coherence in virtually every aspect of work in this area, including standards on prevention and response, reporting and information sharing, and investigations. Important areas remain where the coherence of the international effort has not yet been fully delivered, for example on data sharing, but this is an area where the UK government has shown strength and leadership. We therefore award a **green-amber** score for coherence.

[48] *Progress on tackling the sexual exploitation and abuse of aid beneficiaries*, Seventh Report, International Development Committee, 14 January 2021, link.

[49] At the time research for the review was being conducted, this work had not progressed. ICAI was subsequently informed that phase 1 of the SEAH data project was completed in September 2021, with a final report published in December 2021 and a timeline defined for the next phase.

Effectiveness: how effective is the UK's approach to PSEA at programme, delivery partner and sector-wide levels?

Reinforcement of minimum standards has improved consistency and delivery in prevention and response, but lack of funding undermines effectiveness, particularly for smaller organisations

4.32 Since 2018, FCDO has taken measures to ensure that its staff and partners are consistently held to a minimum standard on SEA. Internally this has been accomplished through the establishment of governance and management structures to monitor change. The Safeguarding Delivery Board provides leadership, direction and oversight, while the Safeguarding Unit delivers on the strategy and the Safeguarding Investigations Team (SIT) investigates and oversees investigations of cases. FCDO has built risk management capacity within the organisation but acknowledges that, despite an increase in SEA risks logged in risk registers following enhanced due diligence (see **Box 6**), in some cases fewer risks are being reported than would be expected given their operating context.

4.33 All FCDO personnel undertake mandatory e-training on SEAH to ensure that all staff have a basic understanding of safeguarding. Additional role- or sector-specific training is provided as required. A 'Safeguarding Week' is held annually, bringing together safeguarding champions and other staff for seminars, training and information sharing, providing them with support and helping to maintain the profile of the issue within the organisation. The presence of a humanitarian adviser in the Safeguarding Unit has been important for tailoring and contextualising PSEA efforts to humanitarian work.

4.34 A Safeguarding Champions Network has been established to provide localised support. It currently has more than 85 members of staff at different levels of seniority, including leaders and managers, technical advisers and programme managers, among others. Champions are responsible for acting as liaisons on safeguarding, raising awareness, and sharing information and learning across the network. This is not a full-time role, but complements other activities, and managers are expected to adjust their workload to accommodate the extra work. This approach means that the champions' work is integrated into FCDO's work, rather than taking place on parallel tracks. We found that the network performed an important day-to-day role of providing contextualised support and ensuring safeguarding remains on the agenda.

4.35 The merger of the Department for International Development (DFID) with the Foreign and Commonwealth Office (FCO) has provided both challenge and opportunity. Since FCO had lower standards on safeguarding, time and energy have been invested in levelling these standards up, but work remains to be done to ensure consistency across the department.

4.36 Externally, FCDO has taken measures to reinforce humanitarian sectoral standards, including through funding the Core Humanitarian Standard's Protection from Sexual Exploitation, Abuse and Harassment (CHS PSEAH) Index,[50] and to incorporate these standards into its own systems. FCDO's requirements for delivery partners and programmes involving UK funding include rules managing risk and implementing prevention and response measures. These have been applied across the programme operating framework, which sets the standard for how FCDO programmes and projects are delivered, including internal control and accountability and the enhanced due diligence system.[51] Humanitarian business cases include explicit commitments to minimum standards on prevention of and response to SEA including programme-specific (earmarked) and core funding for UN humanitarian agencies, the International Committee of the Red Cross and the International Federation of Red Cross and Red Crescent Societies. Internal audits look at delivery on commitments at central and local levels, and across the supply chain.

4.37 We found evidence of these changes at country level in our country case studies, and found that prevention of and response to safeguarding and PSEA was increasingly addressed in programme documents after 2018, including as new additions to business cases for existing programmes. Evidence from the three country case studies showed that these standards are being passed on to downstream

[50] *PSEAH Index* – English, CHS Alliance, accessed 21 November 2021, link.

[51] *Safeguarding against Sexual Exploitation and Abuse and Sexual Harassment (SEAH) Due Diligence Guidance for FCDO implementing partners*, FCDO, December 2021, link.

partners and sub-contractors. This includes civil society and private sector actors such as international financial institutions that are key partners in social welfare programming in many contexts. While only a small sample of documents were reviewed and downstream partners interviewed, there was evidence that the application of standards is being reinforced by training. Downstream partners reported that FCDO's support is leading to an increase in their awareness and capability at field level.

4.38 For partners to implement FCDO's increased requirements, additional investments have been necessary in training, monitoring, establishment and maintenance of complaints mechanisms, and investigations. FCDO has been inconsistent in making funding available for these costs. The expectation is that partners will meet most of these costs through 'cost recovery' – typically a percentage of the total cost of a project, used to cover indirect costs such as administration, fundraising and other overhead costs. Meeting the minimum standards on PSEA has implications for staff recruitment and training, which are generally funded from cost recovery, as well as the additional cost of establishing mechanisms for receiving and processing complaints and conducting investigations. However, there has been no increase in the amount that partners are able to claim, meaning they are required to do more with the same amount of money. FCDO has told partners that they can, and where necessary should, include costs for safeguarding within funding bids. However, not all of the costs can be met in this way and during our review we found one case in which FCDO had refused to grant a small amount (1%) for safeguarding, suggesting that this message has not reached all parts of the overseas network. Importantly, downstream partners are the last in line for funding and the least likely to be able to cover the additional costs related to prevention of SEA. These partners typically have the least robust systems in place and work most closely with affected people.

4.39 Moreover, although FCDO has expressed its commitment to maintaining safeguarding as a priority in the face of reductions to the UK aid budget, these reductions are likely to have consequences for safeguarding on several levels. For example, we heard from one partner that reductions to their funding have already meant cancelling a planned piece of targeted work on safeguarding. Moreover, the knock-on effects of reductions in funding may contribute to increased risk and reduced capacity. For example, reduced funding for programmes meeting basic needs is likely to increase the vulnerability of affected people to exploitation while decreasing protection capacity. Similarly, evidence suggests that reduced presence of aid workers in areas of humanitarian crisis, including due to COVID-19 restrictions, had resulted in increased rates of SEA and reduced reporting.[52] The reasons for this are unclear, but it is perhaps due to reduced oversight. Several partners cautioned that aid budget reductions may also affect UK influence and consequently its ability to keep safeguarding on the agenda, both internationally and in local contexts.

> "...actually this condition of the lockdown has increased the cases of sexual abuse and the lockdown has brought in high cases of lack of jobs."
>
> Member of affected community, Northern Uganda

Despite increased awareness of and attention to SEA and increased work to encourage reporting of cases, reporting remains low, particularly among affected populations

4.40 FCDO requires partners to ensure that mechanisms to report SEA are in place in all programmes that it funds, and to share all reports. The department says there has been an upward trend in reports of SEAH, from 41 in 2017-18 to 143 in 2018-19, 206 in 2019-20 and 214 in 2020-2021. It adds that this has allowed it to use data to identify potential problems based not only on where there are high numbers of reported cases, but also where there are too few. This is progress, but it is impossible to know what percentage of

[52] *COVID-19 pandemic has amplified the risks of vulnerable children to trafficking and sexual exploitation*, Special Rapporteur on the sale of children tells Human Rights Council, United Nations Office of the High Commissioner for Human Rights, 2 March 2021, link. Also *Prevention of Sexual Exploitation, Abuse and Harassment (SEAH) during the COVID-19 pandemic*, webinar, Resource and Support Hub, 9 June 2020, link.

actual cases such reports represent, and there is general agreement that under-reporting has been and remains a significant problem.[53]

4.41 Our review of FCDO data and country case studies found significant discrepancies in reporting levels from one location to another, which is more likely attributable to contextual factors and hesitation about reporting than to an absence of SEA. In Uganda, ICAI's telephone survey of people in areas of humanitarian response showed that 44% of respondents said they were aware of instances of SEA by aid workers happening in their community or area, with 32% reporting that this was because either they or a friend or family member had witnessed or experienced it themselves. However, people appear to be unwilling to use aid agency reporting or referral mechanisms, stating a preference for reporting to community leaders and elders or, less frequently, the police and local authorities. The UNHCR complaints mechanism in Uganda reported similarly low numbers.[54]

4.42 ICAI's telephone survey conducted in Yemen found even stronger reluctance to report SEA. In our interviews with implementers working in Yemen we heard that it is difficult for them to discuss issues relating to gender and women's safety due to prevailing social norms. This may have contributed to the fact that only one of 307 people interviewed said they were aware of irregularity or misconduct of any kind by aid workers, with that one case being an issue other than SEA. However, there is widespread agreement that SEA is taking place.

> "Women are sometimes exposed to harassment by the workers... Local NGOs are involved, government, international organisations – who do we raise it to when they are all involved?"
>
> Yemeni woman

4.43 In Yemen, like Uganda, a significant majority of people interviewed – 92% – said they were willing to report SEA, but there was a striking gendered difference in levels of confidence that appropriate action would be taken, with 70% of men and 52% of women saying they felt that agencies would listen and take reports seriously.

4.44 Our analysis of cases reported to FCDO's SIT shows that the proportion of these cases involving affected populations is relatively small. Of a sample of 318 safeguarding cases selected for review, only 45 involved sexual abuse of affected populations,[55] with the rest relating largely to complaints of misconduct between staff.[56] Only six of these reports were from humanitarian settings. It should be noted that the low level of reporting through FCDO channels is unlikely to reflect actual levels of SEA taking place against affected populations in humanitarian settings. Data on prevalence is weak and reporting in humanitarian settings remains challenging. Our community engagement found that the type of abuse most cited by respondents in Uganda was in connection with employment: "aid workers asking for sex in exchange for getting or keeping a job". It may not always be clear to new recruits how they can report SEA, and those in need of scarce, well-remunerated work may be disinclined to do so.

4.45 UN data shows an increase in reporting since 2017, but it is not clear how many of those reports originally stem from affected populations. There is general consensus that cases of SEA against affected people remain under-reported.[57] One explanation for under-reporting could be a lack of confidence that aid

53 *Global Evidence Review of Sexual Exploitation and Abuse and Sexual Harassment (SEAH) in the Aid Sector*, Feather, J., Martin, R. and Neville, S., Safeguarding Resource and Support Hub, January 2021, link.

54 As of August 2021, the UNHCR dashboard records just 26 cases in relation to PSEA since 2018. United Nations High Commissioner for Refugees (2021) Uganda Comprehensive Refugee Response Portal, link.

55 The sample of 318 cases comprised the total number of cases reported in 2017-18, 2018-19, 2019-20 and 2020-21 in our case study countries: Bangladesh (240), Uganda (67) and Yemen (11). Of the 45 cases of inappropriate sexual behaviour towards members of affected populations recorded across all four years in our three case study countries, 20 were reported from Bangladesh (including 8 cases classified as SEA and 12 cases classified as SH), 23 were reported from Uganda (including 20 cases classified as SEA and <5 cases classified as SH), and <5 were reported from Yemen (which were classified as SH). We counted all inappropriate sexual behaviour to affected people in our numbers irrespective of how FCDO labelled them.

56 FCDO notes that some of the cases involving misconduct relating to staff include cases where staff members come from affected populations. ICAI was unable to verify this point as FCDO did not provide a breakdown of the number of such individuals included in the staff cases, nor any details about the cases to show how their work status conformed with ICAI's definition of locally hired workers, namely incentive workers or volunteers, as per footnote 6.

57 *Global Evidence Review of Sexual Exploitation and Abuse and Sexual Harassment in the Aid Sector*, Feather, J., Martin, R. and Neville, S., Resource & Support

organisations will address cases in a just, safe and effective manner, but our community engagement in Uganda and Yemen indicated that in these two contexts, lack of confidence in aid organisations was not the main reason. More engagement at the grassroots level is required to identify the barriers to reporting and how to improve accessibility, acceptability and effectiveness of reporting systems for all people affected by humanitarian response.

4.46 In interviews, a number of agencies told us they were required to report cases to FCDO within 24 hours, expressing concern that this was not consistent with a survivor-centred approach. However, FCDO told us that the 24-hour reporting timeframe is not FCDO policy. This widespread misperception may indicate that agencies are confusing other policies with those of FCDO. We heard that agencies' internal systems sometimes have this timeframe on reporting, and we saw local standard operating procedures that require victims and survivors of SEA to be provided with support or referral services within 24 hours. This feedback suggests a need for FCDO to ensure that partners and others understand its requirements so that misunderstandings or unintended consequences are avoided.

4.47 When affected people are unwilling or unable to report, whistleblowers and observers or third parties play an important part in reporting exploitation and abuse. Measures to ensure that people can raise concerns without suffering negative consequences are now standard, and FCDO requires all partners to have whistleblowing policies and systems in place. However, evidence shows that these mechanisms are often not used. People often lack confidence that action will be taken as a result of their report, or that they will be safe from retaliation.[58] FCDO told us they contributed to learning about whistleblowing by commissioning Keeping Children Safe[59] to carry out safeguarding-specific central assurance assessments, and by supporting and learning from individual cases of whistleblowing. They also financed production of *Whistleblower Protection Guidance* by the CHS Alliance.[60]

4.48 Addressing the problem of SEA cases going unreported entails not only strengthening reporting systems, but also changing the culture around them. FCDO has directly invested in measures to begin this cultural shift in the humanitarian sector, including supporting the development of the Bond[61] culture change toolkit. This tool aims to support leaders of both large and small organisations to understand what a positive safeguarding culture looks like, to assess their own organisation and to take action to strengthen their institutional culture. There is some anecdotal evidence that this is having an effect, notably through increased training provided by organisations to their staff and a perception that levels of awareness of SEA among organisations' staff members is now higher. However, more robust findings are difficult to evidence in the absence of clearly defined and monitored indicators with established baseline data. Organisations should work to establish baseline data and targets, but it is important to note that real cultural change takes time to deliver.

> "Yeah, things got better because at least now, you know, sexual exploitation has been a crime for a long time now. Over the years I feel like the agencies have taken it upon themselves to put restrictions, some rules and regulations governing the organisations so that the employees know that if I do this, if I'm caught in this, these are the consequences, I'm going to lose my job."
>
> Member of affected community, Northern Uganda

Hub, January 2021, link.

58 *Effectiveness of Whistleblowing Approaches*, Fraser, E. and Naidu, V., VAWG Helpdesk Research Report No. 168. London, UK: VAWG Helpdesk, 2018.

59 Keeping Children Safe is a global network of humanitarian and development organisations established in 2001. It aims to protect children by developing and promoting safeguarding standards. See *Summary of findings from central assurance assessments of DFID partners*, Keeping Children Safe, 20 August 2020, link.

60 This guidance was published as this ICAI review was being written. *Whistleblower protection guidance*, CHS Alliance, November 2021, link.

61 Bond is a UK network for organisations working in international development and humanitarian aid. Bond has more than 400 organisational members, and engages in information sharing, capacity building and advocacy, link.

4.49 Evidence shows that SEA is rooted in inequality and thrives in contexts of corruption where there are multiple forms of abuse of power, including those related to gender, race, ethnicity, and economic inequality.[62] Consequently, it is important to address abuses of power not only in the humanitarian sector but also within local communities, and to tackle structural drivers of SEA and the culture of impunity that accompanies it wherever they are found. Humanitarian agencies noted that it can be difficult for them to tackle this, particularly when alleged perpetrators enjoy power and status conferred by roles in partner government ministries, such as health or refugee affairs, and that more government-to-government engagement on this would be welcome.

4.50 FCDO noted that it addresses these issues of inequality, power and governance through political, governance and longer-term development work, including raising issues of abuse of power with national and local governments. The department also pointed to programmes in Syria and South Sudan that specifically aim to improve safeguarding in national institutions. These include the Syrian Education Programme, which works with the Syrian Education Directorates to agree policy on handling of SEAH cases, how to report cases and lines of accountability, ensuring that sanctions to perpetrators are fair and uniform, and that survivors and their families receive the appropriate support. FCDO also highlighted work through the Girls' Education South Sudan programme to develop a joint safeguarding strategy with the Ministry of General Education and Instruction for programmes supporting schoolgirls.

Initiatives to prevent perpetrators from reoffending have inherent limitations and are not yet showing substantial impact

4.51 FCDO has invested significant resources and influencing efforts in different initiatives to prevent perpetrators from reoffending. These are described in **Box 7**. Most of the UK's investment has been in two initiatives: the Aid Worker Registration Scheme, which aims to provide a record of aid workers' work history, and Project Soteria, an initiative with INTERPOL that aims to reduce access to employment in the aid sector for sexual offenders by promoting better coordination between international law enforcement agencies and the humanitarian and development sectors. Since 2018, FCDO also sits on the Steering Committee of the Misconduct Disclosure Scheme (MDS) and has recently provided funding for a staff position dedicated to this scheme. The MDS is an initiative of the Steering Committee for Humanitarian Response (SCHR), an alliance of major humanitarian agencies, and aims to encourage the sharing of information about individual recruits' sexual misconduct between aid organisations. The three initiatives are intended to be complementary.

4.52 Of these three initiatives, only the MDS is presently operational.[63] It has taken the programme time to gain traction. Organisations are hesitant to share information on misconduct cases if allegations could not be substantiated, or may be unable to provide information if an alleged perpetrator terminates their contract before an investigation is completed. Legislation also differs from country to country, making coherence challenging. Despite these challenges, the SCHR reports that more than 122 organisations are now implementing the scheme, with nearly 10,700 requests for misconduct data made between 2019 and 2021, resulting in 77 hires being rejected based on negative or absent misconduct data.[64] Critics note that uptake has actually been poor relative to the expressed ambition,[65] but the SCHR notes that it has taken time for the MDS to gain traction. This is now picking up pace, including coordination with other systems, notably with the Clear Check system which performs a similar function for UN agencies, funds and programmes.[66] Project Soteria and the Aid Worker Registration Scheme are only now preparing to begin implementation, citing the importance of addressing these issues methodically, given the complexity of some of the challenges.

62 *Global Evidence Review of Sexual Exploitation and Abuse and Sexual Harassment (SEAH) in the Aid Sector*, Feather, J. et al, RSH, 2021, link.
Sexual Exploitation and Abuse in Peacekeeping Operations: Improving Victims' Access to Repatriation, Support and Assistance, Ferstman, C., The Redress Trust, 2017, link.

63 We were informed that Project Soteria will become operational in March 2022.

64 *Implementation data*, Steering Committee for Humanitarian Response, link, accessed January 2022.

65 *Aid charities shun government-backed scheme for tackling abuse*, Hargrave, R., Civil Society News, 9 March 2021, link.

66 *Briefing Note on Clear Check*, UN System Chief Executives Board for Coordination, 21 May 2021, link.

Box 7: Employment screening schemes

FCDO is supporting the development of three employment screening initiatives for adoption by the sector.

Project Soteria	In partnership with FCDO, INTERPOL and the UK criminal records body ACRO, Project Soteria is an initiative that seeks to develop mechanisms for safer recruitment of staff in the international aid sector, and prevent sexual offenders from using positions in the sector to access and offend against children and vulnerable adults. It focuses on using INTERPOL's tools and services to enable international law enforcement coordination and to support wider efforts to limit sexual offenders' access to aid sector positions.
Misconduct Disclosure Scheme (MDS)	Run by the Steering Committee for Humanitarian Response, the Misconduct Disclosure Scheme was launched in January 2019 to address the specific problem of known sexual abusers moving within and between different humanitarian and development agencies. It provides a framework for organisations working in the aid sector to both share information about someone's sexual misconduct during employment via a disclosure form, and systematically check for information of this nature with previous employers relating to potential new hires. The Deputy Head of FCDO's safeguarding unit sits on the MDS Advisory Panel alongside eight other individuals from across the humanitarian sector.
Aid Worker Registration Scheme	Commissioned by the multi-agency Aid Worker Registration Scheme Steering Committee and co-ordinated by FCDO, the Aid Worker Registration Scheme aims to provide a trusted, portable register of people's employment history. This register would prevent perpetrators of SEAH from falsifying their work history or lying about their identity, and could therefore stop them from moving between organisations undetected. A legal review has been conducted, along with consultation with the aid sector, and an initial pilot will run to test the mechanism with a group of INGOs and private sector organisations. If the pilot is successful, the programme will look to scale up the scheme across the UK and internationally, linking with the existing Misconduct Disclosure Scheme and Project Soteria.

4.53 Although these initiatives are relevant, their scope, and therefore effectiveness, is limited. The MDS was described to us as a 'narrow solution to a narrow problem'. In addition to the limitations mentioned above, at present the screening is being used primarily for internationally recruited staff, with only limited use in recruiting staff members at the national level. This is important because staff engaged nationally or locally make up the majority of humanitarian personnel, particularly in roles directly delivering goods and services.[67] From 2021 the MDS coordinators say that they are increasing their efforts to engage with existing PSEA systems in a number of countries, but there are substantial challenges, including differences in and weaknesses of legal systems, limited resources of national organisations, lack of robust human resource practices, and fear of holding up deployments in humanitarian emergencies. For example, in Bangladesh we heard that naming conventions and lack of documentation mean that it can be extremely difficult to be sure that references have been correctly checked.

> "What I always see and hear on the media is that after that they only just apply for a transfer, then they are transferred away, then you will be thinking that they have been expelled or interdicted then somebody is again working from another place."
>
> Telephone survey respondent in Uganda

[67] *The State of the Humanitarian System 2018 – Full Report*, Knox Clarke, P., ALNAP, 2018, link.

4.54 Even if the human resource issues are addressed, however, none of these schemes will ever have the ability to vet community volunteers, local officials, local community leaders or local private sector employees who also have influence over how goods, services and resources are allocated and delivered. It will be important to critically assess the level of effort and investment in these schemes and ensure effectiveness and value for money. While employee screening schemes are a necessary part of the quest to tackle SEA, they can only be a small part of the efforts needed to seek out ways to prevent offenders from abusing positions of power at all levels of the humanitarian system.

The UK is firmly committed to a survivor-centred approach but needs to do more to deliver this for victims and survivors

4.55 The commitment to respond to victims and survivors of SEA with a survivor-centred approach is consistently articulated in FCDO policy – as it is in the PSEA principles guiding the wider humanitarian sector. We found a common understanding of this term within FCDO from headquarters to country level in principle, with most policymakers and practitioners defining a survivor-centred approach as aiming to empower the victim or survivor, prioritise their rights, needs and wishes, and ensure that they have access to appropriate services. However, few were able to describe what a survivor-centred approach looked like in their context, or how it was delivered. FCDO provided us with some examples where specific individual follow-up and support has been provided, but in most cases victims and survivors are referred to existing gender-based violence (GBV) services to avoid exposing them to additional stigma or creating a hierarchy of victims. This approach is consistent with best practice, but these services are often underfunded and can be difficult for people to access. Furthermore, they are often not tailored to the specific needs of victims of SEA. There is often no specific tailored longer-term support for children born of SEA or to victims and survivors who suffer negative personal, social or financial consequences as a result of SEA by humanitarian personnel.

4.56 The UN Victims' Rights Advocate and UN Victims' Rights Field Officers work to provide a more effective response to the needs of victims and survivors and emphasised that meeting their needs is complex, being both highly contextualised and highly individualised. Today UN support to victims and survivors is still delivered largely through community-based projects while learning how to provide more targeted support safely. UN representatives were appreciative of FCDO's financial and political support to their work, including a mapping of victims' assistance and support in 13 countries.[68] The UK was initially criticised for not contributing financially to the UN Trust Fund in Support of Victims of Sexual Exploitation and Abuse,[69] but remedied this in 2020 when it became the Trust Fund's largest donor with a contribution of over $1 million[70].

4.57 We conducted a review of 40 cases reported to FCDO's Safeguarding Investigations Team and found that support was provided to victims and survivors wherever possible. This included medical and legal support, counselling and psychosocial care. It is worth noting that it is not always possible to provide a full range of support, and sometimes victims and survivors do not want to take up the offer.

4.58 As FCDO itself has noted, work to support victims and survivors is complex and requires both consistency and contextualisation. While large single contributions are doubtless welcome, consistent, ongoing contributions from the UK at central and local levels can support advocacy for the rights of victims and survivors and provide tangible redress for harm done in the longer term.

[68] *Mapping of Victims' Assistance*, Office of the Victims' Rights Advocate, United Nations, link.

[69] *Progress on tackling the sexual exploitation and abuse of aid beneficiaries: Seventh Report of Session 2019–21*, House of Commons International Development Committee, 15 December 2020, link; "'Glib': UK criticised for failing to give to fund for survivors of UN sexual abuse", McVeigh, K., *The Guardian*, 13 March 2018, link. This was also noted in ICAI's review, *Sexual exploitation and abuse by international peacekeepers*, September 2020, link.

[70] *Third Annual Report of the Trust Fund in Support of Victims of Sexual Exploitation and Abuse: 2020, United Nations, 2021*, link.

FCDO has made significant investments in investigation and oversight of safeguarding cases

4.59 FCDO has made significant investments in systems for directly investigating reported safeguarding cases involving its own staff and providing oversight to the investigation of cases against staff in projects implemented with FCDO funding. The Safeguarding Investigations Team (SIT) was formed in January 2019 as part of FCDO's Internal Audit and Investigations Directorate and also supports capability building and safeguarding risk assurance. SIT now has a team of nine staff and has added capacity by delegating oversight of some cases to programme teams trained to manage cases through a variety of capacity building and support initiatives.

4.60 The development of a system for handling safeguarding complaints from scratch shows a serious effort to provide a channel for raising concerns. Despite efforts to align systems with the wider humanitarian sector, however, there are still weaknesses in coherence with wider efforts. For example, FCDO's coordination with other donors on investigations is generally limited to information sharing.[71] This can result in additional work for those organisations that report to multiple donors. FCDO chairs a Cross Donor Investigations Group which shares information on best practice.

FCDO's broad definition of safeguarding has caused the Safeguarding Investigations Team to be overwhelmed by cases, making it difficult to differentiate and prioritise cases of sexual exploitation and abuse of affected populations by humanitarian workers

4.61 FCDO's use of a broad definition of 'safeguarding', extending beyond sexual exploitation, abuse and harassment (SEAH), together with the way it filtered and selected cases for follow-up, has also created challenges for investigations. The onus on partners to report all credible safeguarding concerns, means that the investigations system is flooded with reports of many different kinds, including workplace misconduct issues between staff (bullying, harassment – sexual and otherwise) and broader protection issues such as corporal punishment or child labour. It is not evident that managing such cases through FCDO's reporting system is the best way to address them. In the case of workplace misconduct, they may be better addressed through partners' human resource systems.

4.62 We noted that it is difficult within this system to differentiate or prioritise cases of SEA by humanitarian workers towards members of affected populations. FCDO has made some technical changes to the functioning of the system in response to ICAI raising this issue, but there is a need for overall review of how cases are categorised and prioritised.

4.63 The solution adopted for managing the higher caseload of reports resulting from the broad definition of safeguarding has been to delegate responsibility for low- and medium-priority cases to country-level programme teams with a case manager allocated from SIT. The system is still new, and while such delegation will provide additional capacity to the system and greater sensitivity to the context, there are important risks involved in delegating oversight of sensitive investigations to generalist programme staff with already heavy workloads.

4.64 FCDO's internal guidance on investigations and case management has been developed with care and emphasises sectoral best practice in terms of a survivor-centred approach and ensuring the independence of the investigations team. However, our review found several gaps that merit attention. The most important of these was the weakness of internal guidance on protecting whistleblowers and on ensuring due process and protection of the rights of the accused. Both whistleblowing and being accused of SEA have consequences that can change the course of an individual's life. While it is essential that reports are taken seriously, it is equally important that investigations protect the rights of all involved – whether victim/survivor, whistleblower or the accused. Additional guidance on ensuring the independence of all investigations and decision-making processes and on investigation of failures to respond to a complaint is also needed.

[71] ICAI was informed that there were some exceptions to this for significant cases.

4.65 Finally, FCDO's ability to hold partners to account for weak safeguarding practices could be strengthened. While FCDO guidance[72] is clear on partner reporting requirements, the consequences for partners who fail to respond to safeguarding concerns adequately are unclear.

There is some evidence to suggest that the culture of the humanitarian sector is starting to shift in relation to SEA, but there is currently no system in place for measuring change

4.66 Failures to prevent SEA in humanitarian contexts have been attributed to the culture within individual organisations and of the humanitarian sector overall. Profound power disparities and gender inequality contribute to a culture that normalises or turns a blind eye to exploitation and abuse and discourages reporting. Increased attention to SEA in the humanitarian sector following the London summit has led to sustained focus on the topic, but FCDO and other actors in the sector have recognised the importance of taking specific steps to target deeper cultural change. We saw evidence that FCDO is addressing culture change both internally and externally, for example through the Safeguarding Champions Network in FCDO and through supporting the Bond culture change toolkit. However, the absence of baselines and the immaturity of much of the programming makes it impossible to gauge the depth or sustainability of this change.

> "Within the past two years there has been cultural change within the mission, especially with rules and regulations. Now, they put people on admin leave with or without pay and it is a major deterrent which was not there before. We have seen culture change when staff members realised that every single act is going to be punished if substantiated. We have seen cases drop."
>
> UN staff member, Democratic Republic of the Congo

4.67 FCDO has aimed to embed safeguarding into its internal culture through a range of measures which have been mentioned earlier in this report. Particularly important for culture change is the engagement of the leadership both in emphasising the importance of safeguarding and in monitoring delivery through mechanisms like the Safeguarding Delivery Board. The importance of the work has been emphasised by inclusion in processes, training and guidance, and the Safeguarding Champions Network has been particularly highlighted by FCDO personnel as making a positive contribution to increasing awareness and maintaining safeguarding as a live issue at all levels of the organisation.

> "We have seen changes in the culture, thanks to the creation of a safe space, where questions on very difficult subjects can be asked within a very supportive environment, with colleagues who have expertise and experience to support. The Champions are able to have these conversations back in their departments."
>
> Member of the FCDO Safeguarding Champions Network

4.68 FCDO has explicitly aimed at improving the culture of the international aid sector through investment in a tool developed by Bond to support leaders to develop a positive organisational culture. It is too early to assess the impact of this tool, particularly as cultural change takes time to embed, and it was only launched in March 2021. Moreover, as the tool is aimed at the leadership level, it is likely to take time to trickle down to in-country responses, where institutional culture change faces the additional challenge of the wide range of social and cultural norms represented among the diversity of humanitarian personnel. It is important to note, however, that this tool is just one of a number of initiatives in the international aid sector to promote positive practices on culture change.[73]

[72] As shared with ICAI in spring 2021.
[73] See, for example, *A Selection of Promising Practices on Organizational Culture Change*, IASC, May 2021, link.

Stringent reporting requirements are important for tackling SEA, but can also create a 'culture of fear' which undermines transparency and accountability

4.69 The impact of FCDO's stringent requirements around minimum standards and reporting should also be acknowledged as contributing to culture change. Despite concerns voiced by some about creating a 'tick box' culture around safeguarding, these standards and requirements have unquestionably raised the profile of SEA for delivery partners. Moreover, we saw evidence that the work of FCDO's first-tier partners to help downstream partners in the delivery chain comply with requirements also helped the latter to develop their own policies on gender, accountability, and abuse of power.

4.70 However, risks of negative side effects of stringent reporting mechanisms and sanctions need careful handling if the aim of transparency and accountability on SEA is to be achieved. FCDO has recognised that zero tolerance for SEA cases is not possible, and that insisting on such a standard will only result in cases being covered up or ignored. Instead, the department has adopted a policy of zero tolerance to inaction on cases. While partners appear to understand this distinction, the severe financial and reputational damage that organisations have experienced when SEA cases have become public has created what some interviewees described as a 'culture of fear' in the humanitarian sector. While it is vital that organisations understand that there are consequences to failing to prevent exploitation and abuse within their operations, such a culture can work against the UK's efforts to foster transparency and accountability.

Conclusions on effectiveness

4.71 The UK has invested significant political capital and financial and human resources on PSEA. This has resulted in substantial policy and operational changes, which are contributing to increased awareness of the issue, improved reporting mechanisms, and better monitoring of these mechanisms and of staff conduct. However, it is difficult to assess how much impact this has had, particularly as cases of SEA against members of affected populations are still widely believed to be substantially under-reported.

4.72 The implementation period for the government's strategy on safeguarding has been beset by challenges, including a global pandemic that has hampered both the government's and partners' capacity to implement changes and monitor results. It is also important to acknowledge the sensitivity of the topic, which means that time is required to build trust among affected populations and encourage cultural shifts both in the humanitarian sector and more broadly. Nonetheless, we found limited evidence that FCDO efforts have so far had an impact on improving the day-to-day situation for crisis-affected people. This includes evidence of affected people's continued reluctance to report cases of SEA, the minimal progress to date of projects like employment screening schemes, and the lack of evidence of the impact of efforts like the culture change toolkit or capacity-building tools. We therefore award an **amber-red** score for effectiveness.

5. Conclusions and recommendations

Conclusions

5.1 Sexual exploitation and abuse (SEA) in the humanitarian sector has been recognised as a severe problem since the early 2000s. But despite regular scandals creating spikes in interest, the problem was generally allowed to fade into the background. Since 2018, however, the UK government has worked to keep the safeguarding of vulnerable populations against SEA by humanitarian workers on national and international agendas. There are no easy solutions and the problem will take time to address effectively. Continuous effort is needed at international and in-country levels to identify and mitigate risk, strengthen the reporting of cases, stop perpetrators from operating with impunity, and provide real accountability to victims and survivors.

5.2 FCDO has recognised that tackling SEA in the humanitarian system requires long-term and determined attention. It has developed a wide-ranging strategy that considers the most relevant issues and has aimed to find the right balance between prevention and response, systemic and operational measures. The government's four strategic shifts provide an effective framework for tackling the issue, considering it from a range of different angles and approaches. The fact that this strategy is showing limited measurable impact so far is due in part to the scale and complexity of the problem itself. The UK's approach is showing some progress in effecting change at the international humanitarian system and organisational levels. However, it is being hampered by an imbalance in favour of global, high-level initiatives, with less focus on the grassroots and operational levels that have the most immediate impact on affected communities and victims and survivors. Below are our concluding thoughts on each strategic shift.

Strategic shift 1: Ensure support for survivors, victims and whistleblowers, enhance accountability and transparency, strengthen reporting, and tackle impunity

5.3 This is the most relevant area of the UK's strategy but has been the weakest in terms of delivery. Consultation with victims and survivors and whistleblowers has been sporadic and unsystematic. Emphasis has been on accountability towards the donor rather than towards people affected by humanitarian response. FCDO's own system for investigations was not designed to identify victims and survivors from affected populations, making it difficult to prioritise the most vulnerable people. More attention needs to be given to understanding where, when and how SEA takes place, for example in the context of local recruitment by humanitarian organisations. Reporting remains weak and more needs to be done to engage with national institutions to encourage reporting and tackle impunity.

Strategic shift 2: Incentivise cultural change through strong leadership, organisational accountability and better human resource processes

5.4 The UK has recognised the need for sectoral culture change and investment in processes that prevent offending and reoffending. However, investment has largely taken place at the international level. There is some evidence that this is starting to be felt at national and local levels of humanitarian responses, mainly driven by implicit or explicit threats of withdrawal of funds. The human resource processes that the UK has backed most heavily have still not got off the ground. The Misconduct Disclosure Scheme (MDS) is so far showing the best results, but is not yet able to screen staff recruited in country, which constitutes the vast majority of aid workers and particularly those working directly with affected people. Unless addressed, this weakness will only become more problematic as the number of staff recruited in country increases with the localisation agenda. This trend is likely to have been accelerated by the COVID-19 pandemic. Unfortunately, while schemes like the MDS have made some progress in addressing issues related to different countries' legislative and regulatory systems, this cannot compensate for systems that are inherently weak or corrupt, where robust documentation is missing, or where documentation and national systems have been disabled or destroyed by conflict or crisis.

Strategic shift 3: Adopt global standards and ensure that they are met or exceeded

5.5 Global standards have largely been reinforced at international and organisational levels of delivery partners directly funded by FCDO, normally large international humanitarian organisations. Some monitoring has been done to ensure that compliance with standards is being maintained across long delivery chains, but the amount of funding available diminishes at every level. Downstream partners at the end of the delivery chain are arguably most in need of support, but there is generally very little funding to help them adapt their systems, although some international partners have invested in training.

Strategic shift 4: Strengthen organisational capacity and capability across the international aid sector to meet these standards

5.6 Organisational capacity has largely been addressed at the international level, but, as noted under strategic shift 3, this is not necessarily reaching those who need it most. Initiatives like the Resource and Support Hub and online training would benefit from greater dissemination to the small civil society organisations that are the intended target. National partners are still not fully included in operational coordination due to lack of resources and language constraints, among other limitations, and their voices are not included at international levels.

Recommendations

Recommendation 1: FCDO should focus greater attention on humanitarian responses in country, supporting partners in implementing approaches to protection from sexual exploitation and abuse that are tailored to each context.

Problem statements:

- The UK's approach to humanitarian sector change has been focused appropriately at the global and systemic level, but its top-down nature means that change is not happening quickly enough at national level.
- Not enough work is being done to ensure that SEA is understood in context, and how responses can be tailored to specific risks and vulnerabilities.
- National and local humanitarian organisations are not sufficiently funded to establish and maintain robust systems for prevention and response.

Recommendation 2: FCDO should ensure that trusted mechanisms systematically capture the voices of affected populations, victims and survivors to inform policy and improve operations on sexual exploitation and abuse in humanitarian settings.

Problem statements:

- There is an absence of systems for ensuring that the voices of affected people are consistently informing strategy and response, including those of victims and survivors.
- The UK's focus on influencing at the international level and working globally has resulted in a push towards accountability to the donor rather than accountability to affected populations, and insufficient use is made of local rights organisations, women's groups and other community actors that are trusted by affected people.
- Reporting and complaints mechanisms are still not being used by victims and survivors or whistleblowers from affected communities, hindering efforts to improve reporting of cases and identify risk factors.

Recommendation 3: FCDO should develop and implement a research agenda on protection against sexual exploitation and abuse that identifies and prioritises key evidence gaps, in particular on what is happening on the ground.

Problem statements:

- The evidence base on protection from SEA in humanitarian settings is weak.
- Too much attention has been paid to prevalence (quantitative data) and not enough to qualitative information about where, when and how exploitation and abuse takes place, in order to better inform interventions and preventative efforts.
- The UK has not done enough to support the development of a substantial applied research agenda looking at how humanitarian actors can practically address the underlying causes of SEA.
- Support for the work outlined in FCDO's concept note on sexual exploitation, abuse and harassment data collection in the international aid sector has developed slowly.

Recommendation 4: FCDO should ensure that efforts to prevent the re-hiring of perpetrators of sexual exploitation and abuse include staff recruited in countries of humanitarian response, who make up the majority of humanitarian aid workers.

Problem statements:

- Employment screening schemes to prevent re-offending are not able to adequately detect misconduct perpetrated by people recruited at national level.
- Different legal systems and weak referencing and documenting systems in many countries undermine the effectiveness of the employment screening schemes.
- Challenges in screening locally recruited staff will persist due to practical constraints specific to each context, so employment screening schemes will never be more than a limited part of the response to the challenges of SEA in humanitarian settings.

Recommendation 5: FCDO should conduct a review of its approach to investigating allegations of sexual exploitation and abuse by humanitarian workers in order to address the points identified by this review.

- FCDO's investigations case management system is not sufficiently targeted to be effective.
- The case management system was originally not set up to search for or detect trends in cases against affected populations (ie non-staff), therefore obscuring those most at risk.
- FCDO guidance fails to adequately address human resource failures in investigations and disciplinary action, due process, and the rights of alleged perpetrators, whistleblowers and witnesses.
- Some cases of misconduct between partner staff members, which should be handled through partner human resource channels, have been inappropriately assigned to FCDO programme teams and the Safeguarding Investigations Team.

Annex 1: Methodology for engagement with affected populations

ICAI is committed to engaging with those affected by UK overseas development assistance in its reviews. For this review, the commission engaged with affected populations in two humanitarian settings to understand people's awareness and experiences of sexual exploitation and abuse (SEA), and their perceptions of the efforts made by aid agencies to prevent SEA and safeguard vulnerable people. The initial design focused on the three key humanitarian contexts selected for case studies in the review: **Bangladesh** (the response to the Rohingya crisis in Cox's Bazar), **Uganda** (the response to support the largest refugee population in Africa, mostly from South Sudan and the Democratic Republic of the Congo as a result of conflict and insecurity in those countries) and **Yemen** (the response to civil war that has affected the whole country). Because of COVID-19 restrictions, engagement took place only in Uganda and Yemen, between August and October 2021, reaching 600 people in total.

Approach and adaptations

The initial design comprised two main methods. A Computer-Assisted Telephone Interview (CATI) survey in Bangladesh, Uganda and Yemen aimed to generate quantitative evidence by engaging with a cross-section of those affected by humanitarian responses. We initially intended this to be complemented by in-depth, face-to-face focus groups with selected vulnerable groups in Bangladesh to provide a deeper understanding of the nature of SEA and people's experiences in reporting abuse.[74]

In June 2021, as planning for fieldwork was under way, cases of COVID-19 began to climb in Bangladesh and Uganda. Both governments implemented strict lockdowns preventing access to humanitarian settings for all but essential activities. In response, the design was revised to an entirely remote approach. The CATI survey was retained in Uganda and Yemen. Telephone-based, semi-structured one-to-one interviews with a sample of those responding to the CATI survey in Uganda replaced face-to-face focus groups in Bangladesh, to provide qualitative evidence.

It was not possible to obtain primary data from refugees in Bangladesh. In this context, the CATI survey with host community members in Bangladesh was also removed, as it would not add sufficient value on its own. The table below outlines the final approach implemented.

Quantitative			Qualitative
Method	Computer-Assisted Telephone Surveys		Telephone-based semi-structured interviews
Country	Uganda	Yemen	Uganda
Sample	A random sample of mobile phone users in Northern Uganda, screened for those living in areas where humanitarian agencies operate	A random sample of recipients of humanitarian aid, based on the database already held by the third-party monitoring programme	A purposeful sample of respondents to the CATI, focusing on those with knowledge of SEA in their communities
Number interviewed	300	300	30

[74] Bangladesh was selected for in-depth interviews because remote telephone surveys are not possible with Rohingya refugees due to government of Bangladesh regulations preventing refugees from legally owning a SIM card.

To avoid the risk of re-traumatising victims, we did not seek to specifically identify or target direct victims of abuse. Researchers were trained in psychological first aid and followed a trauma-sensitive research approach which avoided probing individuals for their testimony or detailed accounts of SEA.

A wholly remote approach required research protocols and ethical safeguards to be tailored to ensure that a conflict-sensitive and trauma-informed approach was maintained. Children and adolescents were not included as their safety could not be guaranteed using telephone-based methods.

Interviews were conducted in a variety of languages according to respondent preference. In Uganda interview scripts were available in three core languages: English, Juba Arabic and Swahili, and the survey team included those with a wider range of local languages. In Yemen interviews were conducted in Arabic including Southern Taizi, Lahji and Adani local dialects.

Limitations of a wholly remote approach

A wholly remote approach has limitations. Those without their own handset, or who are out of network coverage, cannot be included. This would tend to bias consultations away from more marginalised groups including poorer and more remote households. While a gender-balanced sample was achieved, fewer women than men own a phone, so sampling biases are stronger for female respondents. It is also more difficult to build trust and rapport, ensure an appropriate interview setting, and offer support to victims. On the other hand, the anonymity of telephone interviews may help interviewees talk about experiences that they may be reluctant to disclose in face-to-face settings. Overall, the approach is more likely to understate the prevalence of SEA than overstate it

This document can be downloaded from www.icai.independent.gov.uk.
For information about this report or general enquiries about ICAI and its work.
please contact:

Independent Commission for Aid Impact
Gwydyr House
26 Whitehall
London SW1A 2NP

enquiries@icai.independent.gov.uk