

# REVIEW OF NGO SAFEGUARDING PRACTICES AND SYSTEMS IN UGANDA



**IRMG**  
**Internal Risk  
Management Group**

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## Acknowledgements

This study is an output from the self-audit assessment exercise that was carried for the Internal Risk Management Group (IRMG) to increase the safety of NGO/INGO program participants and improve the overall impact, accountability and effectiveness of NGO/INGO programs in Uganda.

The Safeguarding study has been funded by the Swedish International Development Agency (Sida). The study has been prepared to facilitate the exchange of knowledge and to stimulate discussion. The findings, interpretations, and conclusions expressed are those of the author and do not necessarily reflect the policies or views of Sida or the Internal Risk Management Group. The stakeholders consulted for the self-assessment assessment are listed in [Appendix 1](#).

The assessment was led by Victoria McDonough, Safeguarding Consultant.

A special thanks to the IRMG Project Manager Henry Owora, IRMG Steering Committee and all other participants in the study.

## Foreword

In mid-2018, a group of INGO Country Directors in Uganda came to the shared realization that the only way to mitigate fraud, corruption and safeguarding cases is through sector wide collaboration, cooperation and exchange of information. However, due to the sensitivity of these cases and the reputational risk involved, there was little joint learning, reflection and sharing of experiences among the NGO community.

A founding group of Country Directors decided to form the “Internal Risk Management Group” (IRMG), a safe space for NGO leaders to share, learn and improve their management and mitigation of risk. As of January 2021 the IRMG consists of 66 NGO members, celebrating the diversity of Ugandan and international NGOs operating in the country. IRMG is further recognized as a one-stop-shop for donors to engage the NGO community in questions around fraud, corruption and safeguarding.

Under phase 1 of the project, the Department for International Development of the UK government (DFID)<sup>1</sup>, generously funded the IRMG to conduct a benchmark and baseline study of NGO Risk Management and Accountability Practices in the country, as well as to tailor and run training for IRMG member agencies to improve their understanding and ability to respond to internal risks in Uganda.

Under phase 2, Swedish International Development Agency (Sida) has allocated funds to continue providing support to NGOs operating in Uganda that are working to address internal risk management issues such as fraud and corruption, as well as funds to improve how NGOs prevent, mitigate and manage safeguarding issues. The program has three expected outcomes:

1. Improve organizational culture around dealing with fraud and corruption by implementing the recommendations from the year one assessment of best practices and gaps on fraud and corruption prevention, detection and management.
2. Improve the safeguarding practices and reduce the risks of Sexual Harassment Exploitation and Abuse (SHEA) and child abuse in NGO programs.

Leverage lessons learned and knowledge base of the IRMG to benefit the wider civil society sector in Uganda to improve management of misconduct, implement safeguarding practices and establish preventative measures against fraud and corruption.

It is for this reason that the assessment report was developed and commissioned to provide additional tips, practices, principles and supporting information to guide with strengthening the safeguarding processes in members’ respective organizations.

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<sup>1</sup> For purposes of this study, the term of Department for International Development (DFID) will be used instead of Foreign Commonwealth and Development Office as at that time of funding DFID was in place.

## About the IRMG

The IRMG Steering Committee is made up of nine NGO members who are elected on a yearly basis. The IRMG is currently chaired by the Country Director of Plan International, and co-chaired by Executive Director of Reach Out Mbuya. Mercy Corps is the current grant holder for the initiative, and has managed both the DFID and Sida grants related to this project. Other Steering Committee members include Catholic Relief Services, Danish Refugee Council, DanChurchAid, Care International, International Rescue Committee and Finn Church Aid. The IRMG Steering Committee is made up of Country Directors and Executive Directors of these NGOs, who meet monthly to set the strategic direction for the initiative. IRMG membership is open to all. As of January 2021 there were 66 members.

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# Table of Contents

<b>Table of Contents</b>	iv
<b>List of Abbreviations</b>	1
<b>Executive Summary</b>	2
<b>1. Introduction</b>	4
1.1 Background	5
1.2 Objective of the Review	5
1.3 Methodology	6
1.4 Definitions	7
<b>2. Key Findings</b>	9
<b>3. Recommendations for IRMG</b>	13
<b>4. Global PSEAH Status</b>	16
4.1 PSEAH Standards	17
4.2 Global Leadership	18
4.3 Donors	19
4.4 Global Survivor Centred Model	20
4.5 Ugandan Context	20
<b>5. Limitations and Challenges</b>	21
<b>6. Conclusion</b>	22
<b>7. List of Appendixes</b>	23
Appendix 1: List of IRMG Membership	23
Appendix 2: Summary of Key Self-Assessment Results and Actions	24
Appendix 3: Self-assessment Tool Results	26
Appendix 4: Online safeguarding resources	29
<b>8. References</b>	30

## List of Abbreviations

AAP	Affected Population Frameworks
CHS	Core Humanitarian Standard
CoP	Community of Practice
CSOs	Civil Society Organisations
DFAT	Department Foreign Affairs and Trade (government of Australia)
DFID	Department for International Development (government of the UK)
FCAS	Fragile and Conflict Affected Settlements
FRRM	Feedback, Referral and Resolution Mechanism
GBV	Gender based violence
HCT	Humanitarian Country Team
IIASC	Inter-Agency Standing Committee
IRMG	Internal Risk Management Group
INGOs	International Non-Government Organisations
MOPAN	Multilateral Organisation Performance Assessment Network
MOS-PSEA	Minimum Operating Standards for PSEA
NGOs	Non-government organisations (both international and local)
LNGOs	Local non-government organisations
IASC	Inter-Agency Standing Committee
LNGOs	Local non-government organisations
OECD/DAC Committee	Organisation for Economic Cooperation Development/Development Assistant
PSEAH/PSHEA	Preventing Sexual Exploitation, Abuse and Harassment/ Preventing Sexual Harassment, Exploitation and Abuse
SEAH/SHEA	Sexual Exploitation, Abuse and Harassment/ Sexual Harassment, Exploitation and Abuse
Sida	Swedish International Development Agency
TWG	Technical Working Groups
UN	United Nations
UNHCR	United Nations High Commissioner for Refugees
UNICEF	United Nations Children's Fund

## Executive Summary

In 2018, as a result of ongoing significant concerns about the risks of fraud, corruption, all forms of abuse and code of conduct breaches, a group of International Non-Government Organisations (INGOs) based in Uganda formed the Internal Risk Management Group (IRMG). In its third year of collaboration, the IRMG now has 66 members, including INGOs and local national non-government organisations (LNGOs). The IRMG was created to increase program accountability and effectiveness and to ensure that international aid sector commitments to protect beneficiaries from sexual exploitation, abuse and harassment (SEAH) are upheld. This also includes a duty of care to organisations' personnel to ensure they are also protected from Sexual Exploitation, Abuse and Harassment (SEAH).

SEAH of girls and boys, women and men are human rights abuses and crimes which can have a long term deleterious impact on victims and survivors and are unacceptable from organisations who are mandated to provide lifesaving protection and assistance to vulnerable populations whom they seek to protect from harm. SEAH is an abuse of power, compromises the safety and protection of program participants and/or organisation personnel and erodes the trust of the populations being served by aid agencies and the sector as a whole. IRMG expects all members to commit to zero tolerance of any form of abuse, exploitation or harassment.

As part of IRMG strategy to strengthen the capacity to improve safeguarding amongst the member organisations, an assessment was carried out on the 66-member organisations as one of the first activities for this component of the Safeguarding Project. The assessment was conducted to assess practices within a sample of the IRMG membership group to gather information on the current status of implementation of safeguarding to obtain a more comprehensive understanding of the existing Preventing Sexual Exploitation, Abuse and Harassment (PSEAH) practices and systems initiatives with the aim of strengthening capability and identifying any areas of improvement. This will guide the IRMG to support organisations that may require identified areas of improvements in respect to their safeguarding practices.

The review was undertaken between November-December 2020. This study summarises the findings of the assessment, provides a brief overview of the global safeguarding status and recommendations for IRMG. The findings of the study draw upon a brief desk review of literature including other organisations' policies and frameworks on safeguarding, key informant interviews with 5 selected members (3 INGOs and 2 LNGOs) and a safeguarding self-assessment tool completed by 25 out of 61 members (21 INGOs and 4 LNGOs) representing 40.9% of the membership.

A summary of the key findings clearly demonstrate that members are very keen to continue to do all that they can to collectively prevent and respond appropriately to SEAH and share resources, tools and guidance and further collaborate on prevention as well as response. All organisations involved in the study indicated that they are committed to PSEAH and there should be a zero-tolerance approach to any abuse with an increased focus on more effective reporting and support for victims/survivors.

The findings also demonstrate that, while IRMG members have some systems and processes in place to address risk, this varies widely given that there are large INGOs with higher levels of organisational capacity and resources including dedicated safeguarding advisors, investigators, and regular training, compared to small locally based NGOs with less resources. There was broad

agreement that, while all organisations should have a safeguarding focal point, this was not achievable given lack of resourcing.

The assessment identified a number of potential priority areas for the IRMG. The findings indicate that Uganda is not alone in facing challenges around PSEAH and in the implementation of policies. Like many other countries across the globe, challenges identified included: barriers to effective reporting mechanisms, lack of qualified investigators, lack of provision of appropriate support services to victims/survivors, limited processes for prevention and risk management. The findings also identified limitations around creating a survivor focused culture; scarcity of survivor support services, risk around ensuring the safety of the survivor particularly those most vulnerable, and the limited effectiveness of some community-based complaints, including beneficiaries not being aware of how to report and not being adequately consulted about how to prevent SEAH.

Challenges were evident around comprehensive recruitment practices and lack of consistent application; such as criminal checks being completed prior to being employed, the recruitment of volunteers, and conducting risk assessments for programs and activities that focus on PSEAH. Challenges are evident in the implementing partners contracted by the grant holders and in supporting these partners to ensure safeguarding obligations are being passed on.

**Recommendations for the IRMG members and wider sector include:**

- A deeper investment on the sharing of tools and resources, including best practice.
- Support collective action and sector-wide solutions by partnering with innovators such as the Safeguarding Resource Hub and technology providers for online repository sharing of resources and online training providers.
- Begin the establishment of the Community of Practice after the upcoming Safeguarding Training.
- Explore and promote online training and ongoing training face to face offered by many Ugandan based NGOs as well as ensuring sustainability by training up members through 'Train the Trainer' approach.
- Learn from the existing network; there are many resources and processes that can be shared and replicated.
- Pool resources for joint investigations.
- Pool expertise and resources for a complaints mechanism such as reports through the Feedback, Referral and Resolution Mechanism.
- Strengthen work around risk management and passing on obligations to implementing partners.
- Continue to improve organisational culture and risk awareness such as through joint awareness raising forums.
- Continue to work on a collective approach to challenging behaviours, norms and attitudes around SEAH especially with a focus on working with government and civil society.
- Further engage with donors for support in implementation of PSEAH obligations.
- Advocate with donors for PSEAH to be considered as part of programming and ensure there are adequate funds.
- Roll out annual audits of PSEAH implementation against a framework, including reporting concerns, to ensure that members implement the highest standards on safeguarding, built around a survivor-centred approach and an organisational culture that prevents abuse.

For a snapshot of the key self-assessment results and actions please refer to [Appendix 2](#).



## 1. Introduction

In line with global trends, international and local non-government organisations in Uganda are increasingly identifying fraud, corruption, safeguarding issues, and code of conduct breaches, including sexual exploitation and abuse, as growing risks to the aid sector's ability to deliver accountable and high impact programs. As well as undermining program effectiveness, these issues also have the serious potential to compromise the safety and protection of program participants and/or staff/volunteers and erode the trust of the populations being served by aid agencies and the sector as a whole.

In order to address these challenges, a group of INGOs based in Uganda formed the Internal Risk Management Group in 2018. The specific objective of the group is to reduce or mitigate the risks of fraud and corruption, sexual exploitation, abuse and harassment (SEAH) and other breaches of organisational codes of conduct by NGO staff and third parties such as partners, sub-awardees, vendors, contractors and volunteers. The goal of the IRMG is to increase the safety of the NGO program beneficiaries and improve the overall impact, accountability and effectiveness of NGO programs in Uganda. Now in its third year of operation, the IRMG consists of 66 international and national NGO members. As of 2021, IRMG is chaired by the Country Director of Plan International and co-chaired by the Executive Director of Reach Out Mbuya. Mercy Corps is the current grant holder for the initiative and has managed both the DFID (phase 1) and Sida (phase 2) grants related to this project. Mercy Corps engaged a Technical Safeguarding Consultant to support the Mercy Corps in-country Project Manager who is managed by an elected Steering Committee of nine NGO directors to ensure the successful implementation of the previously mentioned project activities.

Under phase 1, the Department for International Development of the UK government (DFID), generously funded the IRMG to conduct a benchmark and baseline study of NGO Risk Management and Accountability Practices in the country, as well as to design and run training for IRMG member agencies to improve their understanding and ability to respond to internal risk in Uganda. While the IRMG has focused its efforts on fraud and corruption in year 1, for the next year the scope of work has expanded to address SEAH, while also continuing to work on fraud and corruption.

Under phase 2 of the program, Sida has generously allocated funds to continue support to NGOs operating in Uganda to address internal risk management issues such as fraud and corruption, as well as funds to improve how NGOs prevent, mitigate and manage safeguarding issues. In particular, the program focus is on improving safeguarding practices and reducing the risks of SEAH and child abuse in NGO programs. This includes leveraging lessons learned and knowledge of the IRMG to benefit the wider civil society sector in Uganda to improve on managing wrongful conduct, including safeguarding practices and the prevention of fraud and corruption.

The IRMG has a key focus on program accountability and effectiveness and zero tolerance to any form of SEAH. This includes ensuring that commitments to protect beneficiaries from SEAH, including child abuse and exploitation, are upheld; and encompasses a duty of care to all staff and volunteers, including an expectation that members pass on responsibilities to implementing partners. The IRMG is committed to ensuring the voices, rights, and support of victims and survivors is at the forefront of the members' work. The IRMG believes that all people have the right to freedom from all forms of violence, abuse and exploitation and that safeguarding children and adults is 'everybody's business'.

The members of the IRMG envisage the creation of a safe space to discuss SEAH and risk issues; raise awareness of risks within the NGO community; share information and experience, including best practice in detecting misconduct and handling allegations. They strive to have organisations focus on supporting and learning from each other, share information, and generally increase the risk management capacity and accountability of the humanitarian and development sector in Uganda.

The IRMG asks that all NGO members ensure their safeguarding practices are robust enough to fulfil their responsibilities to prevent and respond to all forms of violence, abuse and exploitation towards children and adults. This includes: increasing organisations' understanding and support of safeguarding; supporting organisations in strengthening their systems and processes on safeguarding; improving coordination, communication and coherence among the IRMG, partners, and other relevant factors relating to safeguarding; and contributing to improved accountability towards affected populations.

## 1.1 Background

To ensure compliance with safeguarding standards and to assist in improving systems and processes to safeguard both children and adults from SEAH in the delivery of aid, a benchmark review was conducted. This focused on assessing existing safeguarding practices within a sample of the IRMG membership group through a self-assessment audit tool and key informant interviews in the context of global trends and most promising safeguarding practices.

## 1.2 Objective of the Review

The overall objectives of the benchmark review were to:

- Utilise a strengths-based approach to identify the safeguarding support requirements of IRMG members; and
- Identify the capacity support requirements, including training, and provide recommendations to improve safeguarding practices and capacity
- In order to report on NGOs' existing safeguarding practices and systems in the context of global inter-agency safeguarding and SEAH prevention and response guidelines.

The intention of the organisational self-assessment was to provide organisations with a baseline for tracking the progress of their organisational capacities on PSEAH, to develop an understanding of their strengths and areas where improvement on safeguarding is required. Organisations were encouraged to use the findings to develop an action plan that reflects identified areas for improvement on safeguarding.

The findings will also assist the IRMG to support organisations that require identified areas of improvements in respect to safeguarding as well as guide the project team plan for the most appropriate training needs, technical support and strategy for the Communities of Practice (CoP) for all the 66 members.

### 1.3 Methodology

The approach to conducting the review was as follows:

- Safeguarding Self-Assessment tool.
- Semi structured interviews with key IRMG stakeholders.
- Meeting with the Safeguarding Resource Hub and UNHCR.
- Desk review of supporting documentation that would assist with developing an understanding of SEAH and the identification of gaps and barriers.

The self-assessment tool was framed within the literature, including best practice and aligned with international PSEAH and frameworks. The key standards<sup>2</sup> in the self-assessment tool were mapped against sector-wide PSEAH standards such as the United Nations Protocol On Allegations Of Sexual Exploitation And Abuse Involving Implementing Partners and other relevant international standards, including the IASC (Inter-Agency Standing Committee) Minimum Operating Standards for PSEA (MOS-PSEA) and the Core Humanitarian Standard on Quality and Accountability (CHS) and revised PSEAH Index, including proposed indicators for MOPAN, DFID enhanced due diligence for Safeguarding and OECD DAC recommendations and best examples of safeguarding assessment tools and practices such as Keeping Children Safe, CHS Alliance PSEAH index, UNICEF and End Violence in collaboration with ChildFund, Plan International, Save the Children and World Vision International.

The structure of the self-assessment tool, with results, can be found in [Appendix 3](#).

The self-assessment tool and semi structured interviews covered key areas such as:

- a) safeguarding policy and code of conduct;
- b) leadership and governance;
- c) safe recruitment;
- d) reporting process;
- e) investigations;
- f) assistance and referral;
- g) safeguarding risk management;
- h) working through partners, contractors, and other third parties; and
- i) capacity strengthening

The tool was sent to all members of the IRMG. The self-assessment tool was completed and submitted by 25 organisations.

The methodology also included key informant interviews – a small sample of 6 organisations from the IRMG membership group were contacted. This was a combination of INGOs and NGOs from the Steering Committee members and broader membership including two from the Steering Committee (an INGO and LNGO) and three from the membership group. Three organisations agreed to take part in the interviews and five senior people were interviewed.

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<sup>2</sup> Core Standard 1: Organisational Policy (UN IP Protocol para 15 & Annex A.4). Core Standard 2: Organisational Management and HR Systems (UN IP Protocol para 11; 15; & Annex A.1, A.2). Core Standard 3: Mandatory Training. (UN IP Protocol para 17 & Annex A.5. Core Standard 4: Reporting (UN IP Protocol para 19 & Annex A.3.) Core Standard 5: Assistance and Referrals (UN IP Protocol para 22.d.). Core Standard 6: Investigations (UN IP Protocol para 20, 22.a., & Annex A.6)

The purpose of the semi structured interviews was to obtain a deeper understanding of PSEAH practices and enable a more comprehensive delve into responses to gain a greater understanding of risks and strategies for improving safeguarding capacity. It also enabled exploration of training topics and any innovative solutions to address areas for improvement across the sector to gain their perspectives of risks, strengths, gaps and suggestions to strengthen capacity.

Ethical safeguards were integrated in the self-assessment process. This included clarity provided on the purpose of the self-assessment prior to their participation, advising participants that there was no gain personal, financial or otherwise and that responses will not impact on accessing services or programs.

Organisations were also advised that the self-assessment responses and interviews would be conducted on the basis of confidentiality and that the report will provide a generalised overview of the safeguarding status of IRMG members, without specifying the source or organisation. To assist in analysis, the organisations were asked to indicate the size of their organisation when submitting their completed self-assessment. As such, the findings and recommendations in this study are not referenced to any individual or organisation.

## 1.4 Definitions

For the purpose of this study the following definitions were used:

**Safeguarding**<sup>3</sup> – the responsibility of organisations to make sure their staff, operations, and programmes do no harm to children and adults at-risk nor expose them to abuse or exploitation. This term covers physical, emotional and sexual harassment, exploitation and abuse by staff and associated personnel, as well as safeguarding risks caused by programme design and implementation. Many organisations now use this term to cover harm caused to staff in the workplace.

**PSEAH**<sup>4</sup> (Preventing Sexual Exploitation and Abuse and Sexual Harassment) - is a term used by those working in the international humanitarian and development sector to refer to measures taken to protect people from sexual exploitation, abuse and harassment by their own staff and associated personnel. It also means mean protecting staff and associated personnel from sexual harassment or misconduct within the workplace.

**Beneficiaries** - The individuals, groups, or organisations that directly or indirectly benefit from an intervention, project, or program.

**Child** - A person under the age of 18, regardless of the age of majority or age of consent locally.

**Implementing partners (“partners”)** - Entity responsible and accountable for implementation of the intended programme. It may include government institutions, intergovernmental organisations, civil society organisations and UN agencies.

**Whistle-blower** - Any person or partner agencies’ personnel who reports SEAH.

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<sup>3</sup> [www.bond.org.uk](http://www.bond.org.uk)

<sup>4</sup> CHA alliance

**Personnel** - This includes the organisation or partners' employees as well as sub-contractors, consultants, interns or volunteers associated with or working on behalf of the organisation or the partner organisation.

**Survivor** - Refers to a person who is, or has been, sexually exploited or abused or harassed.

**Gender-based violence (GBV)** - An umbrella term for violence directed toward or disproportionately affecting someone because of their actual or perceived gender identity. Sexual exploitation, abuse and harassment is a form of GBV.

## 2. Key Findings

As previously reported in a recent IRMG study on risk management practices and accountability<sup>5</sup>, Uganda has a challenging operating environment, both in the development and humanitarian contexts, which creates risk in fulfilling organisational responsibilities to prevent and respond to SEAH. Given this and similar findings from this assessment, it is clear that further work is required to strengthen the capacity of organisations.

The following are the key findings from the assessment:

### a) Safeguarding Policy and Code of Conduct

- The **organisational capacity** to develop and implement the safeguarding standards varies significantly across organisations. Some of the large INGOs are well resourced with safeguarding teams who have designated responsibility for investigations, training, policy, and auditing function; which is in stark contrast to smaller, less resourced NGOs. Scarcity of resources and competing priorities was commonly cited as an issue.
- Due to the lack of financial and human resources and capacity, the implementation of standards may not be consistently applied which increases risk for members. Great learning can come from the approaches utilised by the larger NGOs and the sharing of resources and tools.
- While 84% of organisations reported they had an overarching safeguarding policy in place which referenced children as well as adults, and a clear code of conduct, it was clear from respondents that the challenge lies in **the implementation** of the policy, systems and procedures.

### b) Leadership and Governance

- It was reported by some respondents that there is underreporting as there is a culture of silence around reporting and raising concern, especially around sexual abuse. It was also reported that there is a culture of fear resulting in not reporting 'negative' things against other people in the organisation for fear of retaliation or losing your job. Given that having systems and procedures by themselves are not enough, more emphasis is required to understand attitudes, norms and behaviours with senior leadership demonstrating increased accountability. It was positive to note that 75% of respondents reported that senior leadership actively promotes and supports safeguarding and encourages people to report.
- While some of the larger organisations (65%) had designated safeguarding focal points with clear safeguarding roles and responsibilities, this was not consistent. Not having a person who has responsibility for responding to SEAH concerns can raise risks for organisations. Designated staff with responsibility for receiving and managing reports is critical.

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<sup>5</sup> IRMG: Study on Internal Risk Management Practices and Accountability Practices in Uganda



**c) Safe Recruitment**

- While many organisations reported they had effective recruitment practices in place, this was not uniform. Only 57% reported they referenced safeguarding as an organisational priority in all job advertisements and role descriptions related to working with/access to vulnerable groups.
- There was also not consistent application of vetting procedures. Only 73% conducted criminal and other background record checks prior to a person taking up their role.

**d) Reporting Process**

- There are major barriers to effective reporting: While 84% of organisations have some reporting procedure in place with only 61% of staff knowing how to identify abuse, exploitation and how to report SEAH, all the respondents asserted there was still significant underreporting of SEAH. It was also unclear if implementing partners or beneficiaries were aware of these procedures and how to report. This is a major area of risk.
- The review indicates that 73% of organisations reported SEAH cases with recommendations on areas of improvement to senior leadership.
- Effectiveness of community-based complaints mechanisms: respondents largely reported that they are on a learning curve with regards to this and require support in this area. Only 57% reported they have mechanisms and procedures for beneficiaries and community to report SEAH allegations. In addition, it wasn't clear how effective the referral systems were and how well they were socialized to the community.

**e) Investigations**

- Investigative capacity was reported to be a challenge for most organisations in all settings, but most notably in Fragile and Conflict Affected Settings (FCAS) especially when a volunteer was the alleged perpetrator.
- While some of the larger organisations have their own investigators (61%), this was not representative of the entire membership. Discussions indicated that many felt they did not have the skilled staff in place to respond to a report or investigate, nor had the resources to carry out an investigation. This is similar across the sector worldwide in that key challenges remain in resourcing: to ensure that complaints can be handled promptly and effectively; there is the required skill set; standards are harmonised to ensure consistency; there is a strengthening of capacities especially around interviewing children, people with a disability and other vulnerable people; and integrating a survivor centred approach within investigations.
- Good practices noted across the board included: having a multidisciplinary team of people who undergo regular investigative training trained and experienced investigators who speak several languages, a gender balanced investigations team, and access to professional investigations consultants to supplement internal capacity during busy periods.

**f) Assistance and Referral**

- The review indicated that a survivor centred approach is limited: 61% reported they have a system to ensure survivors receive immediate professional assistance and are referred to qualified service providers. Further discussions with respondents indicated it is likely

that organisations are not developing their reporting and response measures to reflect general principles associated with a survivor centred approach; i.e. putting the focus on the needs of the survivor first, supporting to the survivor and throughout the investigations.

- Only 57 % of respondents reported they have internal and community based reporting mechanisms in place. All those interviewed reported a lack of effective referral pathways and services for victims and survivors, especially for children. Finding specialised support services for people whose actions are against the law is also difficult. Organisations' support in this area is dependent on effective referral pathways and availability of support.
- Gaps in safety and security and preventing reprisals: This was seen as a large gap amongst all respondents. A survivor's fear of reprisals and backlash were viewed as a major block to reporting in both humanitarian and development settings. This also included reprisals against witnesses reporting concerns and lack of trust in the process which was often not seen as confidential. Few organisations have provisions to guarantee the personal safety and security of survivors that speak up, and it was noted that there is limited protection for whistle-blowers and survivors.
- Legal and justice assistance for survivors: It was reported that impunity still exists and there isn't a level playing field between survivors and perpetrators. It was reported that people do not have trust in the judicial system and noted that police do not have training in interviewing children. Additionally, there is a lack of specialised skill throughout the sector in certain areas – for example, interviewing children and working with particular vulnerable groups. This was all seen as a deterrent to reporting as it was unclear if any long-term assistance such as psychosocial support, relocation, education fees, vocational training is provided.

#### **g) Safeguarding Risk Management**

- Prevention and proper risk management is required to ensure safe programming: There was a gap in respondents reporting that they designed programmes and activities to identify and mitigate SEAH risks. Only 50% of organisations reported that they have a process for assessing safeguarding risks across all activities.
- It was identified that SEAH policies are not fully integrated into all aspects of operations and given there is higher risk of SEAH occurring in a humanitarian context such as the distribution process (transportation, distribution of aid, storage of aid, registration), this is a concern.

#### **h) Working through partners, contractors and other third parties**

- 73% of organisations reported that their contracts and partnership agreements have a standards clause requiring contractors, suppliers, consultants and sub-partners to commit to SEAH and take measures to prevent SEAH. However, those interviewed indicated that cascading obligations to downstream partners including implementing partners, vendors, subcontractors is a major gap. The zero tolerance to SEAH needs to be effectively communicated to all and monitored – given this is a great area of risk.
- It was also recognised that volunteers are a high risk group, although there was often little monitoring of them and passing on of obligations.



- It was identified by some respondents that there is a need to prioritise work with partners to create a culture of reporting to reduce the risk that harm may befall those whom we seek to protect, including staff and volunteers.
- Capacity Strengthening
- Training: while many respondents (69%) either provided training to their personnel or attended training provided by other organisations such as CARE, Save the Children, and UNICEF, attending regular training was not consistent.
- All respondents interviewed were keen for the IRMG to provide comprehensive safeguarding training which was tailored to the requirements of the IRMG, culturally specific which challenged pre-existing thoughts and beliefs. Training topics identified included: a shared understanding of key concepts (e.g. children, SEAH, Safeguarding, GBV, survivor centred); Ugandan and international frameworks/legislation; global SEAH standards and best practice; roles and responsibilities to safeguard people both within and external to the organisation; key policy requirements, including partner and donor obligations; red flags in recruitment/screening; code of conduct; conducting child protection and SEAH risk assessments; reporting - how to recognise and report abuse, neglect, and exploitation; developing effective complaints and referral mechanisms; investigations including key principles, survivor centred practice, confidentiality, informed consent, report writing, and interviewing children; program context including safe programming, improving beneficiary accountability and feedback mechanisms.
- It was identified that there are pockets of good practice within some organisations who have their own investigators and/or trained psycho social support/social work staff. It was also identified that some organisations have the ability to train up IRMG members on safeguarding.
- The UN PSEAH taskforce is making progress and many NGOs are on the taskforce. This was seen as a platform where other organisations could join and continue communication on SEAH.
- There is scope for more organisations to join UNHCR's Refugee Feedback, Referral and Resolution Mechanism.
- Ulearn IRMC and Reach Impact (Uganda)<sup>6</sup> has a safeguarding learning component focus that could be utilised.
- The Safeguarding Support Hub <https://safeguardingsupporthub.org/> supported by DFID/BOND, aims to support organisations in the aid sector to strengthen their safeguarding policy and practice against SEAH. They provide global tools, resources, evidence based research, news and events. Smaller, local organisations in developing countries are the Hub's focus and the first National Hub is being piloted in Ethiopia.

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<sup>6</sup> The U-LEARN is a consortium that conducts a third party monitoring of the BRAER partners funded by DFID.

### 3. Recommendations for IRMG

Taking into consideration the findings from this review, the IRMG can continue to play an influential role in improving risk management by supporting members to:

- strengthen their capacity to further increase their (and implementing partners') understanding and support of PSEAH and to ensure minimum standards are met;
- strengthen their PSEAH systems and processes; and
- improve PSEAH coordination, communication, and coherence among partners.

**The following recommendations are proposed:**

- a) **Leadership:** Continue to work towards changes to culture through strong leadership in challenging attitudes and behaviour to create an environment where people to feel safe in reporting. Promote an understanding of the drivers of abuse and exploitation, including developing more open, inclusive attitudes towards sex and sexuality, and training staff in understanding the risk factors for sexual abuse. Continue to seek funding from donors to support PSEAH. Learn from other members and collaborate with others who already have existing safeguarding processes and systems in place.
- b) Collaborate with **innovators and technology providers** to test and potentially scale up applications which could enhance the efficiency and effectiveness of safeguarding. Collaborate with the Safeguarding Resource and Support Hub (<https://safeguardingsupporthub.org/>). The Hub has expressed support to IRMG with the possibility of setting up an online platform such as the one they developed for Ethiopia. The Ethiopia Hub launched an innovative and practical 6-month scheme designed to support small and less resourced CSOs to strengthen their safeguarding capacity and is called the RSH Ethiopia Hub Mentorship Scheme. The Safeguarding Hub also advised they have the potential to upload IRMG safeguarding resources and add IRMG as a member so all can access them. They can also provide mentorship, online training, webinars and podcasts.

An online repository could also be set up for templates, policies, audit tools, reporting examples, training and CoP collaboration forum via a range of online platforms (Google doc, Yammer, Drop Box, Basecamp).

- c) **Capacity strengthening training:** Progress is currently underway for the IRMG to contract a training provider who will develop and facilitate safeguarding training from March 2021. Ensure that the consultant incorporates findings from this assessment and there is the opportunity at the training for members to further develop Action Plans that have arisen from the self-assessment.
- d) Use the opportunity at the training to launch the **community of practice** in March. The PSEAH CoP can focus on knowledge exchange and capacity building, as well as being a mechanism by which the IRMG can monitor progress as a group the uptake of safeguarding standards, and identify and address challenges that are being faced by organisations. This group could develop some activities such as: holding a safeguarding symposium, monthly case conferencing on cases to learn from each other, identifying processes that could easily be adopted by other members, sharing their PSEAH training calendar with other members, and establishing a pool of investigators. This could begin with a forum of key members and regular learning events. Government ministry staff

could be invited (this approach has worked well in the adoption area in Uganda). Ensure there is a means of **communication** to get the message out to all members such as newsletter, bulletin board. Document and socialise the good practices. There is no need to re-invent the wheel as many countries have established CoPs; Save the Children has some useful ideas on which to draw upon. UNHCR has also established a **PSEAH Focal Points** system and created a CoP using Yammer (a web-based platform) to enhance information and good practice sharing.

- e) While regular face to face safeguarding training is required this can also be complemented by **online training**. These training opportunities could be made available through an online tool or through a newsletter. Existing resources that would be helpful for the IRMG are detailed in [Appendix 4](#).
- f) **Safe recruitment:** Advocate for there to be a standardised comprehensive human resource processes including referee and criminal checks and references shared between organisations. Explore the potential of all appropriate organisations signing up to an inter-agency misconduct scheme as one way of approaching this. This requires applicants to self-declare prior issues of sexual or other misconduct and termination of past employment in the application, and to consent to the disclosure of any misconduct or termination information by their former employer during the verification of references. Affirmative responses or the failure to consent to the disclosure of information results in the rejection of the applicant.
- g) Continue to ensure there is a focus on **prevention programming** (not just response), including raising awareness, reporting unacceptable behaviour, education programs targeted at children to help them to identify abusive situations and to respond appropriately. Provide a space to hear children's and young people's voices.
- h) **Reporting:** Continue efforts to ensure there are appropriate, accessible, and confidential reporting channels that have been designed in consultation with the community, including channels that are designed to proactively enable reports of SEAH.
- i) **Survivor led assistance and referral:** Continue to advocate for members to have a stronger focus on survivor support, protection of whistle-blowers and enhanced accountability and transparency, to strengthen reporting. Move towards ensuring survivors are at the centre of the process, kept safe as far as possible, informed, empowered, involved in choices and decisions. **Advocate for support and advocacy services** for victims and survivors, including multi-sectoral services and programmes for survivors and health, psychological support, counselling, social support in the short and long-term. This includes working closely with others to improve legislation and the criminal justice system to ensure effective implementation and protection of survivors.
- j) Explore setting up strong and effective **joint** safeguarding systems including exploring expanding membership of reporting through UNHCR's **Refugee Feedback, Referral and Resolution Mechanism**. Invite UNHCR to the Steering Committee to talk further about the Mechanism.
- k) **Safeguarding Risk Management:** consider the possibility of agreeing on minimum safeguarding standards and ensure members and partners meet them. An annual review could be conducted to assess implementation and/or a self-audit process. This includes

members reporting to IRMG annually on the outcomes of investigations and cases reported. There are a variety of self-assessment tools that could be used.<sup>7</sup>

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<sup>7</sup> One tool that exists is offered by the **CHS Alliance** which enables organisations to conduct a self-assessment against the Core Humanitarian Standard, using one of the four options (self-assessment, peer review, independent verification and certification). The self-assessment extracts a detailed PSEA score (taken from 18 of the 62 indicators) and provides a comprehensive picture of different elements contributing to effective work on PSEA in an organisation. The score is fed back to the individual organisation and provides a way of tracking progress on PSEA.

Another tool to track performance has been established by **Keeping Children Safe** – an entity which provides standards, support and guidance to organisations to prevent the risk of abuse and exploitation of children. Keeping Children Safe assesses organisations against a comprehensive set of indicators and then develops an implementation plan for each organisation to demonstrate that they meet international child safeguarding standards.

## 4. Global PSEAH Status <sup>8</sup>

While sexual exploitation, abuse and harassment in the aid sector has been highlighted in the media in the past few years, it is not a new phenomenon. Women and girls whom the providers of aid are seeking to help are particularly vulnerable. Those facing discrimination such as age, disability, race and sexuality are also at risk. Uganda, like many countries in the world, has had reported cases of SEAH committed by both government and non-government staff and volunteers.

As a result of widespread sexual abuse and exploitation of beneficiaries in West Africa, in 2002 the UN Inter-Agency Standing Committee (IASC) adopted six core principles intended to set forth standards to prevent SEAH. These principles were incorporated into the *UN Secretary General's Bulletin on special measures for protection from sexual exploitation and sexual abuse* <sup>9</sup> (2003). The Bulletin states that “sexual exploitation and sexual abuse violate universally recognized international legal norms and standards and have always been unacceptable behaviour and prohibited conduct for United Nations staff.” It obliges UN staff to report incidents of abuse, and is binding on all UN staff, including all agencies and individuals who have cooperative agreements with the UN. UN organisations apply the 2003 bulletin and, in some cases, have used it as a foundation for the development of agency-specific policies.

In addition, there are also two other UN safeguarding bulletins – one on the prohibition of discrimination, harassment, including sexual harassment, and abuse of authority (2008); the other (2017), on protection against retaliation for reporting misconduct, measures to combat whistleblower retaliation and for cooperating with duly authorised audits or investigations. The Group of UN Representatives of Investigation Services (UN-RIS) was established in 2015 and is comprised of the heads of oversight of 24 investigations services. In 2017, a joint taskforce was established to strengthen and harmonise investigations into sexual exploitation and abuse. Guidelines – *Uniform Principles and Guidelines for Investigations on Sexual Exploitation and Sexual Abuse* <sup>10</sup> - were developed and represent a practical tool for investigations within the survivor centred approach.

Since then, in 2018 the media again highlighted a pattern of sexual exploitation, abuse and harassment in the NGO/aid sector. This was a catalyst for the sector to urgently review their practices and procedures. In the same year, 205 allegations of SEAH involving UN Staff were reported and 123 allegations involving implementing partners. Following this, reported in November 2018 were actions to be coordinated by the *IASC and the UN Chief Executives Board Task Force on Addressing Sexual Harassment in the UN System*<sup>11</sup>. These included steps to recruit additional capacity, strengthen training, develop performance indicators for investigations, develop a shared methodology on approaches to investigations, define common terminology, integrate a survivor centred approach to investigations, establish consistent evidentiary rules, address bias/stereotypes, promote partnerships and identify optimal practices for pooling investigators.

The UN is guided by the *United Nations Protocol on Allegations of Sexual Exploitation and Abuse Involving Implementing Partners* and the *United Nations Protocol on the Provision of Assistance to*

<sup>8</sup> Source of material: Best practice in engaging survivors of Sexual Exploitation Abuse and Sexual Harassment (SEAH) RSH Helpdesk Number 3 Fraser, E and Beadle, D. (2020) Best Practices for *Engaging Survivors of SEAH*, RSH Helpdesk Research Report No. 3. London UK: RSH and Plasket, I. (2020) Global Scoping of Initiatives to Support Survivors of SEAH: From Reporting to Response, RSH Helpdesk Research Report No. 2. London UK: RSH

<sup>9</sup> <https://www.un.org/preventing-sexual-exploitation-and-abuse/content/documents>

<sup>10</sup> *Investigation\_Guidelines\_ENG\_August\_2019.pdf* [www.undp.org](http://www.undp.org)

<sup>11</sup> [https://interagencystandingcommittee.org/system/files/2018.hlcm\\_14.add\\_1\\_1\\_-\\_annexes\\_1-7\\_-\\_progress\\_report\\_by\\_the\\_ceb\\_task\\_force.pdf](https://interagencystandingcommittee.org/system/files/2018.hlcm_14.add_1_1_-_annexes_1-7_-_progress_report_by_the_ceb_task_force.pdf)

*Victims of Sexual Exploitation and Abuse*<sup>12</sup>. The United Nations Protocol on the *Provision of Assistance to Victims of Sexual Exploitation and Abuse* began its roll out last year with the aim to provide consistent direction across the United Nations system. Other initiatives at this level include the mapping of services available to survivors of SEAH and the establishment of Field Victims' Rights Advocates in the Central African Republic, the Democratic Republic of the Congo, Haiti and South Sudan.

There isn't one global body with oversight of all in-country PSEAH implementation. The Office of the Special Coordinator (OSC) on sexual exploitation and abuse is dedicated to improving the UN-wide response on SEAH, and the Office of the Victims Rights Advocate is dedicated to improving a UN-wide response for victim and survivor rights. The IASC is dedicated to strengthening the humanitarian sector's approach to PSEAH (both UN and non-UN entities). As such, reporting on in-country collective SEAH prevention and response activities occurs through the usual accountability lines of Resident and Humanitarian Coordinators.

#### 4.1 PSEAH Standards

The most widely used PSEAH standards are the IASC Minimum Operating Standards for Protection from Sexual Exploitation and Abuse for UN and non-UN staff and the Core Humanitarian Standards.

##### Inter-Agency Standing Committee

The *Inter-Agency Standing Committee's Championship Strategy on PSEA and Sexual Harassment* (2018) details three key outcomes needed at the country level in humanitarian settings. These are:

- Safe and accessible reporting – encouraging survivors to come forward and a speak-up culture;
- Improving quality assistance for the survivors of SEA; and
- Strengthened vetting, reference checking, disciplinary measures, and enhanced accountability, including investigations at the country level.

The IASC is committed to immediate collective action to:

- Ensure a survivor-centred approach to addressing SEAH;
- Promote positive change in organisational culture through strategic communications and role modelling;
- Improve referencing systems to stop transgressors from moving through the humanitarian sector;
- Strengthen sector-wide investigations capacity; and
- Support collective activities of in-country networks to PSEAH.

The eight areas covered by the IASC Minimum Operating Standards are as follows:

1. Effective policy development and implementation;
2. Cooperative arrangements;
3. A dedicated department/focal point committed to PSEAH;
4. Effective community-based complaints mechanisms, including victim assistance;
5. Effective and comprehensive communication from headquarters to the field on expectations regarding raising beneficiary awareness on PSEAH;

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<sup>12</sup> <https://www.un.org/preventing-sexual-exploitation-and-abuse/content/policies-and-protocols>



6. Effective recruitment and performance management;
7. Effective and comprehensive mechanisms established to ensure awareness-raising on SEAH amongst personnel; and
8. Internal complaints and investigation procedures in place.

### Core Humanitarian Standards

The Core Humanitarian Standards (CHS) is a broad quality and accountability framework describing the essential elements of principled, accountable and high-quality aid.<sup>13</sup> Protection from sexual exploitation, abuse, and harassment is incorporated throughout the CHS and organisations can measure and improve their performance against it. One of the verification tools is the PSEAH index, which is an amalgamation of the CHS indicators that relate to PSEAH and include specific PSEAH requirements.

The CHS Alliance is a global alliance of humanitarian and development organisations who implement the CHS. On the CHS Alliance website is a useful PSEAH Implementation Quick Reference Handbook <https://www.chsalliance.org/get-support/resource/pseah-implementation-quick-reference-handbook/> (which includes a chapter on community-based complaints mechanisms, including survivor centred approaches). They also conduct training, including investigations including online, residential and mentoring components. In partnership with the Institute of Social Studies at Erasmus University, the Alliance plans to conduct research and pilot innovative ways of improving PSEAH and reporting systems at a national level in three pilot countries in partnership with the IASC PSEA Technical Working Group.

### Keeping Children Safe

Organisations should also adhere to the Keeping Children Safe International Child Safeguarding Standards.<sup>14</sup> These Standards require all organisations who have contact with children to have a child safeguarding policy, training, reporting systems and child safeguarding measures in place across all organisational activities and processes.

## 4.2 Global Leadership

Global leadership on SEAH is provided by several actors across multi-lateral, bi-lateral, non-governmental and inter-governmental landscape. The UN Inter-Agency Standing Committee (IASC), individual UN entities, OECD-DAC, FCDO, the Australian Government Department of Foreign Affairs and Trade (DFAT). Large INGOs, such as Save the Children, Plan International, World Vision, ActionAid, Care International, Oxfam International, and the Norwegian Refugee Council have been very active in PSEAH as have Bond, InterAction and the Australian Council for International Development (ACFID). Understandably there is a wide variance across the sector depending on the size and scale of the organisation.

<sup>13</sup> <https://www.chsalliance.org>

<sup>14</sup> <https://www.keepingchildrensafe.global/wp-content/uploads/2020/02/KCS-CS-Standards-ENG-200218.pdf>

Work undertaken in humanitarian and fragile and conflict afflicted settings (FCAS) is more visible around establishing safeguarding and PSEAH frameworks. In 2020, the countries with PSEAH networks were - Afghanistan, Burkina Faso, Burundi, Cameroon, Central African Republic, Chad, Colombia, DR Congo, Ethiopia, Haiti, Iraq, Lebanon (humanitarian country team [HCT]/ Inter-Cluster Coordination Group (Libya, Mali, Mozambique, Myanmar, Niger, Nigeria (northeast only), occupied Palestinian territory, Somalia, South Sudan, Sudan, Syria (in country, regional, Gaziantep), Ukraine, Venezuela, and Yemen.<sup>15</sup>

Each PSEAH network is in varying degrees of development and their effectiveness is directly related to this. According to IASC data collected in late 2019 - only 12 (43%) of HCT operations had full-time inter-agency PSEAH coordinator staff to support and facilitate the PSEAH network and implementation. Twelve HCT operations (43%) had inter-agency community-based complaints mechanisms for handling SEAH by humanitarian workers. In addition, half or fewer of HCT operations: had accountability to affected population frameworks (AAP), used GBV Information Management Systems, had a strategy for mainstreaming GBV-related actions, or had inter-agency referral mechanisms for handling SEAH complaints in place. While all operations had Inter-Cluster/Sector Coordination Groups only 61% of these had workplans and 39% performance monitoring. Globally there exists a total of 287 clusters, sectors and areas of responsibility in 25 operations. Of these, 54% had technical working groups (TWG) to support specific functions – including case management. National cluster leadership was provided by the UN in 75% of operations, INGOs being co-chair in 73% of operations, and leadership in technical working groups being provided by the UN in 48% of operations. There is no data on the number of technical working groups specifically for safeguarding or PSEAH topic areas (including survivor centred approaches).<sup>16</sup>

### 4.3 Donors

Following the 2018 ‘scandals’ that rocked the NGO sector, donors took fast collective action through the OECD Development Assistance Committee (DAC), to develop a legal standard to prevent and respond to SEAH. The resulting *Recommendation on Ending Sexual Exploitation, Abuse and Harassment in Development Co-operation and Humanitarian Assistance* was adopted on 12 July 2019.

<sup>17</sup> The Recommendation sets out a first international standard in this area for governments to apply to their national aid agencies, and the wider international community, when working with civil society, implementing partners, private sector entities and other bodies running development programmes or delivering humanitarian aid. OECD-DAC Recommendation on Ending Sexual Exploitation, Abuse and Harassment in Development Co-Operation and Humanitarian Assistance was adopted on 12th July 2019 and sets out 6 pillars for SEAH prevention and response (<http://www.oecd.org/dac/gender-development/dac-recommendation-on-ending-sexual-exploitation-abuse-and-harassment.htm>).<sup>18</sup> In January 2020 the OECD-DAC established a PSEAH Reference Group. This has enabled a space for dialogue on SEAH and survivor centred response.

<sup>15</sup> Reported by Wendy Cue, IASC / OCHA Senior Coordinator for Protection from Sexual Exploitation and Abuse (PSEA) and Sexual Harassment Inter-Agency Standing Committee (IASC) Secretariat, June 2020

<sup>16</sup> Source of material: Best practice in engaging survivors of Sexual Exploitation Abuse and Sexual Harassment (SEAH) RSH Helpdesk Number 3 Fraser, E and Beadle, D. (2020) Best Practices for *Engaging Survivors of SEAH*, RSH Helpdesk Research Report No. 3. London UK: RSH and Plasket, I. (2020) Global Scoping of Initiatives to Support Survivors of SEAH: From Reporting to Response, RSH Helpdesk Research Report No. 2. London UK: RSH

<sup>17</sup> <https://www.oecd.org/gender/data/aid-to-gender-equality.htm>

<sup>18</sup> 6 Pillars: 1. Policies, professional conduct standards, organisational change, and leadership

2. Survivor/victim-centred response and support mechanisms  
3. Organisational reporting, response systems, and procedures  
4. Training, awareness raising, and communication  
5. International coordination  
6. Monitoring, evaluation, shared learning, and reporting



## 4.4 Global Survivor Centred Model

Few aid organisations have a strong emphasis on a survivor centred approach where the survivor is at the forefront of any complaint and investigation and their views are seen as a priority. In a Global Scoping of Initiatives to Support Survivors of SEAH<sup>19</sup> it was identified that there is no single, universally agreed, survivor centred model or set of standards. While Guidance exists in the areas of case management, child protection, gender based violence and violence against women it is not consolidated/adapted to SEAH. As there is no universally agreed survivor centred model, associated standards, guidance and tools. This creates challenges to the aid sector as organisations may respond quite differently in reporting and response.

## 4.5 Ugandan Context

While significant SEAH risks and challenges continue to exist across the globe around gaps in service provision, legal support, protection especially around safety and security of survivors, and required long term support, there has been positive global progress including in Uganda in addressing these risks. As mentioned previously, there are a growing number of organisations that have endorsed the Statement of Commitment on Eliminating Sexual Exploitation and Abuse by UN and Non-UN personnel, including the Standards to support progress made towards eliminating sexual exploitation and abuse by personnel. More organisations have reaffirmed their commitment to achieving full implementation of the six Core Principles adopted in 2002 (and updated in September 2019) by the IASC Working Group on Prevention and Response to Sexual Exploitation and Abuse. Many aid organisations have developed their own SEAH policies, including child protection policies.

The minimum standards have also informed organisational policies, codes of conduct and systems to report and respond to SEAH related allegations. In June 2019, the first global agreement/convention to end violence and sexual harassment in the work place, led by ILO was passed (the *Violence and Harassment Convention, 2019 (Number 190) and Recommendation Number 206*<sup>20</sup>). Uganda had previously ratified this Convention.

In Uganda, UNHCR developed the world's first Inter-Agency UNHCR's Refugee Feedback, Referral and Resolution Mechanism (FRRM). The FRRM is gradually incorporating operational partners some of which are IRMG members. UNHCR has also trained partners in its Inter-Agency PSEA Action Plan. IRMG members such as CARE have conducted trainings on PSEAH for humanitarian organisations; Save the Children has provided training on Child Protection, and Oxfam on PSEAH. The Government of Uganda developed a Joint Framework for Action to address issues of fraud, corruption and SEAH in the refugee response. The UN PSEAH network is active with representatives from IRMG members.

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<sup>19</sup> Plasket, I. (2020) Global Scoping of Initiatives to Support Survivors of SEAH: From Reporting to Response, RSH Helpdesk Research Report No. 2. London UK: RSH

<sup>20</sup> [https://www.ilo.org/global/publications/meeting-reports/WCMS\\_721160/lang-en/index.htm](https://www.ilo.org/global/publications/meeting-reports/WCMS_721160/lang-en/index.htm)

## 5. Limitations and Challenges

The following limitations with this assessment require consideration when reviewing the findings and recommendations:

- Delays in recruitment led to lack of availability of a Safeguarding Advisor to support the Safeguarding Consultant /IRMG and study.
- Not all organisations completed the self-assessment.
- Delays in receiving the self - assessment by the due date led to an extension impacting on return of data.
- Only 50% of those contacted to be interviewed responded.

## 6. Conclusion

The review clearly indicated that the members who participated have a strong commitment to the prevention of and response to SEAH and would like to see a more coordinated response in sharing expertise, knowledge and learning from other organisations. All participants involved in the review expressed considerable positive engagement with IRMG and a willingness to do all that they can within their organisations to prevent and respond to SEAH. The focus on SEAH and commitment to prevention and response is to be commended. The review demonstrates that while Uganda is a challenging environment, many of the safeguarding challenges are not necessarily unique to Uganda – the combination of both increases the risk of harm, particularly those most vulnerable such as children, women and those with disabilities.

The work required to prevent harm to others and improve accountability towards affected populations is a long term approach requiring not only the development of systems and processes but cultural change, an analysis of power, investment in gender equality, and ongoing funding and resources. Further support will be required from donors to assist in this.

## 7. List of Appendixes

### Appendix 1: List of IRMG Membership

INGOs			
1	Farm Africa	28	CARE International in Uganda
2	SNV Netherlands	29	Voluntary Service Overseas (VSO)
3	EMERGENCY	30	Oxfam
4	ADRA	31	BRAC
5	Jhpiego	32	GOAL
6	Population Services International (PSI)	33	War Child NL
7	Farm Radio International	34	Diakona
8	Food for Hungry	35	Malteser International
9	Protos	36	Finish Church Aid (FCA)
10	Norwegian Refugee Council (NRC)	37	Finnish Refugee Council (FRC)
11	Tutapona	38	Give Directly
12	Avocats Sans Frontières	39	AVSI Foundation
13	Plan International	40	Self Help Africa
14	Catholic Relief Services (CRS)	41	Dan Church Aid (DCA)
15	Save the Children	42	International Rescue Committee (IRC)
16	International Justice Mission (IJM)	43	TechnoServe
17	World Vision International	44	International Republican Institute
18	Humanity & Inclusion	45	Medical Teams International
19	Welthungerhilfe (WHH)	46	Vi Agroforestry
20	AgriTechTalk Africa	47	War Child Canada
21	African Medical and Research Foundation (AMREF)	48	Samaritan's Purse
22	Restless Development Uganda	49	ACTED
23	Mercy Corps	50	Caritas International Belgium
24	Action Against Hunger (ACF)	51	Trócaire
25	Danish Refugee Council (DRC)	52	Caritas Arua Diocese
26	Lutheran World Relief	53	Transcultural Psychosocial Organization (TPO)
27	Lutheran World Federation	54	LifeNet International
LNGOs			
1	Joint Effort to Save the Environment (JESE)	7	Soroti Rural Development Agency (SORUDA)
2	Multi Community Based Development Initiative (MUCOBADI)	8	Center For Health, Human Rights And Development (CEHURD)
3	Reach Out Mbuya Parish HIV/AIDS Initiative	9	Chapter Four Uganda
4	Community Empowerment For Rural Development (CEFORD)	10	Community Volunteer Initiative for Development ( COVOID)
5	Child I Foundation (CiF)	11	Uganda Society for Disabled Children (USDC)
6	Kabarole Research And Resource Centre (KRRC)	12	Voluntary Action for Development (VAD)

## Appendix 2: Summary of Key Self-Assessment Results and Actions

Safeguard Standard	Key Findings of members	Action
<b>Safeguarding Policy</b>	1. 84% have safeguarding policies with a clear code of conduct	Ensure all members have compliant policies in place with evidence of implementation
	2. 65% have a safeguarding focal person	Advocate for all organisations to have a focal point in place with clear responsibilities and who can be part of the CoP
	3. 69% have either had training for staff or attended training by other partners	All organisations to have trained staff/volunteers by mid-year by attending the IRMG training or training provided by the organisation
	4. 61% staff are able to identify SHEA related issues and know how to report	Organisations to demonstrate that all staff/volunteers are aware of how and what to report. This should be an outcome of the training and policies in place
<b>Leadership and governance</b>	5. 75% of the senior leadership supports and is involved in safeguarding	Promote senior leadership and buy in at all levels beginning with the CoP and enhanced engagement with IRMG
<b>Safe recruitment</b>	6. 57% include reference to safeguarding as an organisational priority in all job adverts and role descriptions	All organisations to make clear at the beginning of the recruitment process the zero tolerance to any abuse and to do no harm
	7. 73% carry out background checks for staff during recruitment	All organisations to conduct comprehensive recruitment and vetting processes
<b>Reporting Processes</b>	8. 57% have reporting mechanisms in place for beneficiaries and communities to report	All have strategies in place that demonstrate accountability to communities and ensure there is evidence of how to report. Consult with beneficiaries
	9. 73% of organisations report SEAH concerns to senior leadership	Organisations to demonstrate accountability at the highest level. All concerns should be reported at the highest level. Bi annual reports on cases can also be reported to IRMG

<b>Investigations</b>		10. 61% of investigations are conducted by experienced and qualified personnel)	IRGM to scope out a dedicated pool of investigators that could be utilised as a shared pool of investigators and to provide training to skill up potential investigators. On-line training can also be utilised
<b>Assistance referral</b>	<b>and</b>	11. 61% have survivor systems in place	Focus on preventing so a plan is in place before an incidence occurs. Map the formal and informal services including key referral organisations and survivor support services. Work collectively with key agencies and learn from other organisations who may already have done this
<b>Safeguarding management</b>	<b>Risk</b>	12. 50% are able to assess safeguarding risks across activities	Safeguarding risk assessment needs to be incorporated in all work with vulnerable communities. It can begin with assessing the potential risks in staff, risks to the communities we work and risks to consider when designing programmes
<b>Contractors and other third parties</b>		13. 73% have SG clauses in contracts and partner agreements	All agreements and contracts are required to have clauses and to ensure that obligations are passed on. Many INGOs have good examples of clauses that they can share.

## Appendix 3: Self-assessment Tool Results

Internal Risk Management Group - Safeguarding Self-Assessment Tool Analysis		Rating Grid 2 = Yes 1 = In Progress 0 = No
Safeguarding Standards	<b>1. Safeguarding Policy</b>	
	1. Does the organisation have an overarching Safeguarding Policy that describes who it applies to (e.g., staff, volunteers, partners, consultants), appropriate standards of behaviour, recruitment, reporting, monitoring, investigation and discipline measures?	2 = Yes 84% 1 = In Progress 7.69% 0 = No 3.84%
	2. Does the Policy specifically reference children and define them as being below 18 years of age?	2 = Yes 84% 1 = In Progress 7.69% 0 = No 7.69%
	3. Is there a designated focal point who has clear safeguarding responsibilities?	2 = Yes 65% 1 = In Progress 15% 0 = no 7.7%
	4. Do all staff and volunteers receive mandatory safeguarding training, including training on the policy?	2 = Yes 69% 1 = In Progress 19% 0 = No 7.69%
	5. Do staff know how to identify abuse/exploitation and how to report concerns, disclosure, allegations or suspicion of harm? If no, what areas would you like to be included in training provided by IRMG?	2 = Yes 61% 1 = In Progress 26% 0 = No 3.84%
	<b>2. Leadership and governance</b>	
	6. Do senior leadership actively promote and support safeguarding and visibly encourage a culture of raising concerns at the earliest point?	2 = Yes 76% 1 = In Progress 23% 0 = No
	<b>3. Code of Conduct</b>	
	7. Does the organisation have a clear Code of Conduct that applies to all personnel and is linked to disciplinary procedures?	2 = Yes 84% 1 = In Progress 7.69% 0 = No
	<b>4. Safe recruitment</b>	

	8. Does the organisation include reference to safeguarding as an organisational priority in all job adverts and role descriptions relating to working with, or access to, vulnerable groups?	2 = Yes 57% 1 = In Progress 19% 0 = No 19%
	9. Are new personnel subject to criminal records checks or other background checks where appropriate, prior to taking up their role?	2 = Yes 73% 1 = In Progress 23% 0 = No 7.695%
	<b>5. Reporting Processes</b>	
	10. Does the organisation have mechanisms and procedures for beneficiaries and communities, including children, to report SEA allegations that comply with core standards for reporting (i.e., safety, confidentiality, transparency, accessibility, survivor focused)?	2 = Yes 57.7% 1 = In Progress 34% 0 = No 7.69%
	11. Does the organisation monitor reported cases and submit a regular report to Senior Leadership team with key recommendations for improvement?	2 = Yes 73% 1 = In Progress 30% 0 = No 3.84%
	<b>6. Investigations</b>	
	12. Are investigations undertaken by experienced and qualified professionals? Please provide further detail on investigation capacity, including if it meets standards and is survivor focused?	2 = Yes 61% 1 = In Progress 23% 0 = No 7.69 %
	<b>7. Assistance and Referrals</b>	
	13. Does the organisation have a system to ensure survivors of SEA, including children, receive immediate professional assistance and referred to qualified service providers?	2 = Yes 61.5% 1 = In Progress 23% 0 = No 3.8%
	14. Are internal and community based referral mechanism in place?	2 = Yes 57% 1 = In Progress 30% 0 = No
	15. Are systems for reporting confidential, user-friendly and accessible to the most at risk?	2 = Yes 57% 1 = In Progress 34% 0 = No 3.8%
	<b>8. Safeguarding Risk Management</b>	
	16. Does the organisation have a process for assessing safeguarding risk across all activities?	2 = Yes 50% 1 = In Progress 34% 0 = No 11.5%





9. Working through contractors and other third parties		
	17. Does the organisation's contracts and partnership agreements include a standard clause requiring contractors, suppliers, consultants and sub-partners to commit to a zero-tolerance policy on SEA and to take measures to prevent and respond to SEA?	2 = Yes 73% 1 = In Progress 3.84% 0 = No 7.69 %

## Appendix 4: Online safeguarding resources

- The Safeguarding Resource and Support Hub has excellent free resources. A good place to start for a general overview on safeguarding would be to explore their safeguarding journey. See here: (<https://safeguardingsupporthub.org/journey>). This guides users through relevant information, materials and services hosted on the Hub. It recognizes that each organization is on its own safeguarding journey and will require different information, materials and services at each stage of that journey.
- Other free providers include: <https://www.disasterready.org/> (they partner with NGOs, leading agencies, and experts in humanitarian aid and development to make online learning available for free).
- Kaya offers hundreds of courses across a range of topics, from the humanitarian basics, to programmatic and technical sectors, through to personal and professional development. These courses are made up of a number of engaging learning activities and resources, including self-directed learning packages, videos, documents, games, quizzes, live MOOCs and webinars, registration to face-to-face training. Each of these courses are designed so they can be accessed from your phone, tablet, laptop or PC, and in the language that best suits you. They can be accessed without an internet connection using the Kaya Mobile app, available on Android and iOS. <https://kayaconnect.org/course/info.php?id=2704>
- The CHS alliance provides training at a cost, including comprehensive Investigations training. <https://www.chsalliance.org/about/training/>

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