

Written evidence submitted by Christian Aid

Introduction

Christian Aid is a Christian charity that insists the world can and must be swiftly changed to one where everyone can live a full life, free from poverty. We work globally in around 40 countries for profound change that eradicates the causes of poverty, striving to achieve equality, dignity and freedom for all, regardless of faith or nationality. We provide urgent, practical and effective assistance where need is great, tackling the effects of poverty as well as its root causes.

Christian Aid welcomes this opportunity to respond to the inquiry into sexual exploitation and abuse in the aid sector. For any further information please contact Simon Kirkland, UK Parliamentary and Political Adviser, skirkland@christian-aid.org, 020 7523 2164.

Summary

1. Christian Aid takes the issues of sexual harassment, abuse and safeguarding extremely seriously. We set up our gender security training because it was raised by staff in staff surveys, and we have been proactively training staff, partners and volunteers, and establishing procedures and policies to tackle these issues since 2012. There is never any room for complacency and are always seeking improvements in our culture, policies and practice.
2. We commend the excellent research and work of Report The Abuse who have provided invaluable insight, advice and expertise on this topic in the humanitarian sector specifically. They find, for example, that 87% of humanitarians know a sexual violence survivor in the sector; only 17% are satisfied with complaint handling; whilst 20% of humanitarians who reported sexual violence identified as LGBTI. These statistics indicate the extent and seriousness of the problems, and the need for all organisations, donors and development actors to work together to address them.
3. We are concerned that the discussion on safeguarding so far has been predominantly UK focused, and has not sufficiently involved beneficiaries, survivors, or local and national organisations across the global south. Most of the Christian Aid/ACT Security training we run is in the global south with various trainings across regions every year.
4. We recognise that no society or culture is immune from sexual abuse and abuse of power. We acknowledge the extent of patriarchal cultures within our organisations and sector which enable harassment and sexual abuse to go unchallenged. Until our organisational cultures of staff-to-staff relationships are fully and openly addressed, we fear we will not see the necessary change in staff-to-beneficiary relationships.

5. We strongly emphasise the importance of the localisation agenda that gives greater attention to local and national actors and beneficiary accountability, commitments made at the 2016 World Humanitarian Summit which are only now influencing mainstream humanitarian practice.
6. We note that there needs to be particular support for LGBTI aid workers.
7. We recommend the Committee should treat the Core Humanitarian Standard (CHS) as the primary standard for safeguarding and accountability in humanitarian and development contexts, ideally with third-party audit by the Humanitarian Quality Assurance Initiative. This could be supplemented by additional standards specific to safeguarding but these should complement, not replace or duplicate, existing mechanisms. The CHS provides a “level playing field” upon which all agencies can demonstrate adherence to a common global standard. Christian Aid would be disappointed if there was a proliferation of new or single-country standards or mechanisms unless there is a specific and well-evidenced justification.
8. Donors such as DFID have a role in establishing and embedding best practice across all actors in the sector, both by setting norms and standards – including specific PSEA (Protection against sexual exploitation and abuse) requirements and guidelines – and by supporting institutional capacity-building especially for smaller organisations.
9. Donors, NGOs, Parliamentarians and the media all have responsibilities in encouraging a culture that supports survivors of sexual violence, and improving the culture of reporting. Some practices, e.g. among donors, may be inadvertently discouraging transparency and reporting.
10. As ODA is delivered by many departments beyond DFID, any standards and requirements must be implemented across government, and to all development actors regardless of sector.

1.1 Introduction

1.2 As a faith-based charitable organisation, the dignity of all people is at the heart of Christian Aid’s purpose. We believe that human beings are created in the image of God, and that we should use our power, skills and resources for the good of all. Honest, transparent and trust-filled relationships are the cornerstone of our organisation. Like others, we have been horrified by the recent revelations and we hold the trust that is placed in us by a wide range of stakeholders – beneficiary communities, staff, partners, and donors – in the highest regard and we seek to uphold that trust in all that we do. We are committed to making any and all improvements that will enable Christian Aid to continue to tackle the scandal of poverty. We consider safeguarding to be a fundamental aspect of how we treat people as beneficiaries, employees and volunteers: with respect, mindful of their rights and certainly, doing no harm.

1.3 We have engaged proactively in the recent request from DFID to reassure the Secretary of State of our full compliance with safeguarding measures and were

pleased to participate in the recent Safeguarding Summit. We have worked to communicate with staff and partners and all historic reports/allegations have been fully investigated, submitted to the Charity Commission where necessary, and our sub-committee of the Board of Trustees (Audit & Risk Committee) has been kept fully informed. We have continuously sought to establish a supportive and effective safeguarding culture including policies, procedures and training, both before February 2018 and since then. We have drawn on expertise elsewhere through the Churches Child Protection Advisory Service (CCPAS). We have clear statements and information on our website. We will be shortly appointing a full-time staff member for safeguarding and will continue to work closely with other agencies in following up the outcomes of the Safeguarding Summit.

2.1 Identifying the scale of abuse

2.2 There has been a rise in reported sexual violence incidents in the sector, but we are also aware that it is an under-reported issue. The reasons for under-reporting are similar to those across wider society, but as an organisation that seeks to empower people and tackle inequality, we believe these should be addressed head on.

2.3 There is a horrifying scale and intensity of gender-based violence in many countries where we work. Many international development programmes seek to address and reduce this, whether by addressing social norms, implementing humanitarian protections, or otherwise seeking to protect and restore dignity to vulnerable people. This work has important lessons and models of best practice that must be widely shared across the sector.

2.4 Christian Aid seeks to stay abreast of the latest research on this issue. We commend the excellent research and work of *Report The Abuse* who have provided invaluable insight, advice and expertise on this issue in the humanitarian sector specifically.¹ Some important insights from *Report the Abuse* (relating to the whole humanitarian sector, not to Christian Aid) include:

- 87% of humanitarians know a sexual violence survivor in the sector
- 20% of humanitarians who reported sexual violence identified as LGBTI
- Only 17% are satisfied with complaint handling
- 1,200+ individuals have come forward to recount incidents of rape, assault and harassment. In 44% of these cases, the perpetrator was another international colleague.
- 96% of responders to Report the Abuse's survey are expatriates – which raises questions about the lack of data and reporting from national staff.

2.5 Christian Aid has sought to bring this and other evidence to wider public and sector attention well before the latest media attention to the issue, and we have specifically named issues of silence and underreporting within the sector as problems we all need to address.²

¹ <http://reporttheabuse.org/>

² See for example, [Christian Today – Rape & abuse: the aid sector's conspiracy of silence](#) (21 September 2015); [Guardian – What we need to do to prevent sexual violence & harassment](#) (18 November 2015);

2.6 Christian Aid set up gender security training and Women's' Security training 2011/12 in response to concerns of staff in our Security, Resilience and Wellbeing Survey. We have included gender security – as one aspect of safeguarding focused on individual prevention – within our established programme of staff and partner security training. We have run a 'train the trainer' scheme internally since 2012 to recruit and establish a pool of gender-aware security trainers as one means to empower people to report. In running our own training, we sought the advice of others such as *Report the Abuse*. The aforementioned statistics are used in our training and practice to help staff to understand the scale of the issue and guide our focus areas. Most of the Christian Aid/ACT Security training we run is in the global south with various trainings across regions every year, for our own offices, other ACT Alliance members and our partner organisations.

2.7 While many organisations collect data on security incidents, we note a need for security data to reflect how men/women and LGBTI people experience such incidents differently. Most security data has been gender blind, and sexual violence is often missed out from data capture when other incidents (kidnapping, theft, etc) are recorded. This is starting to be recognised.

2.8 We note that there needs to be particular support for LGBTI aid workers because of the shocking reality that 20% of humanitarians who reported sexual violence identified as LGBTI. With 40 per cent of the world's population living in countries where LGBTI people can face imprisonment, the sector must proactively address LGBTI risks for staff, both local and international.³ We welcome the work of Organisations like *Stonewall* and *LGBTI Aid and Development Workers* which offer immense support to staff, and hope this support becomes mainstream across all organisations.

3.1 Reporting abuse

3.2 Ultimately the heart of the solution must be creating and nurturing a culture in which harassment, abuse and exploitation are never acceptable, where reporting such acts is encouraged and facilitated, and where policies are fully and effectively implemented and monitored for effectiveness.

3.3 Christian Aid has been actively training partner organisations on the CHS (see below) which includes establishing complaints and response mechanisms for safeguarding concerns from beneficiaries.

[Guardian – Aid workers & sexual violence – Survivors speak out](#) (17 February 2017);
[Reuters – Risk faced by LGBTI humanitarians deserve better consideration](#) (19 August 2017).

³ Inclusion and security of LGBTI aid workers, report by RedR UK and EISF, 2016.
<https://www.redr.org.uk/RedR/media/RedR/Training%20and%20Learning/Resources/LGBTI%20Inclusion/RedR-and-EISF-2016-REPORT-INCLUSION-AND-SECURITY-OF-LGBTI-AID-WORKERS-WORKSHOP-22-01-2016.pdf>

3.4 We recognise that staff and beneficiaries face the same barriers when reporting abuse and/or whistleblowing in our sector as in wider society. We appreciate that staff and beneficiaries often fear repercussions if they do report, which include for instance: beneficiaries losing assistance; staff losing their jobs; their organisation losing funding or otherwise being penalised. Such fears further entrench the guilt and shame a survivor of sexual violence often feels.

3.5 Many organisations have mechanisms in place which often adopt the good practices used in financial accountability: policies and procedures, reporting spaces (such as to trustees/committees), confidentiality, clarity on what happens with reporting, annual reporting of incidents both internally and to regulators such as the Charity Commission. Ensuring that such procedures are clearly and regularly communicated to staff, beneficiaries and partners is one important aspect of addressing the issue.

3.6 We recognise that beyond policies and procedures, culture change is the most important factor we must all collectively pursue. Donors, NGOs, Parliamentarians and the media all have to recognise and respect their responsibilities in encouraging a culture change that prevents sexual abuse, ends impunity, supports survivors (including in feeling able to report), and strives for continuous improvement. For instance, current trends which favour reporting only positive outcomes to donors rather than a more holistic approach impedes individual and organisational willingness to report, and contributes to a culture that discourages honest reporting.

4.1 Tackling abuse & exploitation and awareness of it within the context of security/training

4.2 While we do not view safeguarding as something that can be addressed by personal security alone, one strand of Christian Aid's policy places individual prevention within the context of security. Indeed, at a recent security session in Myanmar, staff put sexual harassment and violence as one of their top five security threats. Working with ACT Alliance, we are planning to run specialised training sessions for senior staff and security focal points to help them recognise the barriers staff, partners and beneficiaries face, identify how practices can be improved, and understand other sensitivities when addressing gender security issues. Our staff who have received training can act as focal points for colleagues wishing to express concerns or report incidents. Gender security is now covered as a standard part of our general security training.

4.3 We have run Christian Aid gender security "train the trainer" scheme for staff since 2012 and had a pool of global trainers running trainings on sexual violence and harassment with expertise in dealing with safeguarding issues. We have been working with the global ACT Alliance Security Community of Practice since 2014. We introduced an LGBTI module in the past year and ran a gender security week in Bangkok with an LGBTI trainer to deliver a session on this important topic. We run regular interactive trainings throughout the year for Christian Aid and other ACT members and partner organisations on topics such as threats to men, women and LGBTI staff; sexual violence and harassment; current trends

and research; reporting; risk assessments; and resources to support colleagues. We have conducted UK training for volunteers and those working remotely.

4.4 We have developed Gender Security Guidelines for all staff to introduce the different risks men, women, and LGBTI staff face, how to mitigate them and which support resources can be accessed.⁴ We believe – though have not confirmed – that Christian Aid was among the first in the sector to produce specific guidelines for LGBTI staff, and would encourage all organisations to do so.

5.1 Learning lessons and best practice

5.2 Following on from the Safeguarding Summit, there are five working groups looking at different aspects of safeguarding. We recommend the Committee should seek input from these groups when they report back in late April.

5.3 To ensure that recommendations around improving safeguarding are not gender blind but will redress gender injustices and result in deeper and lasting change, we commend the expertise in the *Gender & Development Network* (of whom we are members) to advise the Committee on this further.

5.4 We believe the Committee, DFID, other donors and the international development sector should unite to strengthen and use existing mechanisms rather than create new standards, mechanisms, or multiple approaches. Any solutions should be globally agreed and globally applicable given the international nature of development work.

5.5 We therefore recommend the focus should begin with the CHS, and encourage the Committee to give greater acknowledgement and support for this globally recognised, industry-wide standard going forward. The CHS provides an industry-wide standard on quality and accountability which is focussed on key actions in international programme work and the supporting organisational responsibilities to implement those actions. The CHS mainstreams PSEA as well as providing specific provisions related to PSEA, Safeguarding, Codes of Conduct, and complaints and reporting mechanisms within a holistic set of standards for best practice.

5.6 The CHS is a verifiable standard, with verification options including both first or third-party assurance. Membership of the CHS Alliance requires regular first or third-party assurance and the Disasters Emergency Committee (of which Christian Aid is a member) requires its members to have independent assurance against the CHS.

5.7 CHS is a broad quality and accountability framework for work with people and communities internationally and has been applied successfully in many contexts. Many agencies, including Christian Aid, apply it across both their development

⁴ These guidelines can be seen at http://www.act-security.org/download/Gender_Security_Guidelines_2017.pdf

and humanitarian work, and do not limit it to purely humanitarian contexts for which it was named.

5.8 As a valuable complement to the CHS to provide a specific framework for PSEA, we recommend the Inter-Agency Standing Committee (IASC) PSEA Minimum Operating Procedures (MOP) which, though not as widely known, provides specific international standards on safeguarding. We recommend that all organisations should use this as the guiding framework and use it to report on progress.

5.9 We also commend to the Committee's attention the Humanitarian Quality Assurance Initiative (HQAI) based in Geneva. This is an independent professional body responsible for certification and verification against professional standards and it audits organisations for certification/verification against the CHS. An HQAI audit, which Christian Aid has undergone, involves document reviews; interviews with staff and partners; interviews with communities and affected people; interviews with other stakeholders; and direct observations of selected country programmes in the field. These assess not only if mechanisms are in place to identify gaps and weaknesses but also, in case of identified breaches, if adequate measures to correct and redress the issue are implemented. Unfortunately, at present HQAI is a purely voluntary scheme and is not widely known outside of the humanitarian sector, even within DFID. Certification is not sufficiently understood or supported by donors, nor does it link to donor funding e.g. certified agencies are not considered a more attractive proposition for donors.

5.10 HQAI's CHS audits demonstrate best practice in how to conduct third-party assurance of quality and accountability in agencies with diverse and dispersed governance models, e.g. federated, affiliated, confederated agencies. We suggest the Committee explores this further when considering what a PSEA assurance model could look like.

5.11 Recognising that some smaller organisations sometimes need support to implement a full range of CHS measures, we have taken responsibility for supporting our partner organisations to implement the CHS. We maintain that all organisations, large and small, can implement the CHS given there must always be enough measures in place to ensure the protection of staff, volunteers and beneficiaries. In this regard we suggest that CHS provides a "level playing field" upon which all agencies can demonstrate adherence to a common standard thereby removing any perception that "only the big agencies" can deliver quality.

5.12 We believe the Committee should treat the CHS as the primary standard for safeguarding and accountability in humanitarian and development contexts. If the Committee choose to recommend a particular safeguarding and accountability model as a requirement for DFID/ODA funding, we suggest the CHS is a good choice. Christian Aid would be disappointed to see a proliferation of new standards and mechanisms unless there is a specific and well-evidenced justification.

6.1 Cultural change

6.2 As highlighted already, the biggest and most pressing challenge is to build a stronger culture that is open to challenge, to change, that prevents abuse, ends impunity, supports survivors better and facilitates full and open reporting.

6.3 We have to acknowledge the extent of patriarchal cultures within our organisations and in our sector, which enable harassment between staff to go unchallenged, or that have ignored and/or made light of harassment on the grounds of organisational or wider culture. Until our organisational cultures of staff-to-staff relationships are fully and openly addressed, we fear we will not see change in staff-to-beneficiary relationships.

6.4 We must also recognise that no society or culture is immune from sexual abuse and abuse of power, and therefore we must critique and challenge attempts to characterise these issues as a problem unique to one particular sector, culture, nationality or organisation.

6.5 During the process of Christian Aid strengthening our internal gender policy, we undertook an organisational self-assessment which highlighted issues such as the need for improvements in HR, support for those reporting, and better safe spaces within the organisation. All these were acted upon, but we believe further improvements can still be made, such as: include questions around willingness/ability to report incidents in feedback mechanisms such as staff surveys; review and revise the online security module; ensure all country plans include specific gender security risk assessment; etc.

6.6 We are seeking to build a culture whereby moral accountability (whether we do right by people) is seen alongside financial accountability (whether we use money right) because both represent abuses of power that fundamentally contradict our values and undermine our collective and individual efforts to address poverty, alleviate human suffering and treat people with respect and dignity. We take our organisational values and Code of Conduct very seriously. For example, our most recent dismissal for sexual misconduct (2017) was for a violation of our values (as expressed in our Code of Conduct), not for a criminal act (the acts were not criminal in the national context, nor would they be in the UK). It is essential to actively express the underpinning values of the organisation in all we do and translate them into practical frameworks that can be applied within projects and programme and with local partners. We believe the CHS does this by providing key actions as well as organisational responsibilities.

7.1 Local leadership/empowerment of local communities

7.2 We note that the safeguarding discussion so far has been mainly UK-focused and UK-led, and we call on the Committee, DFID and the wider sector to ensure this is a fully participatory, inclusive and global conversation. We believe that the

most fundamental issue the sector must face is addressing the power imbalances between organisations and beneficiaries, whether individuals or organisations.

- 7.3 We recommend that national and local organisations, and survivors, are brought into this global conversation to shape the requirements and mechanisms to ensure that they are fit for purpose in the contexts where development actors work. This is particularly relevant to protect the safety of survivors in those contexts where laws or practices may end up punishing survivors rather than perpetrators. Most of the Christian Aid/ACT Security training we run is in the global south with various trainings across regions every year, but there is much further to go.
- 7.4 We cannot express strongly enough the importance of the commitment, made at the 2016 World Humanitarian Summit, to the localisation agenda across aid, development and humanitarian response. The following suggestions indicate some of the ways in which the localisation agenda is relevant to safeguarding.
- 7.5 Empowerment of the local community to report needs to be an active part of all programming, with explicit commitments made to communities around reprisals or other implications.
- 7.6 We are aware that national staff are much less likely to speak up and staff can be wary of official reporting mechanisms. They are more likely to confide in colleagues they trust, of the same level, so locally based focal points may prove more effective.
- 7.7 In relation to empowerment of local communities, proactive efforts are needed to ensure that beneficiaries and communities are aware of the expected and acceptable behaviour of aid workers, our Codes of Conduct, our commitments in relation to PSEA, and reporting mechanisms. All of these must be stated clearly, transparently and regularly so that communities understand what is and is not acceptable – we cannot expect communities to tell us, given the likely power imbalances.
- 7.8 Furthermore, verification against the CHS must seek and take note of affected populations' perceptions of agencies' performance, including whether they are aware of codes of conduct, commitments to PSEA, complaints and reporting mechanisms (including how complaints will be handled) and referral mechanisms. Such monitoring and verification measures can increase beneficiary accountability and potentially give survivors an opportunity to say directly whether safeguarding mechanisms are working.
- 7.9 We are concerned that there are mixed messages about the priority given to PSEA from different parts of DFID. PSEA must be mainstreamed across the entirety of DFID including a special emphasis on DFID in-country offices which should show leadership by taking the lead on national level PSEA discussions, and by creating space for NGO forums and southern organisations to explore and collaborate on PSEA.

8.1 DFID's role

- 8.2 We appreciate the actions DFID has taken so far, and the robust but collaborative approach it has taken with the sector and stakeholders to find solutions to these problems together.
- 8.3 DFID can take a greater role in ensuring that all agencies have safe, responsive, functioning complaints and feedback mechanisms for sexual exploitation and abuse (SEA) and safeguarding accessible for staff, partners and beneficiaries including the hardest to reach who are most at risk of SEA.
- 8.4 DFID should seek assurance from its partners through annual reporting at project level that complaints are being heard and responded to by asking for trend analysis to assure that agencies have functioning mechanisms.
- 8.5 Donors such as DFID have a role in establishing and embedding best practice across organisations, both by setting norms and standards and by also supporting institutional capacity-building so that agencies can deliver the highest quality. To support the roll out of the International Aid Transparency Index (IATI), DFID decided to resource capacity strengthening for downstream partners to strengthen IATI compliance on a project-by-project basis. This effective roll-out showed improvement in standards, and we would recommend donors consider a similar model to address PSEA and Safeguarding, especially for downstream partners who operate where the risks are greater and the institutional capacities often less.
- 8.6 Whilst there has been a clear expectation about reporting significant incidents to the Charity Commission, DFID should be explicit about their requirements for PSEA and Safeguarding reporting. These should be stated clearly in funding agreements and provide sufficient assurance, guidance and support on reporting and investigations, including investigation support for small agencies or those without qualified staff to ensure a robust process.

9.1 ODA

- 9.2 The Committee should consider the question of whether ODA is only contracted to NGOs and other development actors, including private sector actors, who can demonstrate adherence to industry-wide, international quality standards, such as CHS.
- 9.3 Recognising that UK ODA is increasingly spent by other government departments beyond DFID, we believe the UK Government must put in place measures to ensure that all recipients of ODA are demonstrating their adherence to these standards, irrespective of funding instrument.

10.1 The Charity Commission

- 10.2 Recent events have raised the question about whether the Charity Commission has the capacity to respond to all the cases that are notified to them. As the Charity Commission only relates to UK-registered charities, it is the relevant regulator for reporting and supporting investigations of UK registered charitable bodies and their downstream partners. However, when it comes to safeguarding concerns in non-charitable organisations funded by UK taxpayers and donors, or in-country issues, the Committee should seek advice from other bodies such as HQAI (see section 5.10 above).

11.1 Legislative proposals

- 11.2 We are open to dialogue around legislative change, but along with other BOND members, we are not currently convinced that there is a clear need to legislate to the extent implied in the draft bill or to amend the International Development Act. Our primary duty is to the beneficiaries of aid, therefore ensuring that the necessary standards and systems are adhered to and embedded in practice should be our first priority. We suggest that this could be achieved – and would be more effective – first through appropriate and robust due diligence processes, which respect and build on the CHS, internationally agreed humanitarian principles and standards that are already in place and that exist to guide the delivery of humanitarian and development work.
- 11.3 Christian Aid would welcome changes in the legal framework that made it possible for employers to seek and to offer references that disclose that an individual has been the subject of disciplinary action (action as distinct from investigation) for sexual exploitation or abuse. We support the intent of proposals to ensure data protection measures are clarified so that organisations are able to share information better, especially negative references. We are aware that, in addition to information sharing between organisations, there are impediments to data flow within organisations that do not always support action being taken, sometimes on the basis of alleged “confidentiality”.

12.1 Reputational risk

- 12.2 We recognise that there are serious reputational risks facing the sector in relation to partner and local community relationships, as well as confidence of national governments in the countries where we work. It is important that the UK government works collaboratively with the sector to find proper solutions to these problems and, whilst being robust, also stands up for the UK development sector in the face of questions from other governments that could justify actions that impede humanitarian access, constrain civil society space, and reduce the effectiveness of aid and development.

12.3 In common with many charities, Christian Aid believes that trust is crucial to sustaining the support of our individual donors and our ability to raise money and raise voices at community level across the UK. Evidence from our supporter complaints and feedback in the weeks since the safeguarding stories hit the media headlines suggests that there is not a significant concern directed immediately at Christian Aid. While we are reassured, we are not complacent. We have sought to communicate openly and transparently the issues faced and our actions in ensuring safeguarding in our programmes and among our volunteers in order to respect the trust they place in us and maintain such high levels of trust in the future. We are using our website to keep information up-to-date and to ensure transparency remains a hallmark of our organisational reputation.

12.4 We know that to expose the scandal of poverty, challenge and change the systems and structures that keep people poor, and to be effective in mobilising people to be agents of change (whether through engaging with government, leading change in business or in raising money and voices at a local community level), Christian Aid must be confident and clear in the invitation we make to our supporters. It is important in achieving our charitable purpose that we do not reduce our voice or feel unable to speak out on important issues, even in the face of criticism or reducing trust.

12.5 We expect the underlying level of trust is most likely to be tested in the public fundraising moments in which we engage, for example the DEC appeals and the forthcoming Christian Aid Week in May. In such moments, the sector stands on its collective reputation. We will only be able to assess the ongoing impact on these moments in the months that follow.