FROM AN OMBUDSMAN TO A HUMANITARIAN PASSPORT: HOW SHOULD WE BE ADDRESSING ABUSE IN THE INTERNATIONAL AID SECTOR?

> **What do recent sexual exploitation and abuse scandals in the global aid sector mean for Australian actors seeking to address these issues?**

INTRODUCTION

Tackling sexual abuse and exploitation in the aid sector has never been so crucial. The revelations of sexual misconduct by Oxfam Great Britain staff in Haiti and exposure of an abusive organisational culture at Save the Children UK have prompted an important global conversation on addressing sexual abuse and exploitation. Concrete suggestions have ranged from calls to establish new safeguarding processes such as global registers and more rigorous reporting mechanisms, to better policies and independent mechanisms such as a humanitarian ombudsman and even a Special Court. There is momentum in the humanitarian sector for

transformational change. The humanitarian #MeToo movement, #AidToo, has seen an outpouring of revelations of not only sexual exploitation and abuse amongst staff in the sector, but also the abuse of power between those who give life-saving assistance and those who have a right to receive it.[1]

This think piece explores key issues in relation to safeguarding and raises questions about what recent developments mean for the Australian context. It is intended to contribute ideas and promote thinking about how the Australian aid sector can both learn from and influence global conversations and action.

Considerations for the Australian aid sector

From ombudsmen to passports, what does this mean for Australia as we seek to harness the momentum for change? See 'Priorities for Australia' section.

1 **Initiate sector-wide dialogue and approach**
We need to have honest, difficult and challenging conversations about how we operate as humanitarian organisations.

2 **Take advantage of the opportunity for transformative change** - Explore ways to promote integrated and coordinated approaches to safeguarding.

3 **Increase transparency**
Commit to reporting on sexual misconduct publicly both in Australia and in aid program host countries.

4 **Consider the role of donors**
Explore the ways in which donors can influence and support safeguarding initiatives to promote improved practice.

5 **Strengthen the safeguarding roles of in-country partners**
Initiate discussions and dedicate resources and support for in-country partners to strengthen prevention and accountability.

HUMANITARIAN ADVISORY GROUP

Safeguarding – what do we mean?

The international aid sector uses the term 'safeguarding' to mean 'protecting staff from harm and from harming others'. It is an umbrella term that covers preventing and addressing exploitative, harmful and abusive behaviours and practices, and the associated processes, initiatives, frameworks and policies. Safeguarding also involves organisations maintaining policies, procedures and trusted mechanisms through which those who observe or experience abuse can raise concerns – either directly or anonymously.[2]

WHAT DO WE KNOW?

Publicly available data on the extent of sexual exploitation and abuse in the aid sector is patchy. Organisations have developed and established a range of safeguarding initiatives designed to prevent incidents and respond appropriately if prevention fails. Recent revelations make it clear that these are inadequate.

Prevention – policies and standards

Policy and operational tools designed to improve safeguarding (in particular the prevention of sexual abuse and exploitation) in the humanitarian sector address quality assurance and accountability and promote common technical standards. Organisational policies and regulations are aligned with domestic legal requirements, and multiple approaches and policies exist at the organisational, national and sector levels. The table below gives a snapshot of these tools.[3]

Snapshot of safeguarding policies, standards, mechanisms and tools

Level	Policies and standards	Mechanisms and tools
Organisational	• Prevention of sexual exploitation and abuse (PSEA) policies • Whistleblowing policies • Child protection policies • Human resources recruitment and employment policies • Gender equality and diversity policies • Codes of conduct	• PSEA training • Gender and inclusion training • Safeguarding units • Complaints mechanisms and hotlines • Contracting agreements • Risk assessments • Internal audits and reviews
National	• NGO umbrella bodies, e.g., the Australian Council for International Development (ACFID) and its Code of Conduct • Domestic legal frameworks	• Donor government contracting requirements • Government accreditation requirements • Government aid risk management units • National charity commission investigations • Risk assessments • Government spot checks
Sector / international	• International legal frameworks • Red Cross & Red Crescent Code of Conduct • Sphere Standards • Core Humanitarian Standard and Humanitarian Charter • Inter-Agency Standing Committee (IASC) Minimum Operating Standards on protection from sexual exploitation and abuse (PSEA) by own Personnel • IASC Guidelines on Minimum Operating Standards for PSEA • Minimum child protection standards • Professional standards for protection work	• Humanitarian Quality Assurance Initiative • Professionals in Humanitarian Assistance (PHAP) Credentialing Program • IASC PSEA Taskforce • UN Secretary-General's Bulletin on special measures for protection against sexual exploitation and abuse • Interpol investigations

Accountability – reporting and transparency

Accountability encompasses reporting and transparency as well as legal actions and justice mechanisms to address violations. Since the revelation of extensive sexual abuse and exploitation in Bosnia and Herzegovina by peace operations personnel in the 1990s, aid agencies have collected data on these topics. Various public and agency reporting mechanisms – as well as independent research – inform us about the extent of sexual exploitation and abuse in the aid sector.[4]

Organisational level

At the organisational level, external reporting processes are context specific but most rely on agencies self-reporting data either to the public or regulatory bodies. Several international NGOs include data on sexual exploitation and abuse in their public annual reporting; Oxfam and others have been doing this for years, whilst other agencies have only begun to do so more recently.[5] Humanitarian agencies also use internal reporting and complaints handling processes through human resources systems, accreditation and standards initiatives such as the Core Humanitarian Standard and the Humanitarian Quality Assurance Initiative (HQAI),[6] and through reporting to independent regulatory bodies, authorities and government agencies, but this data is rarely made public. Agencies collect data in diverse ways, and use different metrics and categories in their reporting.

The United Nations accountability mechanisms include internal reporting functions that release public data such as the Office of Internal Oversight Services,[7] the annual Secretary General's Special Measures reports, and independent reviews of sexual exploitation and abuse committed by peacekeepers in contexts such as the Central African Republic.[8]

National level

Agencies are governed by an array of oversight mechanisms in their home countries, including regulations around reporting. This is made complex by different, or limited governance and reporting mechanisms in aid program host countries. Some countries, such as the United Kingdom and Australia, have established charity commissions that act as independent regulatory bodies and report publicly, and several other countries have followed suit, whilst others have established alternative systems of reporting. Commissions do not deal with allegations of abuse directly but refer them to the relevant authorities.[9] National governments also require reporting by funded agencies. There are umbrella and accreditation bodies for NGOs such as the Australian Council for International Development (ACFID), BOND in the UK and InterAction in the United States. Such bodies have different roles according to context in creating, socialising or implementing standards for reporting and addressing safeguarding issues across the sector.

Examples of INGOs that have released public data on sexual exploitation and abuse incidents for 2017[10]

The data is based on agency responses to media requests in two categories. This data is indicative, not comprehensive, as agencies collect and report on data in diverse ways, and use different metrics and categories. This makes collation and comparison challenging.

Organisation	Complaints or allegations	Staff dismissed
CARE International	28	12 dismissed /1 resignation/2 contracts not renewed/ 1 no longer works for CARE
Christian Aid	2	1
ICRC	-	21 staff members dismissed or resigned since 2015/ 2 staff did not have their contracts renewed
Médecins Sans Frontières	24	19
Mercy Corps	11	5
Norwegian Refugee Council	17	5
Oxfam	87	22
Plan International	15	8 dismissals/ 5 contracts terminated
Save the Children	35	16

Sector level

Sector-wide reporting and transparency initiatives include one-off initiatives implemented in particular humanitarian contexts, such as the 2002 UNHCR and Save the Children report on the prevalence of sexual exploitation and abuse in West Africa. Some independent research has also explored sexual exploitation and abuse across the sector.[11] Global reviews have focused more on the implementation of PSEA standards and initiatives, such the 2010 Inter-Agency Standing Committee (IASC) Global Review of PSEA by international humanitarian personnel. There is no independent international mechanism or body that deals with reporting or transparency for safeguarding issues.

Whilst recent revelations have prompted some increase in transparency of reporting, the issue of publicly available data is key. Data is either not collected or reporting is self-regulated and rarely published. Despite the initiatives and mechanisms outlined above, we lack a clear picture of the extent of the issue at the sector level. This has led to calls for an overhaul of reporting mechanisms and for reports to be publicly released.

Transparency: the benefits outweigh the risks

Improving transparency and increasing public reporting by all humanitarian actors would generate a clearer picture of the issue, and the processes put in place to resolve it. It would also allow for more accurate reporting by the media, and for NGOs to undertake united advocacy around safeguarding issues. Increased transparency would also help vulnerable groups to understand their rights and the behaviour they should expect from aid workers; this would reflect best practice in other sectors such as health, welfare, disability and human services. However, transparency is not without risks. Reactions to recent revelations have already had significant implications for aid agency reputations, public trust and levels of funding.

EMERGING INITIATIVES AND PROPOSALS

Emerging safeguarding proposals and initiatives are a positive step for the sector.
Calls for action generally fall into two areas:

1. Prevention – **better application of existing safeguarding standards and policies including recruitment, vetting and human resource management.**

"Since 2001, standards, policies, guidelines and tools, have been developed but their application has not been systematic and fall short in providing sufficient safeguarding measures. Leadership and resources are now needed to ensure that the CHS and related standards are adopted and that the sector – from NGOs to the UN, from donors to private sector contracts – are committed to demonstrating the application of such standards."
Open letter from CHS and HQAI [12]

2. Accountability – **Independent accountability mechanisms that support a shift away from reliance on self-regulation and reporting.**

"The problem now facing the humanitarian sector is certainly not a lack of standards or a lack of progressive learning... The problem that remains is that despite these sector-wide initiatives to hold NGOs accountable for power abuses, the initiatives all rely on the voluntary buy-in of NGOs, who ultimately retain power to independently deal with abuse."
Dorothea Hilhorst, Academic[13]

These two change areas cannot be mutually exclusive if the sector is to improve, and should not be driven only by fear of decreased funding in the absence of action.[14] In the next section we discuss the opportunities and challenges of some of the emerging global proposals and initiatives.

NEW AND PROPOSED SAFEGUARDING INITIATIVES

Prevention

1 **Improved implementation of standards and policies, including increased focus on human resources functions**

Who: Governments, INGOs, national NGOs and CHS Alliance.[15]

What: In the wake of recent revelations and scandals, donors, humanitarian standards actors national and international NGOs are taking steps to improve standards and implementation of policies, including compliance measures, vetting and recruitment procedures. NGOs, the Department for International Development (DFID), the Charity Commission and safeguarding experts in the UK convened a Safeguarding Summit on in March 2018. A joint statement was released after this meeting outlining five specific pledges to improve safeguarding standards.[16] Organisations including Oxfam, Save the Children, CARE and Médecins Sans Frontières have also made specific public commitments to addressing organisational culture and improving existing processes and establishing new ones in relation to safeguarding.

Opportunities: The sector-wide momentum to improve implementation of policies and organisational standards, reporting and accountability.

Challenges: Maintaining momentum and driving change at the individual agency level, national laws and policies on privacy, defamation and liability and the focus on administrative investigative processes rather than criminal prosecution.

2 **Improved credentialing and accreditation**

Who: PHAP and HQAI.

What: PHAP is currently testing a system of multiple-choice examinations on skills in the aid sector. The exams are designed to accredit aid workers through testing competence and suitability for specific aid jobs, general knowledge of the sector, and ethics. Individual may have their credentials revoked due to misconduct or underperformance.

Opportunities: To have an international standards and professional credentials system for aid workers by a professional body.

Challenges: Relies on individual or agency buy-in; requires an ability to interface with reporting and accountability systems. A further challenge is national laws and policies on privacy, defamation and liability, and appeals processes.

3 **UN register**

Who: UN Secretariat.

What: The register will be a screening system to prevent former employees guilty of sexual misconduct from finding new jobs with UN agencies or other charities. The register will initially cover UN employees and will eventually be made available to aid agencies and groups, and will be operational by mid-2018.

Opportunities: A single system across the UN to meet critical safeguarding recruitment and vetting challenges.

Challenges: Confidentiality, linking the system with existing UN reporting mechanisms, and addressing links with legal accountability mechanisms in Member States.

4 **The Humanitarian Passport**

Who: Save the Children.

What: Save the Children has been piloting a passport system for humanitarian and development practitioners that uses blockchain technology.[17]

Opportunity: A common system of global registration. All individuals working in international development could be registered, showing they are suitable to work in that sector and therefore could be quickly deployed, but also risk losing their license to work as a result of inappropriate behaviour.[18] This system should prevent the redeployment of staff members who have been reported to authorities, reprimanded or dismissed for sexual harassment or bullying.

Challenges: Critics have argued that this proposal is too complex to implement, has significant privacy and confidentiality concerns, and administration and jurisdiction challenges, particularly in the absence of a global or multilateral framework.

Accountability

5 The humanitarian ombudsman/international watchdog

Who: Initially piloted in the 1990s by a consortium of INGOs and Red Cross actors,[19] renewed proposals for an independent humanitarian ombudsman have come from academics such as Dorothea Hilhorst.[20]

What: An independent central authority to investigate and either sanction or initiate disciplinary procedures for those who commit offences.

Opportunities: There is currently no central and neutral authority covering all humanitarian actors; establishment of an independent mechanism would fill a critical gap in global coverage, particularly in conflict contexts or those where independent reporting functions do not exist. It could also establish links between national, regional and international laws and ensure international standards are upheld. Such a function would also allow for accurate statistics and reporting on sexual abuse and exploitation and other legal breaches.

Challenges: The key challenge is the complexity of establishing, funding and maintaining a global accountability authority.
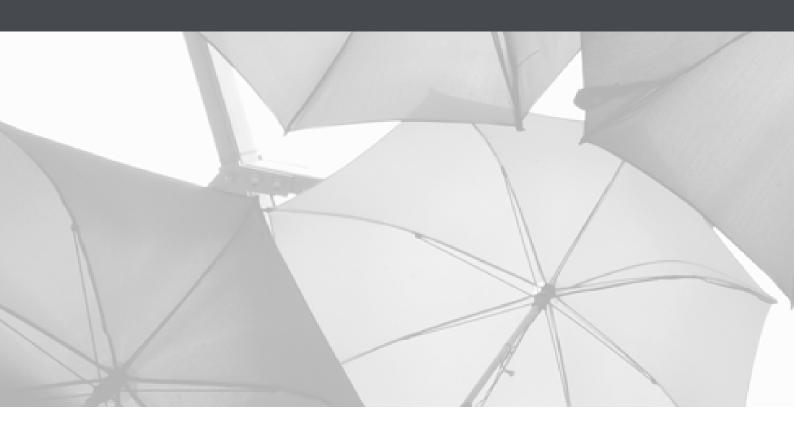
6 Independent Special Court Mechanism/Independent Oversight Panel

Who: Code Blue Campaign.

What: Code Blue has been campaigning for the creation of two mechanisms for UN actors. The Independent Oversight Panel's purpose would be to closely monitor and evaluate, in real time, the UN's response to individual allegations of sexual offenses, and make expert recommendations on UN policies and procedures. The Panel would have powers to intervene immediately when current practices or actions pose (or could pose) further harm to victims or witnesses. Within peacekeeping contexts, an independent Special Court Mechanism would take the response to sexual offenses committed by UN personnel to an independent body, and help ensure impartial justice for all involved.[21]

Opportunity: No independent mechanisms currently exist for addressing allegations of abuse in the UN.

Challenges: Securing UN member agencies' agreement to establish and participate in these mechanisms.

SAFEGUARDING IN THE AUSTRALIAN CONTEXT

The Australian aid sector has an opportunity to harness the current momentum and lead in addressing safeguarding concerns. Charities and not-for-profits in Australia are governed by domestic regulatory mechanisms and processes, including those specific to safeguarding. In the aid sector, this includes accreditation, compliance and reporting processes instituted by key bodies including the Australian Charities and Not-for-Profits Commission (ACNC), the Department of Foreign Affairs and Trade (DFAT) and ACFID.[22] In addition, Australian aid agencies have minimum standards, technical standards, codes of conduct and internal safeguarding policies.

Australian Charities and Not-for-Profits Commission

The ACNC is the independent national regulator of charities and has a role in dealing with safeguarding issues across the not-for-profit sector. ACNC registers charities, has formal investigation powers, ensures that compliance processes are met, and shares information on charities with government agencies through the Charity Passport.[23]

Australia Department of Foreign Affairs and Trade

Safeguarding role: Australian NGOs operating in the aid sector must achieve formal accreditation from DFAT in order to receive funding through the Australian NGO Cooperation Program. DFAT requires agencies receiving funding to comply with its Child Protection Policy and Environmental and Social Safeguard Policy. Issues related to safeguarding are also addressed in the Protection in Humanitarian Action Framework.[24]

Australian Council for International Development

ACFID is the peak body for Australian non-government organisations (NGOs) involved in international development and humanitarian action. ACFID member agencies agree to abide by the ACFID Code of Conduct, a voluntary self-regulated industry code of good practice. ACFID conducts monitoring and reporting on compliance with the Code in relation to safeguarding issues. It also supports agencies to meet their obligations under the Code, including updating the standards outlined in the Code, facilitating access to resources, providing advice and support, and delivering training. The independent Code of Conduct Committee also manages an independent complaints handling process.

EMERGING INITIATIVES IN THE AUSTRALIAN SECTOR

Several safeguarding initiatives are emerging in the Australia sector, including reviews, policies, pilot projects and platforms. A snapshot of these is presented below.

ACFID Reviews

ACFID has commissioned two review processes in relation to safeguarding. ACFID has also formally requested that all member agencies review and revise their sexual abuse and exploitation policies.

Review of the ACFID Code of Conduct.

Who: ACFID's Independent Code of Conduct Committee, which includes external experts.

Purpose: To review ACFID's Code in relation to safeguarding, in particular sexual misconduct, with communities, partners, staff and volunteers and determine ACFID's members' compliance with these Code requirements. The Committee will recommend amendments or updates to the Code based on its review and consider of tools and resources to assist ACFID members to meet Code requirements.

Independent review designed to improve ACFID members' prevention, and response to sexual misconduct.

Purpose: ACFID has commissioned an external safeguarding review for its 123 member agencies. The review will bring together external experts to ensure ACFID members understand and apply global best practice in the identification, response and prevention of sexual misconduct.

Focus: Adequacy of safeguarding regulatory systems, policies, procedures and measures to protect staff, volunteers, partner organisations and beneficiary communities from sexual misconduct; understanding of organisational culture and practice that prioritises effective safeguarding against sexual misconduct, data and reporting; interactions between members, their partners and federations; and limitations in addressing sexual misconduct. It will also focus on learning and sharing best practice to develop a roadmap for improving safeguarding in the Australian aid sector.[25]

Who is involved: Relevant ACFID bodies and groups, members, DFAT and ACNC.

Charity sector complaints handling model policy

Purpose: To ensure a sector-wide model policy outlining best practice for complaints handling.[26]

It is designed to ensure complaints are handled confidentially and safely, and to enhance community trust and confidence in the work of charities. Its purpose is also to ensure that the sector collects and analyses complaints data systematically to ensure lessons learnt can be applied to their charitable activities.[27]

How it works: The model policy is designed to be used as a guide for developing or updating a charity's complaint handling policy. The model procedure accompanies the policy and provides guidance to staff on how the organisation should manage complaints in accordance with its documented policy.

Who is involved: Eleven peak bodies in the charity sector.[28]

Dutyof.care

Who: Blue Bike Solutions

Purpose: A new online platform for managing and continuously verifying staff certifications that addresses the weaknesses in current safeguarding and compliance systems. The solution is designed in response to the recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse in Australia, as a secure, one-stop-shop for organisations with a duty of care for vulnerable people. It enables them to automatically verify individual staff certification requirements such as working with children checks, medical registrations, teachers' accreditations and other professional licenses and registrations.

How it works: dutyof.care uses blockchain technology to create a secure continuum of 'verification events' by storing encrypted data in a permanent, public and auditable ledger. Smart Contracts ensure the integrity of the data, forever. Alerts are sent out immediately when an issue is encountered and organisations can earn free platform credits ("VDOC Tokens") for taking an active role in the dutyof.care ecosystem.

Who is involved: More than 10 organisations are already using the platform in the private beta stage, including companies from across disability services, sports clubs, churches and performing arts. A public beta will be announced shortly.[29]

> **Pilot project for a child safeguarding digital platform**
>
> **Who:** Plan International Australia and the Digital Education Empowerment Platform (DEEP).
>
> **Purpose:** To design and trial an integrated digital platform for managing child safeguarding risks in development and humanitarian organisations. The initiative uses digital technologies to test, and improve how cognitive and behavioural patterns in organisations can be adapted to manage risk.
>
> **How it works:** The platform provides a real-time, end-to-end system that enables organisations to monitor and assess safeguarding compliance and awareness across the organisation, and to promote behaviour change to improve safeguarding.
>
> **Who is involved:** A range of organisational positions that have safeguarding roles. The project couples DEEPs corporate expertise in compliance and learning management with Plan's child safeguarding knowledge to develop a low-cost digital platform for the aid sector.

PRIORITIES FOR AUSTRALIA

1. Initiate sector-wide dialogue and approach.
We need to have honest, difficult and challenging conversations about how we operate as humanitarian organisations.

In the wake of recent events, NGOs, DFID, the Charity Commission and safeguarding experts convened a Safeguarding Summit in the UK. Afterwards, they released a joint statement outlining five specific pledges to improve safeguarding standards, including to develop strong codes of conduct and standards throughout the employment lifecycle.[30] The release of the findings of the ACFID external review will present an opportunity to bring the Australian sector together to reflect on operational issues. This could include diverse stakeholders including NGOs, the private sector, government agencies, Indo-Pacific government and civil society partners and safeguarding experts from other sectors; it would promote transparency and allow discussion of challenging issues.

Key questions

▶ What are the common safeguarding risks and challenges facing Australian agencies and their partners?

▶ How can Australian actors build on, influence and lead global best practice and knowledge? How can Australian actors build on national and state-level best practice in related areas such as child protection?

▶ How can Australian actors build up a knowledge base on common challenges in and effective approaches to safeguarding?

▶ How do safeguarding processes interact with ongoing humanitarian reform priorities such as localisation?

2. Take advantage of the opportunity for transformative change – **Explore ways to promote integrated and coordinated approaches to safeguarding.**

There is little doubt that the humanitarian system as a whole must transform its approach to safeguarding fundamentally. The challenge is to ensure a coherent approach rather than a collection of disparate and disconnected initiatives. Recent conversations have focused on the interlinking nature of safeguarding issues such as prevention, policies and standards, human resource approaches, risk management, transparency, accountability, recruitment, vetting processes – the list goes on.[31] Safeguarding approaches need to be integrated across these areas. Australian agencies can collaborate on integrated approaches to managing safeguarding through pooling resources and piloting new approaches.

Key questions

▶ What can the sector learn from other large-scale change processes in the humanitarian system, such as in fraud management?

▶ How can the sector learn from best practice in service areas such as health and welfare?

▶ How could Australian agencies collaborate on an integrated approach to managing safeguarding?

3. Increase transparency – **Commit to reporting on sexual misconduct publicly both in Australia and in aid program host countries.**

Increasing transparency and improving reporting processes is a critical step in instituting change and improving safeguarding processes.[32] This is particularly important given the myriad of actors now involved in humanitarian and development work, such as businesses, volunteer groups and diaspora groups that may have little engagement with humanitarian standards and codes of conduct.

Key questions

▶ How can Australian actors improve reporting and transparency in Australia and internationally?

▶ How can Australian actors be global leaders in this space?

4. Consider the role of donors – **Explore the ways in which donors can influence and support safeguarding initiatives to promote improved practice.**

A handful of donors globally tie funding to independent certification of aid agency compliance with standards. For example, Denmark makes independent CHS verification or certification by a third party a requirement for its strategic partners, and funds the costs of compliance, stating that this leads to better safeguarding systems. A stronger evidence base for the link between independent certification and better agency safeguarding systems is needed; nonetheless, donors are increasingly likely to require this certification in future.[33]

Key questions

▶ What roles are donor governments playing in relation to safeguarding for Australian agencies?

▶ What roles should/could they play in the future?

5. Strengthen the safeguarding roles of in-country partners.

Australia could think strategically about how to support its partners and smaller agencies operating throughout the Indo-Pacific region to improve their safeguarding, quality assurance and accountability mechanisms. This could include supporting agencies from developing countries in the region to gain accreditation through international certification processes. Coast Trust, a Bangladeshi NGO working on the Rohingya refugee response, has recently become the first agency from a developing nation to receive HQAI certification. Independent certification and audit processes can also support increased donor engagement in directing aid to local and national organisations, for example, as part of localisation processes outlined in the Grand Bargain.

Key questions

▶ What suggestions do our partners have about the way the sector should strengthen safeguarding?

▶ What approaches to strengthening safeguarding are our partners pursuing?

▶ What resources are required to ensure that partners play a strong safeguarding role into the future?

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ENDNOTES

1   Amy Costello, Women in the global aid sector are saying #AidToo, Medium, 23 March 2018 https://gpinvestigations. pri.org/women-in-the-global-aid-sector-are-saying-aidtoo-e10c42957eff   Ben Parker, MeToo AidToo: The next steps, IRIN News, 22 March 2018, https://www.irinnews.org/analysis/2018/03/22/metoo-aidtoo-next-steps

2   Adapted from UK legal definitions of safeguarding and Safeguarding in humanitarian organisations: a practical look at prevention and response, Kelsey Hoppe and Christine Williamson, Humanitarian Practice Network, April 2018. https://odihpn.org/blog/safeguarding-humanitarian-organisations-practical-look-prevention-response/#

3   For a more comprehensive overview of policy frameworks and initiatives, see Jasmine-Kim Westendorf, Discussion paper: Mapping the impact of sexual exploitation and abuse by intervenors in peace operations, December 2016 and; PSEA Taskforce website http://www.pseataskforce.org

4   Reporting on allegations, and reporting on substantiated incidences, including actions of redress are treated as separate areas in many cases.

5   For example, Save the Children use the Global Reporting Initiative G4 Framework and the NGO reporting disclosures processes. This annual report includes some data on child protection issues in Upholding our Values, Accountability and Transparency Report, 2016. Sophie Edwards, 'CARE's Lee vows to fight sexual misconduct as it reports its own problems', Devex, 21 February 2018, https://www.devex.com/news/care-s-lee-vows-to-fight-sexual-misconduct-as-it-reports-its-own-problems-92053

6   Using a network of independent auditors, HQAI assesses aid organisations, usually against the CHS standards. The process involves a management audit: interviewing staff, focus groups, project beneficiaries, reviewing documents and records in the field and at the agency's offices. See http://hqai.org

7   Data on exploitation and abuse available from Conduct in UN Field Missions https://conduct.unmissions.org/sea-investigations

8   Marie Deschamps et al., Taking action on sexual exploitation and abuse by peacekeepers, Report of an Independent Review on Sexual Exploitation and Abuse by International Peacekeeping Forces in the Central African Republic, 2015 http://www.un.org/News/dh/infocus/centafricrepub/Independent-Review-Report.pdf

9   The Charity Commission, Safeguarding is a key governance priority for all charities, regulator reminds trustees, Press Release, 5 February 2018.

10 This is a non-exhaustive list from Euro News http://www.euronews.com/2018/02/18/what-the-biggest-aid-charities-will-and-won-t-disclose-about-sexual-abuse news articles and media releases. Data includes issues of workplace harassment and SEA involving affected populations. Figures have been reported differently by agencies across their own media releases and news articles, and across different time frames. This illustrates the challenges in collecting and reporting on similar sets of data.

11 Examples include Discussion paper: Mapping the impact of sexual exploitation and abuse by intervenors in peace operations, December 2016 https://humanitarianadvisorygroup.org/wp-content/uploads/2016/06/HAG-La-Trobe__Mapping-the-impact.pdf

12 CHS and HQAI, Open letter: using the CHS to strengthen safeguarding mechanisms, March 2018, https://www.chsalliance.org/files/files/Open-letter_CHSAlliance-and-HQAI(1).pdf

13 Dorothea Hilhorst, 'Aid agencies can't police themselves. It's time for a change,' IRIN News, 22 February 2018 http://www.irinnews.org/opinion/2018/02/22/aid-agencies-can-t-police-themselves-it-s-time-change

14   See here for discussion on challenges of withdrawal of donor support https://www.independent.co.uk/news/uk/home-news/oxfam-latest-former-head-safeguarding-helen-evans-rape-sexual-abuse-women-management-charity-a8208376.html

15   The Core Humanitarian Standard on Quality and Accountability sets out nine commitments that organisations and individuals involved in humanitarian response can use to improve the quality and effectiveness of the assistance they provide https://www.chsalliance.org/what-we-do/chs

16   https://www.bond.org.uk/news/2018/03/ngos-and-government-jointly-commit-to-improving-safeguarding-standards

17   Sooraj Shah, Save the Children UK CIO to pilot a 'humanitarian passport' using blockchain, IT Pro, 16 March 2017 http://www.itpro.co.uk/strategy/28321/save-the-children-uk-cio-to-pilot-a-humanitarian-passport-using-blockchain

18   Keven Watkins, Protecting Children is the most important thing we do, Save the Children, 12 February 2018 https://blogs.savethechildren.org.uk/2018/02/protecting-children-important-thing/

19   Ian Christoplos and John Mitchell, A humanitarian ombudsman revisited? ALNAP, 15 March 2018 https://www.alnap.org/blogs/a-humanitarian-ombudsman-revisited

20   Dorothea Hilhorst, Being Good at Doing Good? Quality and Accountability of Humanitarian NGOs, Disasters, 2002, 26(3): 193-212 https://ahi06.files.wordpress.com/2006/10/hilhorst-disasters-quality-article.pdf

21   Code Blue Campaign, Special Court Mechanism Proposal http://www.codebluecampaign.com/solutions ; http://www.codebluecampaign.com/press-releases/2018/2/23-1

22   Other government agency and umbrella bodies are also involved in safeguarding processes for the charity sector, but this section deals with the three key bodies for international aid agencies.

23   ACNC, Regulating Charities http://www.acnc.gov.au/ACNC/About_ACNC/Regulatory_app/ACNC/Regulatory/Reg_approach.aspx?hkey=8251156f-f3c9-41bb-800a-304c2485be09

24   DFAT Child Protection Policy http://dfat.gov.au/about-us/publications/Pages/child-protection-policy.aspx DFAT Environmental and Social Safeguard Policy http://dfat.gov.au/about-us/publications/Pages/environmental-social-safeguard-policy-for-the-aid-program.aspx and Protection in Humanitarian Action Framework http://dfat.gov.au/about-us/publications/Pages/protection-in-humanitarian-action-framework.aspx

25   Review Terms of Reference https://acfid.asn.au/sites/site.acfid/files/ACFID%20Prevention%20of%20Sexual%20Misconduct%20Review%20TOR.pdf

26   The policy has been informed by other regulations and laws including: Australian and New Zealand Standard Guidelines for complaint management in organizations AS/NZS 10002:2014; 'Handling Privacy Complaints' Office of the Australian Information Commissioner (October 2016); NSW Ombudsman Complaint Handing Model Policy 2015; 'Building better relationships through complaints' The Society for Consumer Affairs Professionals Australia (SOCAP) and The Australian Centre for Justice Innovation (ACJ), Monash University

27   Model Policy, Model Procedure and Fact Sheet, 2018 http://www.nfplaw.org.au/sites/default/files/media/Complaint_Handling_By_Charities_and_Not-for-profits.pdf

28   Australia Council for International Development, Community Council of Australia, Governance Institute of Australia Fundraising Institute Australia, Justice Connect, National Roundtable of Non-profit Organisations, Our Community, Philanthropy Australia, Public Fundraising Regulatory Authority and Volunteering Australia

29   https://www.dutyof.care

30   NGOs and government jointly commit to improving safeguarding standards: https://www.bond.org.uk/news/2018/03/ngos-and-government-jointly-commit-to-improving-safeguarding-standards

31   For more on approaches to recruitment and vetting see Safeguarding Guidance: Employment References http://dutyofcareinternational.co.uk/wp-content/uploads/2018/04/Safeguarding-guidance-employment-references.pdf

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