

The UK's approach to safeguarding in the humanitarian sector

Literature review

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1. Introduction

Overview

In recent years, sexual exploitation and abuse (SEA) within the humanitarian aid sector has become a matter of acute concern to policymakers and the public. In 2001-02, allegations of a sex-for-aid scandal in West Africa led to calls for change and the first global policies on addressing SEA. Heightened attention was drawn to the issue in 2018 when allegations were reported about SEA perpetrated by Oxfam staff in Haiti dating back to 2010. Subsequent investigations revealed these were not isolated incidents but appeared to be systemic across the aid sector. In the past three years, the issue has taken on far greater prominence, bolstered by the global #MeToo movement which manifested itself as #AidToo within the wider development sector (Riley, 2020).

The Inter-Agency Standing Committee (IASC)¹ and UNICEF (2019, p. 2) refer to SEA in humanitarian settings as a protection failure and violation of universally recognised international legal standards of which the UK is party. Most notably, these include principles enshrined in international human rights law and relevant provisions of international humanitarian law: Fourth Convention and Additional Protocol I; Article 6 of the UN Convention on the Elimination of all forms of Discrimination Against Women (1979); Article 34 of the UN Convention on the Rights of the Child (1989); and Article 26 of the International Covenant on Civil and Political Rights (1966).

In addition to obligations under international law, SEA also undermines the UK's broader international commitments. These include Sustainable Development Goal 5 pertaining to gender equality and empowerment for women and girls, requirements under the International Development Gender Equality Act (2014) to meaningfully consider the impact of all development assistance from a 'do no harm' and gender equality perspective, and Strategic Outcome 4 of the UK National Action Plan on Women, Peace and Security, which recognises that women and girls face heightened risk of abuse in humanitarian contexts and require more tailored attention.

The UK government had not historically prioritised this issue (Naik, 2018a; IDC, 2018), despite playing a leading role in raising awareness on sexual violence in conflict and gender-based violence in humanitarian contexts (Kirby, 2015). Driven in part by the revelations of 2018, it has since made strong commitments to reform practices in the humanitarian sector. Under the leadership of the Department for International Development (DFID) – now the Foreign, Commonwealth and Development Office (FCDO), it launched a range of initiatives to ensure that implementing partners of UK aid put in place measures against SEA. It hosted two Safeguarding Summits in 2018 to encourage the adoption of similar measures across the sector. FCDO also worked with other aid-spending departments to develop a cross-government Safeguarding Strategy, launched in September 2020, and a Safeguarding Resource and Support Hub which has carried out a Global Evidence Review on existing evidence and gaps on SEA in the aid sector.

Purpose of the literature review

Despite being a high priority and receiving increased resources since 2018, significant knowledge gaps remain regarding effective approaches to protection from SEA (PSEA) and response to SEA in aid settings. A range of factors – including the stigma attached to sexual violence and the difficulties of conducting research in humanitarian and conflict-affected settings – means that reliable evidence is scarce. The literature review has therefore focused on highlighting promising avenues of what could be considered 'better practice' in prevention and accountability, indicating approaches that have been considered less effective and highlighting gaps for future research.

The literature review highlights what the existing literature on PSEA can contribute to the following questions for ICAI's review of The UK's approach to safeguarding in the humanitarian aid sector:

- How relevant and appropriate is the UK government's approach to PSEA?

¹ Established in 1992, the Inter-Agency Standing Committee is a forum of UN and non-UN humanitarian partners aiming to strengthen the delivery of humanitarian assistance to affected populations.

- How well does the UK government’s approach reflect the needs and priorities of affected communities in humanitarian contexts and of victims and survivors?
- Is the UK’s approach consistent with the efforts of other humanitarian funders and agencies?

Scope of the literature review

The following issues are not in scope for the literature review: sexual harassment (for example, workplace harassment against international aid workers), broader child protection issues and SEA in international peacekeeping contexts (which was covered in ICAI’s literature review of Conflict-related sexual violence and sexual exploitation and abuse, 2020), although there may be some overlaps as the responses to these issues influence each other. The literature review primarily focuses on humanitarian contexts (including emergency, disaster and conflict/post-conflict contexts), although it draws on literature from wider development contexts where relevant.

Approach to evidence

The literature review has consulted 200 published documents, covering English-language investigative and media reports and commentary from reputable sources, documents, policies and guidelines produced by donor governments and multilaterals, analyses from non-governmental organisations (NGOs) and research studies since 2002. Relevant literature from wider gender-based violence, justice and accountability to affected populations fields has also been consulted.

The methodology involved searches on the websites of international organisations and research institutes as well as social science databases and Google Scholar to identify further relevant literature. Search terms were derived from the core research questions and inclusion criteria were based on the extent to which publications provided useful and credible information against these.

The main limitation of the review is the uneven and unreliable quality of available evidence, making it challenging to determine macro-level trends. This is due to a range of factors, including the challenges of collecting data on SEA in conflict-affected settings and those in which a humanitarian response is in progress. The body of peer-reviewed literature and academic studies is therefore limited, and there is a disproportionate concentration of authors from the Global North, which is reflective of broader power dynamics explored in Section 3. The literature primarily focuses on the aid sector’s shortcomings in addressing the root causes and drivers of SEA. Due to the focus on general trends and challenges, combined with space constraints, the review is not able to contextualise these in light of the particular – and very varied – insecure contexts in which individual humanitarian operations take place.

Report structure

Section 2 provides an overview of definitional issues associated with SEA, and outlines available evidence on incidents, scale, prevalence, trends and vulnerable groups. Section 3 outlines what is known about the causes of SEA, including immediate and more structural drivers across different contexts. Section 4 outlines the evolution of international attention and response to safeguarding and delves into emerging evidence on ‘what works’ in prevention and response.

2. Overview of SEA in the humanitarian sector

Sexual exploitation and abuse committed by aid personnel in humanitarian settings is known to occur against aid service-users and affected populations (UN Secretary General, 2003). When humanitarian responses scale up, surges in new responders (including those not previously from humanitarian backgrounds), scarce resources and power disparities between aid actors and local populations increase vulnerabilities and negative coping strategies which can drive SEA (IASC, 2020). The International Development Committee’s (IDC) 2021 inquiry into progress in

tackling the SEA of aid service-users found that SEA is still rife in the humanitarian aid sector, with the IDC Chair calling it the “last safe haven” for perpetrators (UK Parliament, 2021).²

While reports of sexual violence during war have permeated the media for many years, incidents of abuse involving humanitarian staff mandated to safeguard local populations in times of crisis have received heightened attention in recent years. The literature emphasises a ‘moral outrage’ at the ‘perversion’ of an international system set up to protect and assist individuals affected by humanitarian crises, noting the hypocrisy of some agencies promoting gender equality and human rights “degrading and violating these same standards within their own operations” (Kolbe, 2015; see also Heyzer, 2004; Kent, 2007). Much of the literature explores the power dynamics inherent in post-colonial humanitarian aid contexts, whereby aid workers are considered “good people, above reprimand” and recipients of aid are viewed as “people who ought to be grateful” (Dixon, 2021, para. 2; see also Hilhorst, 2017). Where relevant, the literature review also seeks to contextualise some of the key challenges associated with SEA by humanitarian organisations which are delivering life-saving work in insecure contexts.

2.1 Typologies of SEA and definitional issues

Sexual exploitation and abuse

In 2003, the UN first defined SEA within the Secretary General’s landmark Bulletin ‘Special Measures for Protection from Sexual Exploitation and Abuse’ as “any actual or attempted abuse of position of vulnerability, differential power or trust for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another” (UN Secretary General, 2003, p. 1). The Bulletin prescribes a ‘zero-tolerance approach’ that considers acts of SEA as grounds for disciplinary measures (including dismissal). It classifies the use of sex workers as SEA, as well as sexual activity with anyone under the age of 18, regardless of legal status in an operating country, and does not accept mistaken belief in the age of a child as a justification for SEA. This has since become a cornerstone of SEA policy in the humanitarian field (Westendorf, 2017), with many other aid organisations subsequently applying the same or similar definitions.³

Safeguarding as a ‘buzzword’ and evolution of UK understanding

The UK government adopted the term ‘safeguarding’ in its early response to the SEA scandals of 2018. This was driven by use of the term in UK approaches to social care and the protection of children and vulnerable/‘at risk’ people, rather than specifically for the phenomenon in humanitarian aid settings. Analysis of references in DFID’s 2018 programming guidance showed that ‘safeguarding’ referred to “taking all possible steps to prevent harm, exploitation and abuse from occurring – and to protect people, especially vulnerable adults and children) from that harm” (DFID, 2018, p. 4), but failed to identify SEA as a specific risk. Harm caused by the misconduct of personnel engaging in SEA was also not included in the list of examples of the unintended negative effects of programming in DFID’s Safeguarding Policy (2018).

Sandvik (2019, p. 1) notes that the term has since acquired a more specific association with “all actions by aid actors to protect staff from harm (abuse, sexual harassment and violence) and to ensure staff do not harm beneficiaries”. The term became further focused on the issue of SEA following the media coverage of high-profile sexual exploitation scandals and started to be institutionalised by the UK government and large UK NGOs as a concept through various Safeguarding Summits (Sandvik, 2019). The literature indicates that at this stage the term became a ‘buzzword’⁴ used almost exclusively in the UK or, at most, “a buzzword largely confined to certain humanitarian policy arenas in the Global North” (Sandvik, 2019, p. 2; see also Daoust and Dyvik, 2020; Orr et al., 2019), with most humanitarian actors referring to the concept as ‘sexual exploitation and abuse and sexual harassment’ (SEAH). DFID (2019, p. 8) itself acknowledged that the term ‘safeguarding’ is not easily translatable to the Global South, often requiring sensitisation within cultural and legal contexts that do not even define SEA as a

² 73% of individuals responding to the IDC’s 2020 survey believed that the SEA of aid beneficiaries is still a problem (2021, p. 5).

³ For example, in 2018 the International Federation of Red Cross and Red Crescent Societies (IFRC) defined sexual exploitation as: “any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes with respect to Affected Persons, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. Any payment (through cash or any other commodity or favour) for sexual services is considered to constitute sexual exploitation” (2018, p. 3).

⁴ See Cornwall (2007) for an explanation of what is meant by ‘buzzword’ in the broader development sector.

crime. The term's lack of relevance to victims and survivors is further explored in Section 4, including the importance of designing safeguarding interventions more closely with local partners and communities.

The UK Strategy on Safeguarding Against SEAH within the Aid Sector, signed by FCDO and all other UK official development assistance (ODA) spending departments, eventually clarified that the term 'safeguarding' is used to mean "safeguarding against SEA and sexual harassment" (FCDO, 2020, p. 4). By 'sexual harassment', the UK included sexual misconduct in the workplace and incidents involving staff and volunteers rather than solely focusing on service-users and affected populations. It therefore became more closely aligned with the UN's definition, which – at least at a presentation level – has moved towards using the term SEAH.⁵ There is a lack of consensus in the literature as to whether workplace sexual harassment should be considered part of SEA. The boundaries between workplace and aid service-user abuses are not always clear-cut, particularly when considering aid workers recruited from the community (for instance, incentive workers⁶ or local community members who are abused while applying for jobs in humanitarian response efforts). There are different lines of accountability and response for personnel with contracts who can avail themselves of employment and other rights to which aid service-users, or community members applying for aid jobs or working as incentive workers or volunteers, do not have recourse (Kolbe, 2015). Sexual harassment against contracted aid workers in regular employment is not in the scope of this literature review, while harassment pertaining to local community members and/or aid service-users employed by aid agencies in a less regulated manner or seeking employment remains in scope.

Definitional consensus and controversies

There are several debates in the literature around the wider terminology used in relation to SEA. These have important implications for prevention and accountability efforts, including a need to focus on rights-based, as opposed to needs-based, programming, to tailor approaches to the full, diverse spectrum of SEA, and to recognise the role of agency and consent in SEA incidents.

While the UN definition of SEA and its zero-tolerance approach has gained prominence since 2003, it too has faced several criticisms. Otto (2007) argues against the breadth of the definitions of 'sexual exploitation' and 'sexual abuse', which imply that both consensual and forced interactions are covered under the same umbrella term 'SEA'.⁷ Westendorf and Searle (2017) recognise that while the use of 'SEA' is helpful in distinguishing such behaviour from other forms of misconduct, it also risks obscuring significant differences in the form and causes of the behaviour it encompasses. Otto (2007, p. 14) further disputes the UN Bulletin's 'stereotypical' representations of women and girls as sexually vulnerable groups requiring protection, while locating sexual power with men only, arguing that such understanding reinforces the presumption of hetero-normativity and cultural silencing of same-sex activity. She further criticises the UN's automatic consideration of the relationships between aid staff and local people as suspect and inherently unequal, believing this "completely denies women's agency in matters of sexuality" (p. 12).

Westendorf (2016, p. 9) expands on this, noting two dominant narratives surrounding adult sexual relationships between humanitarian personnel and local populations. The first, adopted by the UN Bulletin, frames these through a lens of differential power, vulnerability and inferred exploitation, while the second frames them through a human rights lens, emphasising women's agency and arguing that humanitarian personnel have "no business intervening in the sex lives of either employees or local populations". The default assumption here is that these relationships should not be assumed to be exploitative unless explicitly shown to be. This interpretation is an important one, with Westendorf finding that senior staff at HQ levels tend to favour non-fraternisation policies prohibiting consensual relationships for all mission personnel to minimise the likelihood of SEA, while staff in the field acknowledged the inevitable challenges of regulating relationships between personnel and local populations, calling for a more nuanced response.

⁵ Some UN policy documents and frameworks still treat SEA and sexual harassment as separate issues.

⁶ Incentive workers are people recruited in humanitarian aid settings to undertake jobs in connection with the provision of assistance and services.

⁷ Please note that while the author's views are originally focused on peacekeeping-related SEA, they can apply to the humanitarian context more broadly.

Further debates exist around the use of the terms ‘survivor’ and ‘victim’ to characterise a person who has experienced SEA by humanitarian personnel. The literature indicates that not all of those considered victims or survivors of SEA within the UN’s zero-tolerance approach and blanket prohibition on transactional sex would identify as such. As stressed by Grady (2016, p. 954), transactional sex is a wide spectrum that goes from cases of ‘survival prostitution’ involving those who sell sex for food and shelter, to adults looking for a ‘sugar daddy’ (referred to as a ‘mutually beneficial’ relationship) to improve their standard of living. Similarly, Sandvik (2019, p. 3) notes that the interpretation of SEA is “shaped by changing cultural perceptions of transactional sex and prostitution, primarily in the Global North”. Spencer (2018, p. 7) further argues that the use of the word ‘survivor’ supports the conceptualisation of the “third world woman”⁸ as an oppressed subject, isolating SEA from the broader continuum of gender subordination.

An earlier ICAI literature review, accompanying the review of the UK’s Preventing Sexual Violence in Conflict Initiative (2021), considers that the term ‘victim’ of conflict-related sexual violence:

“deprives survivors of their agency, diminishes their resilience, and risks ‘re-victimising’ them. To label survivors as ‘victims’ implies that their primary identity is a body, on which violence has been perpetrated. Such labelling denies them the possibility of regaining control”. (ICAI, 2020, p. 2)

While the term ‘survivor’ has a more empowering connotation, ‘victim’ is used across the UN (including by the Office of the Victims’ Rights Advocate) and is considered critical by the UN in recognising the violation perpetrated through an act of SEA and a person’s right to justice and accountability (UNHCR, 2020). The relationship, and relative trade-offs, between survivor-informed approaches and justice and accountability are further explored in the literature review. In this literature review, those individuals who have experienced SEA by humanitarian aid workers are henceforth referred to as victims and survivors, in line with FCDO’s terminology following the 2018 SEA crisis, and in recognition of individuals’ right to self-define their own experience.

Conflation of SEA and other forms of sexual and gender-based violence

SEA perpetrated by humanitarian aid workers is a specific form of gender-based violence (GBV) that exists on a broader continuum in contexts of state collapse, weak law and order, emergency and fragile contexts, violent conflict and high displacement. This continuum includes conflict-related sexual violence (CRSV), sexual and gender-based violence (SGBV) – including violence against women, men, children and sexual and gender minorities, intimate partner violence, child, early and forced marriage and forms of human trafficking. Conflation of SEA with other forms of SGBV can result in the under-reporting of acts specially perpetrated by aid personnel (demonstrated in Section 2.2).⁹

The key factor distinguishing SEA in humanitarian aid settings from other forms of SGBV is that of the perpetrator belonging to an aid organisation and therefore having a duty of care towards aid service-users. As such, SEA is generally dealt with through separate, distinct procedures, policies and funding streams by the UN and other donors, including the UK. Nevertheless, there are examples of SEA in humanitarian aid settings that could also fall under the definition of other forms of SGBV, including marriage between humanitarian personnel and underage girls or the trafficking of vulnerable groups for sexual purposes by humanitarian personnel. Spencer (2018) highlights that SEA is also commonly misunderstood within the humanitarian system itself, often being conflated with CRSV or broader GBV against local populations, which she argues has promoted the ‘convenient’ narrative of perpetrators being associated with local, non-western males and a ‘subversion’ of the phenomenon:

“[There was the] self-evident hypocrisy of men implementing humanitarian programming abusing their female counterparts and women and girls in the community, whilst the organisations they belonged to attempted to prevent men in crisis affected communities from committing violence against women and girls.” (Spencer, 2018, p. 25)

⁸ A concept first used by Mohanty (1998, p. 61).

⁹ The sexual violence continuum on which SEA exists is further discussed in ICAI, *Conflict-related sexual violence and sexual exploitation and abuse: Literature review*, September 2020, [link](#). This literature review accompanied ICAI’s two linked reviews of *The UK’s Preventing Sexual Violence in Conflict Initiative*, January 2020, [link](#), and *Sexual exploitation and abuse by international peacekeepers*, September 2020, [link](#).

In summary, definitions of SEA have developed organically across different parts of the humanitarian aid sector since 2002, historically lacking precision and being open to different interpretations. Although different organisations working on these issues concurrently and independently make it difficult to identify standard terminology, the long-standing terminology developed in the UN system generally has the strongest buy-in from the international non-governmental organisation (INGO) community and is predominantly used in the literature as well as in the majority of UK and international humanitarian policy documents. In policies and programming, the concept is commonly referred to as the prevention of, or (more recently) protection from, SEA (PSEA), which, along with SEA, will be used in the remainder of this literature review.

2.2 Available data on incidents, prevalence, scale and trends

No systematic data on the prevalence of SEA exists across the humanitarian aid sector beyond country-specific incidents (for instance, in relation to specific humanitarian responses). The quality of reporting across governments, multilateral agencies, international and local NGOs also varies greatly, making it challenging to compare or to identify any macro-level trends or patterns. There are also different perceptions about how much data should be publicly available. Advocates for victims and survivors argue that publishing data on SEA incidences is critical to transparency and breaking the culture of silence (IDC, 2019, p. 20). Some aid organisations express hesitancy, fearing potential media, donor or public backlash from reporting cases despite there being a lack of consensus regarding the extent to which the 2018 scandals impacted the sector as a whole and specific agencies such as Oxfam (Hillier, 2018; Cooney, 2018; Power, 2020).

This sub-section summarises the most credible reports of systemic, chronological abuses involving multiple agencies, although all incidence data cited is acknowledged to be uncertain.

Data limitations

There is wide consensus that data on SEA in humanitarian aid settings, as in other sectors,¹⁰ is unreliable. Nordas and Rustad (2013) highlight the scarcity of independent analyses of SEA incident rates and the “enormous” margin of error on SEA data which has often not been investigated or substantiated. The Overseas Development Institute (in IDC, 2018, p. 32) further highlights that chronic under-reporting has made “data collection on the scale and type of SEA difficult, analysis of the problem inaccurate and remedial measures ill-targeted”. Hilhorst (2017) argues that part of the challenge in quantifying rates of SEA perpetrated by aid workers is its sensitive and largely invisible nature, indicating that efforts to establish incidence data may instead be better directed towards understanding particularly vulnerable groups, perpetrators and drivers in humanitarian contexts.

Grady (2016, p. 953) notes that part of the challenge occurs due to the fact that “the ‘zero tolerance’ policy applies as if one size fits all, regardless of different local laws, histories, cultures and gender politics”. Therefore, if local victims and survivors or witnesses of SEA do not understand the remit of the policy or where they fall within it, or indeed that they can report cases to the UN, it is unsurprising that statistics on allegations will suffer. Grady further notes that empirical studies on SEA “have been rare – not least because of the complexity of trying to collect data from potentially vulnerable victims in hostile environments” (2016, p. 947). Toale (2021, p. 2) adds that different tracking, reporting and assessment systems, as well as changes to categories of SEA, mean that UN data is not compatible with data generated by qualitative studies undertaken by NGOs.

Naik (2021a) challenges this notion of under-reporting, arguing that it is actually more a case of under-acknowledgement and under-action by aid agencies until incidents are exposed by the media, which rarely happens. Indeed, major SEA scandals show that local communities are willing to speak up: the reports exposing both the 2002 West Africa scandal and the 2020 Democratic Republic of the Congo (DRC) scandal reveal that communities had tried to raise concerns and that abuses were an ‘open secret’ which could be uncovered by independent persons willing to take proactive steps to make enquiries (UNHCR and Save the Children UK, 2002a; Flummerfelt and Peyton, 2020a).

¹⁰ See ICAI, *Conflict-related sexual violence and sexual exploitation and abuse: Literature review*, September 2020, [link](#).

Published data: UK government and NGOs

According to the Charity Commission, between 2018 and 2019 there were 2,504 reports of SEA incidents, compared to 1,580 the previous year, following the safeguarding allegations against Oxfam (2019, p. 16; 2018, p. 3). The Commission's review of historic reports from 2014 to 2018 found that overseas aid and famine relief charities provided 366 reports of serious incidents during this period, representing 29% of all those received across all registered UK charities. It noted that under- and over-reporting of cases indicated a lack of common understanding of what constitutes SEA, inhibiting charities from identifying and learning "wider lessons arising from an incident" (2018, p. 11). Further, the IDC's 2018 inquiry found that the exact scale of SEA is currently impossible to define. Despite noting that aid organisations should improve reporting of SEA as a vital step in prevention and response, it expressed disappointment in its 2019 follow-up report that "some organisations still seem reluctant to publish information about the number of allegations they have received and the outcome" (IDC, 2019, p. 4). DFID (2019), too, found that most INGOs do not compile aggregate data on the number of SEA(H) incidents or reports, unlike the UN which systematically collects and publishes SEA data annually.

A study by global charity Elrha (cited in Birchall, 2020) found significant inconsistencies in data published by members of the Disasters Emergency Committee (DEC). While some reported at the UK agency level in annual reports, others reported at confederation and/or global levels, with the lack of consistency in the types of incidents reported and categorisation of these making comparisons and trend analysis difficult. Other inconsistencies included some members not distinguishing between victims and survivors who are adults versus children, or staff members versus programme participants, and some DEC members including broader child protection issues in SEA reporting. In an assessment of annual and accountability reporting by leading UK NGOs,¹¹ Birchall (2020) found that some organisations included complaints of bullying or abuse of power in their reported data, none reported publicly on the sex, disability status or ethnicity of the victim or survivor, or of the perpetrator, and no information on region or location was included. Although the majority of organisations assessed did include information on the outcomes of investigations, no information was reported on outcomes for the victims and survivors or timescales, drawing to attention wider challenges around survivor-centred approaches which are explored in Section 4.

There have been a few notable attempts to estimate the scale of SEA by humanitarian aid workers, including studies in Liberia (Berber et al., 2017), Haiti (Synder, 2017) and a global study by the NGO Hear Their Cries (2017). Collectively, these found that the number of SEA reports against UN personnel were consistently higher than those recorded by the UN during the same time periods. However, the studies largely relied on estimates of historical under-reporting in humanitarian settings. In terms of larger INGOs, Oxfam, like some other organisations, refuses to release country-specific data on SEA allegations to avoid compromising people's identities, which further obscures the extent of the issue (Flummerfelt and Peyton, 2020b). This reflects a broader tension between transparency and protecting the identity of victims and survivors, which arguably would be of less concern if reporting reflected the full scale of SEA. As noted by the IDC (2021, p. 15) "understanding the scale of the problem is crucial for assessing whether measures taken are working, otherwise we are reliant on anecdotal evidence and scandals breaking in the media".

Published data: UN

The vast majority of studies on SEA prevalence within the UN have focused on international peacekeeping contexts, mostly neglecting analysis of the humanitarian aid sector (Karim and Beardsley, 2015; Nordas and Rustad, 2013). Spencer (2018) refers to this as an "academic bias" that frames the issue as a form of militarised masculinity. Nevertheless, the Secretary General has recognised that SEA spans across the UN rather than being confined to peacekeeping:

¹¹ Data was taken from Action Against Hunger (2019), Action Aid (2019), British Red Cross (2017), CAFOD (2019), CARE International (2019), Help Age International (2019), Islamic Relief Worldwide (2019), Oxfam GB (2019), Plan International (2018), Save the Children (2019), Tearfund (2018), *Trócaire* (2019), VSO (2019), WaterAid UK (2019) and World Vision (2019).

“Contrary to the information spreading that this is a question related to peacekeeping operations, it is necessary to say that the majority of the cases of SEA are done by the civilian organisations of the UN, and not in peacekeeping operations.” (UN Secretary General, 2017a, para. 7)

Indeed, UN data since 2017 shows that allegations against UN non-peacekeeping staff are consistently higher than those against the military and police contingents of peacekeeping missions – although it is important to recognise that this is also affected by different complaints mechanisms used across contingents.¹² In 2019, over 325 cases against UN implementing partners, staff and related personnel were reported, compared with just over 75 reports against civilian, military and police peacekeepers.

Westendorf and Searle (2017, p. 372) question the validity of UN data, however, noting that UN policies do not distinguish between adults and children engaging in transactional sex, despite these differing significantly in nature and legality. Grady (2016, p. 52) argues that, since UN SEA data cannot realistically be subjected to an external audit, it has been able to project “false confidence” in its published reports and cannot be held accountable for this. Indeed, a panel appointed by the UN Secretary General to study SEA in peacekeeping settings¹³ determined that the “UN does not know how serious the problem of SEA is because the official numbers mask what appears to be significant amounts of under-reporting” (Awori et al., 2013, p. 14). ICAI (2020, p. 24) similarly found that it is problematic to ground analysis and draw inferences based on the UN’s empirical data, particularly before 2016.

Scale: SEA against humanitarian aid service-users

In 2002, a landmark report documented 67 allegations of SEA against refugee children by aid workers from 40 UN agencies and NGOs in refugee camps across Liberia, Guinea and Sierra Leone (Naik, 2002, p. 17; UNHCR and Save the Children UK, 2002a, p. 46). The report uncovered abuses involving children being mostly exploited by locally recruited aid workers, often in exchange for aid supplies such as biscuits, soap and plastic sheeting. A follow-up investigation by the UN Office of Internal Oversight (UN OIOS) later that year uncovered 43 additional allegations of SEA, out of which ten were substantiated with evidence sufficient to constitute criminal or administrative misconduct (UN Secretary General, 2002). The IASC Task Force on Protection from SEA in Humanitarian Crises highlighted that the problem was not confined to West Africa but was a global problem in which “no country, society or community is spared” (IASC, 2002, p. 1).

A Save the Children UK report (Csáky, 2008, p. 10) later found that the scale of SEA in South Sudan, Côte d’Ivoire and Haiti was significant, but did not distinguish between humanitarian aid workers and peacekeepers. Nearly two-thirds of 341 community members interviewed recalled incidents of verbal sexual abuse.

A report by the Oxfam Independent Commission on Sexual Misconduct, Accountability and Culture Change, *Committing To Change, Protecting People – Toward a More Accountable Oxfam* (2019), found that from April 2018 to September 2020, 88 staff across the Oxfam confederation were dismissed following SEA allegations. The Charity Commission (2019, p. 4) also found that cases of Oxfam staff engaging sex workers (some of whom may have been underage) in Haiti in 2011 were not a “one-off isolated incident”, with warning signs identifiable since 2010. A study by the Thomson Reuters Foundation highlighted that this was reflective of a more systemic problem, with 120 staff from 21 leading charities¹⁴ sacked globally in 2017 over sexual misconduct (Bacchi, 2018).

In 2018, approximately 40% of 190 women and girls surveyed by the UN Population Fund (UNFPA) in Dara’a and Quneitra, Syria, reported that sexual violence took place when accessing services such as humanitarian aid (UNFPA, 2019; Landale and O’Dowd, 2018). The latest report reiterated that SEA “by humanitarian workers, local authorities and other actors involved in the distribution of humanitarian assistance also remains a reality for many women and girls and, in particular, female-headed households” (UNFPA, 2021, p. 14). These reports do not clearly distinguish whether SEA was being perpetrated by those directly employed by aid organisations or sub-contracted by partners, or by government and rebel authorities involved in the distribution of aid, which is

¹² Data from the UN Conduct and Discipline Unit’s website (2007-2020) and data sets on UN staff data regarding allegations against UN staff (2017-2020) and implementing partners (2018-2020) in Toale (2021).

¹³ Note that the research only focused on SEA by members of UN peacekeeping missions.

¹⁴ This included Save the Children, Oxfam, the Norwegian Refugee Council, CARE International and Médecins Sans Frontières.

notable given that degrees of control and power may vary, and also in terms of what donor governments can or cannot feasibly do in response.

Finally, a joint investigation into the 2018-2020 Ebola response in the DRC, including testimonies from over 50 women and evidence from aid agency drivers and local NGO workers, unveiled 30 allegations of SEA against international aid workers as well as the country's Ministry of Health. The highest number of claims related to the World Health Organisation (WHO), with other claims made against the International Organisation for Migration (IOM), UNICEF and NGOs such as World Vision, Oxfam and Médecins sans Frontières (Flummerfelt and Peyton, 2020b). A 2021 report revealed further allegations, with more than 20 women reporting SEA by aid workers in Butembo, including claims of rape by WHO workers and the death of one woman from a "botched abortion" (Flummerfelt and Kasongo, 2021). The EU collected 26 SEA allegations from funded agencies in the Ebola response, which may or may not overlap with those mentioned above (Nielsen, 2021).

2.3 Vulnerable groups

Although the sporadic nature of evidence makes it challenging to judge regional or macro-level trends in vulnerability to SEA, the literature indicates that characteristics of age, gender, poverty, disability status and sexual orientation intersect to increase a person's risk in humanitarian settings. This suggests a need to better integrate these issues into messaging on SEA, and to develop tailored strategies to ensure protection, which is further explored in Section 4.

There is a wider debate in the literature regarding the humanitarian sector's framing of SEA around concepts of 'vulnerability' and 'at risk', which are rarely interrogated despite having consequences for how protection and response is conceptualised. While the Charity Commission and most UK-based aid organisations' safeguarding policies frame vulnerability as "being generated by individual characteristics such as gender, sexuality, age, disability, illness, ethnicity, or poverty",¹⁵ Daoust and Dyvik (2021, p. 7) note that the term carries a number of assumptions which may not be universally recognised, especially regarding who is to be protected, why and against what risks. They argue against a conception that is primarily defined by a 'lack' on the part of those deemed vulnerable, and for a greater focus on the structural inequalities that contribute to harm and prevent individuals from seeking protection or justice. This tension between prevention among perpetrators and accountability towards vulnerable groups is further explored in Sections 3 and 4.

Women and girls

The literature clearly highlights that women and girls are disproportionately affected by SEA in humanitarian aid settings. In allegations against UN staff, related personnel and implementing partners between 2017 and 2020, women accounted for 80% of victims and survivors (Toale, 2021, p. 1). Those without strong support networks are particularly vulnerable. A 2020 study found that in Uganda refugee settlements, South Sudanese women and girls living alone or without adult males were particularly at risk of SEA, with their single status exacerbating existing economic vulnerabilities (Potts et al., 2020a, p. 11). The UN's 2018 assessment in Syria similarly found that widows and divorced women were vulnerable to SEA through lacking 'male protectors' and being forced into designated areas within IDP camps known as 'widow camps':

"Most of the beneficiaries after the first visit to the aid centre did not come back because of the verbal, sexual and psychological violence. Everyone wishes that safe space centres would take charge of aid distribution because some women do not have a man who can do it for them." (Female community member in Syria, quoted in UNFPA, 2019, p. 47).

Refugees and internally displaced persons

Refugees and internally displaced persons (IDPs) are particularly vulnerable to SEA. In many settings, they may have fewer rights than citizens, lack documentation required to access aid, live in poorly designed camps or informal settlements in urban areas with insecure facilities and a lack of oversight from authorities, be separated

¹⁵ See, for example, Bond's safeguarding commitments which refer specifically to "women, children and disabled people" as "vulnerable groups" (2018, p. 5).

from family members and support systems, or lack recourse through national justice mechanisms (Mazurana and Van Leuven, 2016; Bramucci et al., 2015; Davey et al., 2010). UNHCR and Save the Children's 2002 report found extensive SEA of refugees in several camps across three West African countries, with the majority of research focusing on camps and displaced people which most consistently receive humanitarian aid. A number of studies have since highlighted the vulnerability of refugees when accessing aid distribution sites in settlements, including Syrian women and girls in Lebanon and South Sudanese women and girls in Uganda (Potts et al., 2020a, p. 12; 2020b, p. 12). In-depth research commissioned by Oxfam's Independent Commission (2019, p. 12) found that coercive sex committed by members of aid organisations was "pervasive" in two research sites among refugee and host communities in Africa and Asia. Displaced Syrian women also reported feeling unsafe while male contractors visited them and while travelling to access aid in isolated areas (Potts et al., 2020a, p. 12).

Children and unaccompanied minors

Research by Toale (2021, p. 1) found that, although adults were most frequently cited as victims in allegations against civilian peacekeepers and UN staff, children were reported as most frequent victims in allegations against implementing partners in aid settings. In February 2018, UNICEF reported 282 cases of SEA committed by international peacekeeping forces and humanitarian actors in the Central African Republic (CAR) since 2014, of which 206 cases involved minors (All Survivors Project, 2018). Delaney (2006) highlights that the stage of a humanitarian emergency influences the likelihood of children being exposed to SEA, by humanitarian actors or other categories of people such as community members or those in positions of power. In the immediate aftermath of a crisis, they are at increased risk of separation from their parents, making them vulnerable to trafficking and abduction. In relief and recovery stages they are more likely to be sexually exploited as a means of survival. In longer-term reconstruction phases, and as visitors return to areas affected by humanitarian crises, children are at risk of abuse through sex tourism due to a lack of viable income alternatives. Children from minority ethnic or tribal communities are at particular risk as they are often unprotected by legal frameworks and may be targeted due to disadvantageous beliefs about them (for example, that some minority groups have historic associations with sex work and it is therefore more 'acceptable' to target them) (Delaney, 2006).

Children in refugee camps are particularly vulnerable to SEA, with those who are unaccompanied or formerly associated with armed groups at heightened risk, as well as IDP girls living in crowded camps who may have to use communal bathhouses (Norwegian Refugee Council, 2008; Save the Children, 2006). Nearly 90% of respondents interviewed across Côte d'Ivoire, Sudan and Haiti recalled incidents of children being sexually exploited by aid workers and peacekeepers, with those most at risk being those heading households of younger siblings, sleeping in separate huts from their parents or with foster parents who expected them to make financial contributions rather than attend school (Save the Children, 2009).

People living with disabilities and carers

Evidence on the specific vulnerabilities of people living with disabilities is sparse and unreliable, with survey techniques used in schools and households often missing the experiences of the most marginalised and limited evidence available on how organisations have been working to prevent and respond to SEA among this group (Allnock et al., 2015; Safeguarding Resource Support Hub, 2021). A study by Handicap International, now called Humanity and Inclusion (2015), found that people with communication difficulties, challenges with memory and hearing or sight impairments were at particular risk of SEA during crises and displacement. In Syria, UNFPA (2019) found that carers of people living with disabilities were often homebound and relying on aid deliveries, which heightened their risk of exploitation to meet their basic needs. On the other hand, women living with disabilities have also reported having to wait longer in aid distribution lines due to being considered less 'attractive' by aid workers engaging in transactional sex (Independent Commission on Sexual Misconduct, Accountability and Culture Change, 2019).

Men and boys

The literature consistently emphasises the gendered phenomenon of SEA, and despite disproportionately affecting women and girls, boys and young men are also targeted through attacks that seek to emasculate them and shame them for diverging from traditional gender norms (Ferstman, 2020; Marsh et al., 2006). Aid agency

drivers operating in the DRC during the Ebola outbreak noted that perpetrators would routinely ask for young men to be brought to restaurants and hotels (Flummerfelt and Peyton, 2020b). Refugee boys were identified by Syrian women and girls as particularly vulnerable to SEA as they were “more likely to stay silent for fear of community or family backlash” (Potts et al., 2020a, p. 11).

Chynoweth (2017, p. 64; see also Turner (2021), Zalewski et al. (2018), Dolan (2014)) argues that able-bodied, heterosexual men and older adolescent boys are generally not included in definitions of vulnerabilities, despite sometimes being targeted for SEA. She found that humanitarian actors have historically categorised men and older boys as perpetrators or allies, even if subconsciously, resulting in them being “totally forgotten” in favour of women and girls. The literature further highlights a lack of awareness among humanitarian aid workers on SEA against men. For example, national NGOs in the CAR have reportedly insisted that male perpetrators of rape against other males must be gay and taking advantage of the lawlessness created by humanitarian disasters (All Survivors Project, 2018). Aid organisations across the world have argued that there is a disproportionate focus on women and girls in SEA training materials (All Survivors Project, 2018).

“We get so stuck in our boxes about what makes people vulnerable. We don’t go in-depth with semantics and subtleties... Why can’t people see that they use sexual violence as a weapon...to emasculate men? Why don’t people see that as a vulnerability? Is it because the normal voice [in humanitarian response] is male?... Are [humanitarian staff] being manipulated because men control the dialogue?” (Protection Officer in Jordan, quoted in Chynoweth, 2017, p. 64)

People who identify as lesbian, gay, bisexual, transgender or queer (LGBTQ+)

People who identify as lesbian, gay, bisexual, transgender or queer (LGBTQ+) are particularly vulnerable to SEA in contexts where same-sex relationships are illegal or socially sanctioned with few legal or community-based protections. Studies have found that up to 70% of 60 LGBTQ+ Syrian refugees who fled the country reported doing so due to increased attacks, more than half of which were sexual – these were in part driven by the dismissive attitudes of aid workers (Chynoweth, 2017, p. 60; see also Heartland Alliance International, 2014). Chynoweth (2017, p. 53) also identified a common misconception among refugees that adult men cannot be raped by male perpetrators, commenting that “a man can defend himself, so he must have accepted it”. This raises broader issues around the effectiveness of PSEA interventions in communities where same-sex relationships are regarded as taboo, and provides an additional barrier deterring survivors from reporting cases. As with men and boys, the literature also highlights a lack of training materials for aid workers on SEA against LGBTQ+ people, despite staff reporting “masculinised and homophobic work and living environments” which are “much more pronounced in field missions” (Mazurana and Donnelly, 2017, p. 37).

3. Causality and nature of SEA in aid settings

To design effective PSEA interventions in humanitarian settings, policymakers and practitioners need to understand how SEA is perpetrated across different contexts. The literature indicates that the nature of SEA incidents is distinguishable on the basis of whether they are perpetrated opportunistically (for example, capitalising on a person’s vulnerability in a specific context, often through a negotiation or transaction) or through more calculated planning of abuse (for example, a previous perpetrator seeking employment in an NGO with the intention of committing abuse). Despite variation among these forms of SEA (including vast differences between rape and negotiated, and sometimes consensual, sex), there are also overlaps – particularly when behaviours involve both coercion and transactions.

There are a range of structural factors driving SEA, some of which present immediate opportunities for perpetrators (for example, insecure contexts lacking law and order), and others of which drive impunity and the normalisation of SEA (for example, individual and organisational attitudes, behaviours and norms that enable or condone SEA). As was the case with prevalence data, most evidence for the causal drivers of SEA is country-specific, making it challenging to identify more generalised macro-level patterns.

3.1 Forms and enablers of SEA

Economic deprivation and insecure contexts driving transactional sex

The literature demonstrates a clear pattern of SEA being used in humanitarian contexts as a transaction, whereby there is both ‘supply’ of vulnerable populations who face few alternative survival options, have little economic or social protections afforded to them and feel obligated to comply in order to receive food distribution, health services, shelter, material assistance or employment opportunities, and ‘demand’ of opportunistic perpetrators working in contexts where “the breakdown of social networks can fuel SEA” and where “moral codes from back home can seem distant and inapplicable”¹⁶ (Ferstman, 2020, p. 6). This is reinforced by reports of a “known exchange rate” for sex with children in exchange for aid supplies (Dixon, 2021, para. 3).

Within contexts of high poverty, victims and survivors often lack a sense of choice or alternative options, with informants in the DRC noting that ‘*sexe de survie*’ (sex to survive) is “sadly expected as part of accessing aid in the face of poverty” (Henze et al., 2020, p. 68). During the 2019 Ebola outbreak there, research from more than 30 focus groups showed that women were being asked for sexual favours in exchange for services such as the vaccine (Holt and Ratcliffe, 2019). In Uganda, an inquiry by the UN OIOS identified patterns of World Food Programme (WFP) staff demanding sex from local women in exchange for food in Moroto, one of the poorest regions in the country, and in a compound where more than 500,000 people faced food shortages (Okiror, 2020). A GBV expert from a Turkey Cross-Border Hub noted it is “common knowledge” in IDP camps that certain tents are for women exchanging sex, with female heads of households and divorcees often feeling “obliged to practice prostitution” (UNFPA, 2019, p. 33). The scale of transactional sex is likely to be higher than available data suggests due to victims and survivors fearing being classed as ‘spoiled’ or having their dowry reduced if they report incidents (Csáky, 2008; Schauerhammer, 2018).

Opportunistic SEA is particularly common when international response efforts have been mobilised at speed in insecure, overcrowded contexts, where civil society organisations are under-resourced, unregulated or non-existent, and where local or customary justice systems are not set up to detect and respond to SEA. Refugees in Uganda noted that aid workers demanded sex to increase food rations, prioritise women and girls in distribution lines and offer better quality items (Potts et al., 2020b). A study across 27 communities at the height of the Syria crisis found that the fear of SEA at aid distribution sites resulted in women and girls feeling too unsafe to access aid, with many facing sexual propositions by aid distributors (UNFPA, 2019).

“It [the problem] was so endemic that they [women and girls] couldn’t actually go without being stigmatised. It was assumed that if you go to these distributions, that you will have performed some kind of sexual act in return for aid.” (Landale and O’Dowd, 2018, para. 15)

“During the distribution of aid, we are abused. Some men touch the women standing in the queue. We cannot say anything.” (Adolescent girl from Ar-Raqqa, Syria, quoted in UNFPA, 2019, p. 46)

Specific living conditions heighten vulnerability to transactional sex. Those living in crowded camps and shelters, or visiting crowded aid distribution sites, are particularly vulnerable as these sites give “men proximity and access to women’s private spaces that they would not have access to otherwise” (UNFPA, 2019, p. 33). Other high-risk settings include roadblocks, camps and shelters more generally, especially those with communal bathrooms, tents without locks and broken windows, and water collection points. More historically, Save the Children’s 2006 study in Liberia found transactional sex between girls in camps and returnee communities and aid workers was widespread, with male employees distributing material goods and offering rides to entice them (Save the Children, 2006). Beyond severe economic deprivation, the study identified peer pressure from friends and parents and boredom linked to engaging in risk-taking activities as additional driving factors. Importantly, it highlighted the risk of poor humanitarian exit strategies compounding the vulnerability of local populations to SEA, noting that when WFP rations finished, communities needed to find their own means of survival to pay for facilities which had previously been funded.

¹⁶ It is important to recognise, however, that SEA also takes place in Western contexts, as inferred by Ferstman’s use of ‘home’.

Sex-for-work schemes

Sex-for-work has also manifested as a specific subset of transactional sex in humanitarian aid settings, whereby local populations are coerced into SEA to access jobs in response efforts. Oxfam's Independent Commission (2019) found that sex-for-jobs was widespread, with payment for work being withheld and male relatives losing jobs if women did not comply with demands. Subsequent investigation by journalists such as O'Neil (2019) uncovered that the allegations referred to camps in Ethiopia and Zambia involving a range of agencies, including Oxfam itself.

Aid workers in the DRC noted that the country's large Ebola operation brought thousands of jobs to be filled by local people in the country's poverty-stricken regions. With men holding most of the decision-making roles, this opened a path for "exploitation of women eager for jobs paying well above standard" (Flummerfelt and Peyton, 2020a, para. 6). More than 50 women reported being sexually abused or lured into sex-for-work schemes between 2018 and 2020 by WHO staff, among others (Dodds, 2021a). Ferstman (2020, p. 6) notes that challenging financial circumstances can lead to some victims and survivors being led "willingly" towards exploitation in "seemingly consensual relationships with a view to improving status or position", although it is important to qualify that measuring and determining consent is complicated and indeed problematic.

"We know cases of sexual exploitation. We had known a case of a nurse from a health centre supported by an agency that abused women: it traded care for sex... Around here women are almost consenting due to poverty." (SGBV Survivor NGO quoted in Henze et al., 2020, p. 32)

In Beni, DRC, women reported being approached by aid workers outside supermarkets and in job recruitment centres, with those who looked visibly disappointed after unsuccessful job applications being most vulnerable. The practice of men demanding sex subsequently became seen as the only "passport to employment" during the Ebola crisis (Flummerfelt and Peyton, 2020b).

"In this response, they hired you with their eyeballs. They'd look you up and down before they'd make you an offer." (SEA survivor quoted in Flummerfelt and Peyton, 2020b, para. 63)

"You must always have sexual relations with agents working on the Ebola response, even if you have a diploma." (Key informant quoted in Kapur, 2020, p. 22)

Career advancement was also used as a bargaining chip to negotiate SEA, with a female cleaner in Beni reporting being invited to the house of a WHO doctor to discuss a promotion. Upon arrival, he told her: "There's a condition. We need to have sex right now" (Flummerfelt and Peyton, 2020b, para. 39). Encounters typically took place at hotels serving as hubs for aid workers:

"It was so common... It wasn't just me; I'd say that the majority of us chauffeurs drove men or their victims to and from hotels for sexual arrangements like this. It was so regular, it was like buying food at the supermarket." (Local driver quoted in Flummerfelt and Peyton, 2020b, para. 31)

There is some evidence to suggest that the fear of SEA within humanitarian hiring processes can end up depriving women of income opportunities in certain contexts, sustaining part of a wider poverty cycle that drives aid responses in the first place. Kapur (2020, p. 22) notes that unclear recruitment policies during the DRC Ebola response, including a lack of formal contracts and men subjecting women to abuse as a prerequisite to employment or salary, resulted in some women and girls "abandoning their posts or avoid[ing] seeking such roles altogether, denying them the possibility of supplementing their income".

Sex/orphanage tourism

Sex tourism is another subset of transactional sex in humanitarian aid settings, whereby adults demand payment from offenders in exchange for sex with children in their care.¹⁷ Although lesser in scale than SEA, it is often an example of more calculated, rather than opportunistic, planning by offenders with a clear and consistent

¹⁷ It should be emphasised that the transaction in this case is an illegal one involving SEA against children. It takes place between the adult offender and the adult who controls access to children in their care.

preference for sexual abuse of children. ECPAT (2016) has reported cases of North American and European travelling child sex offenders (TCSOs) engaging in 'orphanage tourism' as post-disaster and post-conflict humanitarian contexts open for volunteers in the hope of boosting economic development. In countries such as Cambodia, Pakistan, Haiti, Kenya and Honduras, residential care managers have been approached directly about children's availability for sex. In the Netherlands, 15% of reports of SEA against children in travel and tourism involved a relationship established through aid work (ECPAT, 2016).

TCSOs in humanitarian contexts are able to take advantage of weak regulations, selection criteria and vetting in volunteering with overseas aid agencies, as well as space to spend time alone with children or take them out of facilities (Csáky, 2008). A study in Cambodia, Thailand and Myanmar found that the sexual exploitation and coercion of children by volunteers was driven by poorly funded and administered education systems and poverty (Ladegaard and Zeuthen Jeppesen, 2009). A German study showed that even in cases where background checks and preliminary interviews were required, fewer than half (44%) of projects examined required volunteer-tourists to provide a police clearance (in ECPAT, 2016). This points to wider challenges in vetting further explored in Section 4.

Controversies surrounding transactional sex

There are debates in the literature regarding the extent to which transactional sex between adults should be considered a form of SEA. This has several implications for policy and programming, including how to define and interpret informed consent, the dangers of sanctioning freedom and relationships between aid workers and local staff or populations, and the need to ensure SEA responses do not punish or further marginalise those choosing to engage in sex work with humanitarian actors.

Several authors criticise the UN's ban of sex workers and relationships with service-users as part of its zero-tolerance policy, which has been widely adopted in the humanitarian field (Hilhorst, 2017; Mwapu et al., 2016). Both Hilhorst (2017) and Westendorf (2017) argue that not all forms of transactional sex are survival-based, and that it exists as part of a broader set of relations. Otto (2007) argues that while transactional sex arises from incredibly difficult circumstances which reduce the element of free will, it nevertheless involves a degree of agency and negotiation that distinguishes it from rape, forced prostitution and sexual slavery. She notes that the UN approach:

“ignores the crucial difference between voluntariness and coercion, which should mark the boundary between sexual conduct that is criminal, and that which lies in the realm of sexual freedom, which should be protected by privacy and sexuality rights” (Otto, 2007, pp. 13-14).

Sandvik (2019, p. 4) also questions the “usefulness (and appropriateness) of maintaining a conceptual distinction between procuring sexual services from a beneficiary or vulnerable person – and buying them from sex workers not positioned as recipients or as being in a position of vulnerability in the humanitarian field”. In light of this debate, some organisations such as the Global Fund have started to adopt different terminology¹⁸ to define transactional sex and avoid undermining the rights of vulnerable key populations such as sex workers (DFID, 2019, p. 28).

Westendorf (2016) notes perceptions among mission staff and local community members that the main problem associated with transactional sex is not the act itself, but the stigma suffered by local people when consensual relationships end and international staff go home. In Bosnia and Herzegovina, local community members suggested that, while such relationships may have had exploitative elements, they offered important resources and opportunities for women to survive during the war, and if women consented to them, “who are we to judge?” (Westendorf, 2016, p. 9).

Beyond transactional sex, the indistinct line between consent and rape is highlighted by reports of perpetrators employing sophisticated grooming processes which render victims and survivors powerless to recognise the exploitative nature of the relationship and provide informed consent (Ferstman, 2020).

¹⁸ “Bullying, harassment, sexual harassment and abuse of power”.

SEA policies have long recognised that sexual relations based on unequal power relations raise questions of consent even if they do not involve transactional sex. As such the UN Secretary General’s Bulletin strongly discouraged sexual relationships “between UN staff and beneficiaries of assistance, since they are based on inherently unequal power dynamics and undermine the credibility and integrity of the work of the UN” (UN Secretary General, 2003, p. 2). Nevertheless, despite presenting a framework to regulate any form of SEA irrespective of cultural, historical or operational contexts, the UN Secretary General’s Bulletin notably does not prohibit such relations, partly in recognition of the difficulty of prohibiting workers from the local community from having any relations at all (UK Parliament, 2020; Mwapu et al., 2016). FCDO has since adopted stronger wording than the UN Bulletin in response to criticism by the IDC (IDC, 2021).

Burnout among aid workers presenting opportunities for SEA

Aid worker memoirs (Thomson et al., 2006) and a study by Kolbe (2015) highlight that some aid workers engage in ‘risk-taking’ activity, such as heavy consumption of drugs and alcohol, as a form of stress relief in high-pressured environments with restricted mobility. In certain contexts, this has led to the creation of an environment which is conducive to exploitation by perpetrators, with specific examples given of sexual misconduct against other international aid workers at parties or in guest houses (Kolbe, 2015). Although evidence of the connection between this and SEA against aid service-users is limited, Oxfam perpetrators in Haiti were similarly reported to engage in sex parties with local populations after “a hard day’s humanitarian work” (Pavia, 2018, para. 3).

More broadly, aid workers have highlighted that alternative outlets for stress management, self-care and safe spaces while on missions are lacking. Several studies have corroborated this, noting additionally a lack of adequate psychological and emotional care available for aid workers who have experienced SEA and the need to strengthen duty of care owed by humanitarian agencies (Kemp and Merkelbach, 2011; Schauerhammer, 2018; Mazurana and Donnelly, 2017).

Gender roles and harmful models of masculinity

The predominant perpetration of SEA by men highlights the central role that gender roles play in SEA, which Westendorf (2017, p. 375) refers to as a “necessary or desirable element of the performance of masculinity”. Mazurana and Donnelly (2017, pp. 9-10) argue that the “male domination of power, space and decision-making in aid agencies” contributes to “macho” work and living environments where sexual harassment and jokes flourish. They observe this as being particularly distinct in insecure and armed conflict contexts, driving a hyper-masculinised environment¹⁹ among aid workers that is conducive to SEA.

Flummerfelt and Peyton (2020b, para. 62) reiterate this, noting that SEA interventions within humanitarian operations are often “an afterthought and male-dominated, with few women in decision-making roles”. In 2019, the WHO reported that 81% of its Ebola responders were male, and 15 out of 18 other aid organisations surveyed by the New Humanitarian and Thomson Reuters Foundation reported teams as mostly male. Further, following an independent review of UNAIDS that identified a “patriarchal culture tolerating harassment and abuse of authority”, the agency’s second-largest donor suspended funding (UNAIDS, 2018, p.20).

“The main issue is the reporting mechanism itself, where it involves mostly men because that is who works predominately in the security offices... So, they are just simply not trained to respond effectively and with any sort of understanding and compassion. In my case, they dismissed it [SEA] as something that was not a big deal. “Boys will be boys” ... More like a brotherhood attitude as opposed to taking it seriously.”
(Female international aid worker quoted in Mazurana and Donnelly, 2017, p. 31)

Mazurana and Donnelly (2017) and Spencer (2018) draw attention to the ‘cowboy’ metaphor which is prevalent in humanitarian aid settings and highlights the harmful masculinities and neo-colonial ‘civilising’ agenda prevalent across parts of the system. Spencer (2018, p. 27) argues that three characters among expatriate aid workers play out in this metaphor and perpetuate a cycle of “masculine performances, violence, domination and oppression”.

¹⁹ Characterised by an emphasis on physical strength, aggression and sexuality.

The first, 'cowboys', enter the sector to 'rescue' people from humanitarian disasters, and, in high-intensity contexts, engage in 'debauched' activity which is compared to the wild west. They typically see no issue in exchanging aid for sex and fail to see the link between this and the abuse of women and girls addressed through their Violence Against Women and Girls (VAWG) programming. She refers to the case of a Country Director for a large child protection INGO who was married to someone who would be considered a child in the UK. She further notes cowboys' tendency to expand their 'kingdom' in humanitarian contexts in a comparable way to colonial contexts, "penetrating their frontier with masculinity as well as any women and girls they choose to along the way" (Spencer, 2018, p. 21). Secondly, 'conquering kings' are regarded as older males in positions of power, who allow cowboys to behave in this way by failing to implement sufficient SEA policies. The author posits that humanitarian aid operations are often characterised by a hedonistic lifestyle, in which cowboys and conquering kings do not wish to implicate their 'drinking buddies' in SEA investigations. Finally, the 'headquarters privileged man' refers to those who attempt to implement SEA investigations with no adequate training and a lack of awareness of gender hierarchies present in the humanitarian system. An aid worker interviewed by Spencer (2018, p. 21) notes that going on a mission provides men with an opportunity to become "bigger kings than they are already... and the organisational culture confirms them on their little throne". Other authors make similar points:

"I know of people having created particular posts to attract a particular person to apply for that post, selected them, and put them in a vulnerable position." (Aid worker quoted in Mazurana and Donnelly, 2017, p. 40).

"The management team ("four middle-aged men") were all paying for sex. They had been using Merlin cars to ferry women to and from the NGO's guest houses for paid sex." (Former Merlin Manager quoted in Parker, 2018, para. 17)

Despite being highly masculinised, there is also evidence of women's roles within the humanitarian aid system enabling or directly contributing to SEA. Spencer (2018, p. 25) found that women in positions of power are sometimes also likely to undermine SEA work:

"The head of an organisation has to be seen to be sensitive to the issues of women and girls (to the extent that this sensitivity does not lead to a change of the system). These privileged women become willing tools of the humanitarian system as a Regime of Inequality."

Mazurana and Donnelly (2017) also refer to cases of female aid workers inappropriately using their positions to pressure national male aid workers into intimate relations, with the imbalance of power making it difficult to determine how genuine consent was on the part of workers who faced the pressure of being breadwinners for their families.

Nevertheless, the literature also cautions against attributing responsibility for perpetration to gender orders and structures, which can inadvertently mask both individual and collective moral responsibility from men who make choices about their sexual behaviour and groups that act as bystanders or facilitators (Kirby, 2013). The literature also highlights that the issue of SEA within the aid sector cannot be tackled in isolation from the wider continuum of sexism, homophobia and SGBV upon which it exists. While it may be unrealistic to expect aid organisations to be "islands of exception" (Breckenridge et al., 2019, p. 18), they must ensure that work and living spaces are free from discriminatory attitudes and remain cognisant of the SGBV risks faced by national female staff to which they "are rarely responsive" yet can easily spill over into aid work environments (Mazurana and Donnelly, 2017, p. 33; see also Csáky, 2008). For example, aid agencies should have anticipated SEA during the Ebola response, and established higher protection standards for women, due to the DRC's long history of sexual violence and the impact of the crisis on community structures which enhanced gender inequalities (Holt and Ratcliffe, 2019).

Dependency and abuse of power

Literature in the psychology sector highlights that when individuals are dependent on humanitarian assistance to survive, and when humanitarian workers are given control to access the necessities of life, abuses of power are likely, thus creating the scope for SEA. Where instances of sexual abuse have affected other sectors, such as parliament (Murray, 2017) and the Church (Frawley-O'Dea 2007), the presence of a power imbalance has similarly been cited as a leading facilitator.

In camps in Liberia, Guinea and Sierra Leone, UNHCR and Save the Children (2002) found that refugees were unable to challenge the behaviour of agency staff due to their dependence upon services for their survival and the power of aid workers to withdraw these (see also Ferris, 2007).

“If I tell you the name of the NGO worker I have to have sex with, he will get fired, and then how will I feed my child?” (Mother in Guinea, quoted in UNHCR and Save the Children UK, 2002a, p. 8)

Beyond the gender-specific drivers already explored, the reasons behind this abuse of power are complex and deeply entrenched. Jamar (2016, p. 3) speculates that international aid workers’ “willingness to ‘help Africa’” and complex histories of colonialism have resulted in hierarchies of power in how expatriate aid workers operate. On the surface, these power dynamics manifest through significant differences in salaries, housing packages and travel expenses offering the most privileged more decision-making power. She argues that, even if many reject neo-colonial moralising perceptions of the humanitarian aid sector, expatriate and high-level local aid workers are operating in unequal structures that afford them the privilege to decide who will receive their support and how. Indeed, Flummerfelt and Peyton (2020a, para. 8) noted cases of WHO employees “amusing themselves by using sexual blackmail for hiring”, while Henze et al. (2020) found that aid workers selected recipients as a ‘means of seduction’.

Virtues of humanitarianism and ‘white saviour’ complex

The literature indicates that an underlying driver which has enabled SEA to continue with impunity is the so-called ‘myth’ of humanitarian innocence. O’Hara and Omer (2013, p. 5) argue that “virtuous organisations may maintain a myth of their own innocence despite actions, attitudes and values that run counter to this view of themselves”, with activities affirming the espoused identity, beliefs and values of organisations being prized and activities undermining these being fiercely resisted. Vijfeijken (2019, p. 5) adds that to maintain this virtue, INGOs can show strong defensiveness against allegations contradicting the “myth of their own innocence”. Such attitudes were also found to be evident following the 2018 Oxfam scandal, where the “belief was that that sort of thing was unlikely to happen in such a moral, professional organisation” (IDC, 2018, p. 25). IDC Chair Champion reiterates this, noting that PSEA measures often fall short because “the culture of the sector is one of colonialism, one of patronage, and [the idea] that people are really good people, doing [the job] for the right reasons” (Champion cited in Worley, 2021). O’Hara and Omer (2013, p. 181) further highlight a tendency for aid workers to “over identify” with the values of NGOs to the point where their own identities become “intertwined”. This means the stakes of being seen to “not be doing good” are even higher, thus strengthening the need to maintain a “collective sense of virtue”.

Neuman (2017, para. 1) expands on this further, arguing that these attitudes sometimes manifest in a “dominant saviour and victim” conceptualisation of western humanitarian aid agencies and recipients, focusing on the inferiority, helplessness and suffering of aid service-users at the expense of agency and rights. He argues that aid agencies have perpetuated this “hero myth” to create consensus and excuse any discretions: “After all, heroes are not fallible; they don’t make mistakes... they save” (para. 12). Naik (cited in Dixon, 2021, para. 17) similarly draws attention to the “moral assumption” that such actors are doing good and a subsequent “vested interest in not looking into [SEA cases] amongst the very type of groups that would normally be profiling human rights issues”. Vijfeijken (2019) notes that any attempt at culture change must address this myth and the powerful psychological resistance it evokes, while Garvey-Berger (2019, p. 24) argues that efforts must address the “social contract” within NGOs, where employees are seen as part of “NGO families” which contributes to a “mind trap of agreement”.

Spencer (2018) argues that this portrayal has led to an assumption among some agencies that western humanitarian aid workers are less likely than local workers to perpetrate SEA, which can risk empowering western perpetrators to commit offences in the knowledge that they are less likely to be viewed as suspects. She argues that this also gives way to ‘diversionary actions’ taken by aid agencies against non-western perpetrators, used to demonstrate active disciplinary measures where convenient while blocking investigations into cases which do not fit the construction of the non-western perpetrator. She goes as far as to argue that this has resulted in SEA being ‘othered’ as something people from the Global South engage in and isolated from the structural racial and gendered hierarchies within which it exists. Although the vast majority of humanitarian aid workers are national

staff (Knox Clarke, 2018) and most SEA perpetrators are therefore also locally recruited (Naik, 2019), the differentiation between local and expatriate staff is much more unclear in reality (Benton, 2016) and too complex to explore within this literature review.

‘Surface-level’ responses and diversionary action

Building on the concept of ‘diversionary action’, the literature indicates that some aid agencies have ‘masked over’ SEA and implemented ‘tick box’ responses without being held fully to account, enabling the problem to largely continue without consequence. Spencer (2018, p. 27) notes a pattern in aid agencies undertaking action when media attention places them in the spotlight, commissioning reports which are “shelved” and “policies which are not implemented”. In some cases, overworked staff already mandated with addressing “gender-related issues” are tasked with rolling out efforts, essentially working as “activists within their own organisation in their spare time” (p. 12), whereas in others, new posts are created. In both cases, the responsibility for addressing SEA is detached from senior leadership and the weight of implementation falls onto a single person or under-resourced department. The author argues that this results in the “hyper-compartmentalisation” of SEA, where those in both HQ and the field do not know what it is.

“It was seen as ‘gender stuff’ by colleagues – short-hand for anything which was vaguely or directly related to women and which they therefore did not wish to engage in, with few exceptions. When discussing accountability in humanitarian action, SEA did not come up.” (NGO worker discussing SEA policies, quoted in Spencer, 2018, p. 9)

The author argues that this ‘diversionary action’ is used as an intentionally weak strategy to placate anyone raising SEA concerns. She refers to a case in Jordan where the UN’s response to SEA committed by a partner NGO was to commission a study and set up a task force which had failed to implement any action a year and a half later. Nevertheless, by “stating that they will happen, the UN put in place measures which allow it to respond to questions on SEA in this context and allows for the UN to appear to be taking action” (Spencer, 2018, pp. 13-14). Hear Their Cries (cited in Schauerhammer, 2018, p. 26) similarly argues that the UN insists on investigating cases itself rather than involving local police, because internal investigations “draw on so long that the evidentiary chain goes so cold, that no prosecution could ever take place, and hence the immunity issue doesn’t come in to play”. Flummerfelt and Peyton (2020b) highlight that, out of \$700 million spent on the DRC Ebola operation, just \$40,000 of funding from the UN as of March 2020 was used to fund the PSEA Network to help agencies share information about allegations on the ground, arguably enough to signal a commitment to demonstrate that SEA is on the agenda while remaining inadequate in addressing the scale of the issue. Bruce-Raeburn (2018, para. 19) similarly argues that it “is simply not enough for aid organisations to hire a director of safeguarding” which shields them from doing the more “difficult work of dismantling the core structures of racism and sexism inherent in aid delivery systems”.

Fear of penalisation and aid management accountability

The literature highlights a tendency for SEA cases to be “seemingly brushed under the carpet for the sake of saving [the organisation’s] noble, squeaky clean image” (Grady, 2016, para. 1; see also Houldey, 2018). Ferstman (2020) highlights that the UN, for example, has refrained from accepting language such as ‘widespread’ and ‘endemic’ regarding SEA perpetrated by both peacekeepers and staff of broader humanitarian agencies, with the Security Council and General Assembly underscoring repeatedly that “the UN should not let the performance failures of a few tarnish the achievements of the whole” (UN Security Council, 2016, 2018 p. 1; UN General Assembly, 2017). This can significantly impact momentum behind prevention and response efforts, while removing the need to scrutinise structural features of SEA and accompanying policy (Grady, 2016).

A key driver of this is fear of losing credibility and funding. Hingley and Oluseso (2019) argue that organisations may be purposefully slow at quantifying or revealing SEA rates to avoid damaging their brand and income, while Nibert (2017) and Vijfeijken (2019) note cases of aid agencies overlooking SEA by employees who are relied on heavily for funding and campaigns. Anderson (2018), a former Safeguarding Coordinator at Oxfam, also argued that protection of the organisation’s brand and expansion of market penetration took priority over PSEA.

Underpinning this, there is a common assumption that organisations reporting high incidences of SEA have failed, which disincentivises them from publicly reporting and can contribute to a ‘culture of cover-ups’ (Hingley and Olusesse, 2019; Spencer, 2018). There has, however, been recognition in recent years by donors and governments that increased SEA reporting can in fact be a sign that PSEA measures and reporting mechanisms are working more effectively (Anders, 2017; Edwards, 2017e; Cornaz, 2019) and that aid organisations should be judged on what happens before and after misconduct occurs, not the fact that misconduct occurs in the first place (Sriskandarajah, 2021). Nevertheless, Naik (2021a, para. 8) has pointed to an ongoing challenge for aid agencies to resource PSEA efforts as well as the “uncomfortable contradiction” between being survivor-centred and tackling SEA versus being organisation-centred and prioritising the reputation and funding of the agency itself. Such contradictions are not easily resolved without the introduction of independent mechanisms which are better able to balance competing interests, explored further in Section 4.

The humanitarian imperative and the ‘greater good’ argument

The literature also draws attention to a moral dilemma in the humanitarian aid sector, whereby the ‘humanitarian imperative’ is sometimes perceived to override concepts of do no harm and SEA policy in favour of achieving the ‘greater good’ (in other words, delivery of humanitarian outcomes in highly complex and challenging contexts). This is evident in cases where organisations continue to implement through partners which they know perpetuate SEA or continue employing perpetrators whose dismissal may impede delivery.

An investigation into abuse of power by UNAIDS revealed that “complaints of abuse of various kinds have been brushed aside in the interest of protecting the important work of UNAIDS”, finding a contradiction between the written strategies, policies and procedures of the organisation and a workplace culture that enabled abuse and harassment (UNAIDS, 2018). Similar findings emerged from an independent review of the WFP’s work culture, which suggested that employees “collaborate to do what is necessary to provide the best possible humanitarian outcomes”, resulting in a focus on tasks at the expense of people (Willis Towers Watson, 2019). The review of Oxfam’s safeguarding practices found it had “prioritised its programme goals over how it realises its core values and the principle of ‘do no harm’ with communities, partners and staff” (Independent Commission on Sexual Misconduct, Accountability and Culture Change, 2019, p. 3).

Spencer (2018) argues it is a “masculine choice” to continue delivering aid while suspecting that it may be used as a means to exploit and abuse women and girls. She refers to the specific example of an aid organisation lacking access to a war zone continuing to work with local partners perpetrating SEA in order to reach aid service-users, despite not being able to monitor safe distribution. An aid worker interviewed notes the regional response continued because:

“without asking the women and girls who had experienced this abuse, they decided that some of them should make a sacrifice for blankets, food and hygiene materials to make their way to the community, and for the indicators in their project to be ticked off”. (Spencer, 2018, p. 18)

Aid workers have similarly claimed that humanitarian agencies turned a ‘blind eye’ to SEA cases in southern Syria, where using third parties and local officials implicated in SEA was regarded as the only way of distributing aid in dangerous areas which were inaccessible to international staff.

“The UN and the system as it currently stands have chosen for women’s bodies to be sacrificed. Somewhere there has been a decision made that it is OK for women’s bodies to continue to be used, abused, violated in order for aid to be delivered for a larger group of people.” (Landale and O’Dowd, 2018, para. 25-26)

Vijfeijken (2019) expands on how the humanitarian imperative manifests in abusive behaviour among aid workers. His research argues that humanitarian NGO leaders often view themselves as having a short time in which to respond to emergencies and as such exhibit a ‘take charge’ attitude, heightened by working in settings where their own security is at risk. He posits that these behaviours create an enabling environment for SEA and ‘saviour’ complexes which result in the ‘macho’ and ‘cowboy’ behaviours explored in earlier sub-sections.

Normalisation, resignation and corruption

Finally, the literature highlights that perceived inaction, cover-ups and intimidation deter victims and survivors, as well as whistleblowers, from reporting SEA cases, thus sending a powerful message regarding the impunity of perpetrators.

Aid officials, gender analysts and researchers examining the DRC Ebola response concluded that strategies put in place to stop abuses largely failed (Flummerfelt and Peyton, 2020a). This fuelled a culture of collective resignation, whereby victims and survivors felt that reporting cases would not make a difference: “I never considered denouncing or accusing him because everyone found this normal” (Flummerfelt and Peyton, 2020a, p. 17). Qualitative research undertaken with people living in chronic emergencies across South Sudan, Côte d’Ivoire and Haiti similarly found that the inaction of international humanitarian agencies was a key factor preventing people from reporting SEA (Csáky, 2008). Frustration is also evident among whistleblowers, who consider that such weak responses enable an ‘accepting’ culture for SEA. A whistleblower from Oxfam Iraq reported being told “what happens in Iraq, stays in Iraq” by senior management when reporting allegations, alleging the charity “turned a blind eye” to SEA perpetrated by staff who were successful fundraisers (Dodds, 2021a, para. 3). An independent review of the WFP’s workplace culture similarly uncovered a fear of retaliation among SEA whistleblowers, with consequences including taunting in front of other colleagues, a demotion in responsibilities or purposeful exclusion from meetings (Willis Towers Watson, 2019).

Bribery, intimidation and discrediting of victims and survivors and whistleblowers has also contributed to a culture of ‘cover-ups’ dating back to historical allegations against UN peacekeepers in the CAR (Picco, 2019). A study conducted by Henze et al. (2020, p. 32) found that humanitarian workers “use all the means and power available to them: money, influence and positions, to keep survivors and their families quiet”, resulting in victims and survivors feeling ‘complicit’. Similarly, an investigation uncovered instances of a WHO perpetrator being pressured into covering \$100 per month in health costs for impregnating a young woman, to “avoid sully the reputation of the organisation” (Cheng and Maliro, 2021, para. 23). In 2018, Helen Evans described the personal hardship she endured as a result of her decision to blow the whistle on safeguarding issues in Oxfam (Kay, 2019). In a more recent case, 22 current and former Oxfam staff signed a joint complaint letter stating that their concerns had been largely ignored since 2015, noting a lack of transparency about investigations (Dodds, 2021a).

“The existing systems protect perpetrators and often put survivors, witnesses and whistle-blowers in danger when they are further targeted by abusers of power... Tactics have included attacks on their competence and experience, and the invention of fabricated, extremely serious counter-accusations which are not addressed by senior management, despite repeated requests... Repercussions and dangers often much more severe for national staff.” (Dodds, 2021b).

It is equally important to recognise the highly complex and challenging contexts in which humanitarian aid organisations operate. UNHCR has argued that the suggestion that the UN is able to control situations in war zones is “disconnected from the reality of what an aid operation looks like in an open and fierce conflict” (Landale and O’Dowd, 2018, p. 39), while Oxfam has acknowledged the “uncomfortable reality” that no organisation can ever say it is free from the risk of SEA – particularly where the promise of a job or even a few dollars of assistance can create the opportunity for abuse” (Sriskandarajah, 2021, para. 6). Despite recognition that SEA is to a degree unavoidable in these contexts, Sriskandarajah (2021, para. 12) also argues that the core challenge has been the cultural and institutional failure of INGOs which have viewed SEA as the “actions of a few bad apples” rather than an inherent risk to work in humanitarian contexts, and as a result did not create an enabling environment for people to report concerns. Commentators also point out that, aside from live conflict situations, SEA has been prevalent in many post-conflict settings where agencies are able to exercise greater degrees of control over aid distribution (Independent Commission on Sexual Misconduct, Accountability and Culture Change, 2019; UNHCR and Save the Children UK, 2002a). This sub-section has demonstrated several implications for PSEA efforts which are further explored in Section 4, most notably the need to protect all who speak out and include the rights of all constituencies in designing SEA policy responses – including not only victims and survivors, but witnesses, whistleblowers, aid recipients and communities, as well as accused persons, perpetrators and aid workers (Naik in Flaherty, 2018).

4. What is known in terms of ‘what works’ in PSEA in the humanitarian sector?

This section outlines the actions of key global agencies following the 2002 sex-for-aid scandal and the UK’s specific response following allegations against UK-based aid agencies, before assessing evidence and gaps in good practice.

4.1 Evolution of international attention and response

Following the 2002 West Africa scandal

The findings of UNHCR and Save the Children UK’s West Africa sex-for-aid report (2002) highlighted SEA perpetrated by humanitarian aid personnel, helping to build momentum and set system-wide policy infrastructure which has continued to this day (Naik, 2018b, pp. 5-6). The UN IASC Task Force on Protection from SEA in Humanitarian Crisis was subsequently set up in 2002 and is still active today as the IASC Task Team on Accountability to Affected Populations and Protection from SEA. Following the 2002 report, several NGOs started taking initiatives on PSEA, including the International Council on Voluntary Agencies’ Building Safer Organisations Project, Keeping Children Safe, the Humanitarian Accountability Partnership (HAP) and its successor Core Humanitarian Standards (CHS) Alliance, which developed the Core Humanitarian Standard on Quality and Accountability. This included norms on dealing with SEA and has since been signed by more than 200 agencies, despite being criticised for lacking detail (Hilhorst, 2018).

There is general consensus in the literature that this high-level policy work did not translate into any concrete action in prevention or response. An IASC review (2010, p. 3) of PSEA policies across 14 UN agencies found that, while there was significant progress in the development of standards, there was a lack of awareness or acceptance of these among managers and staff. Additionally, it found that the policies had “not been communicated to the field with sufficient authority or clear direction”, resulting in “patchy, poor or non-existent” implementation (p. 3).

“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 Core Humanitarian Standard (CHS) and related standards are adopted and that the sector... are committed to demonstrating the application of such standards.” (Open letter from Humanitarian Quality Assurance Initiative, in CHS Alliance, 2018, p. 1)

Over the years, other initiatives emerged when agencies found themselves hit by SEA scandals. For instance, systemic reform was initiated in 2016 by the World Bank following cases of SEA in the transport sector in Uganda (Berger, 2018). In 2017, the UN Secretary General launched a new strategy to prevent and end SEA by UN personnel. This focused on four main areas of action: putting victims first, ending impunity, engaging civil society and external partners, and improving strategic communications for education and transparency. The new strategy also launched the Circle of Leadership on PSEA in UN operations, made up of global leaders²⁰ who actively “commit to end impunity, strengthen measures to prevent SEA, respond rapidly and decisively to credible reports of such acts, and meet the needs of victims quickly and appropriately” (UN, undated, para. 2), providing what DFID (2019, p. 6) referred to as the global high-level political support necessary for success. Following this, the UN appointed a Special Coordinator on Improving the UN Response to SEA and the IASC committed a series of concrete steps to address SEAH, including sharing good practices, promoting positive change in organisational culture and improving sector-wide referencing systems to stop transgressors from moving through the humanitarian system (IASC, 2018). However, it was again acknowledged that such response measures remained ineffective due to inadequate implementation (IDC, 2018; IDC, 2019, p. 8). A review of 14 UN agencies and NGOs, including country studies in the DRC, Nepal and Liberia, also found that senior management was not communicating HQ-led SEA policies to the field PSEA focal points, who lacked support and knowledge of good practice (Davey et al., 2010; Schauerhammer, 2018).

²⁰ As of 29 April 2021, 95 sitting and former heads of state/government are members of the Circle of Leadership.

Following the 2018 Haiti scandal

The 2018 Haiti scandal put UK aid in the spotlight and prompted the UK government to make strong commitments to reform humanitarian sector practices (Naik, 2019). This included hosting the international Safeguarding Summit in 2018, which brought together other donors, multilateral organisations and the private sector to encourage the adoption of PSEA measures. Following the Summit, major players in the aid sector such as Gavi and the Global Fund to Fight Aids, Tuberculosis and Malaria appointed senior-level staff as SEA/H champions, rolled out mandatory safeguarding training for all staff and strengthened due diligence process for recruitment (DFID, 2019, pp. 26-27; HMG, 2020). International financial institutions also introduced codes of ethics, whistleblowing policies and SEA complaints mechanisms, while private sector suppliers improved in-house capacity and expertise on PSEA and established a Safeguarding Leads Network which meets quarterly to monitor progress and share lessons (DFID, 2019, pp. 19-20; HMG, 2020).

Progress was also made in terms of strengthening alignment and downstream accountability. In 2019, 30 major donors who collectively provide around \$130 billion in aid each year adopted the Recommendation on Ending SEAH by the Development Assistance Committee (DAC) of the Organisation for Economic Co-operation and Development (OECD), the first international instrument to address SEAH across the aid sector (DFID, 2019, p. 6). In January 2020, an Action Plan and Communications Strategy were developed with the DAC Reference Group on Ending SEAH to support implementation of the 2019 Recommendation (HMG, 2020). Donors also committed to aligning language on SEAH for funding agreements with multilaterals (HMG, 2020), aiming to bind downstream partners to the same standards.

Generally, the literature highlights that post-2018 efforts were successful in raising awareness, helping many in the sector to take PSEA more seriously through improved standards, commitments to transparency and addressing misconduct by their own staff and partners (IDC, 2019, p. 6). Nevertheless, in 2021 the IDC argued that 'box-ticking' had failed to address the underlying structural issues (highlighted in Section 3) that have enabled SEA to persist, referring to the DRC Ebola scandal where a 'speak-up' culture did not exist (IDC, 2021). Further criticism highlighted the proliferation of policies, standards, guidance and tools produced across the sector, all with slightly different requirements, which heightened the administrative burden for organisations and lacked tailoring to vulnerable groups (IDC, 2019; Mazurana and Donnelly, 2017). The UK's funding of the Safeguarding Resource Support Hub is designed to address this, at least in part, through providing tailored guidance for aid organisations and to avoid duplication of efforts (DFID, 2020).

4.2 Challenges, lessons and good practice in PSEA

As PSEA efforts in the humanitarian aid sector only gained real prominence from 2018, there are no systematic evaluations, portfolio reviews or reliable outcome data. As in Sections 2 and 3, examples of good practice are very country-specific, generalised or speculative, limiting their transferability to wider contexts. A study funded by the UK What Works to Prevent VAWG programme (2016) highlighted that SEA in humanitarian aid contexts is not often explored, and when it is, differing definitions hamper comparability of findings. DFID (2019) similarly highlights a lack of evidence on effectiveness in reporting and ensuring accessible mechanisms.

The literature does indicate that PSEA in the humanitarian aid sector generally falls into two areas: 1) Prevention (for example, the development and better application of PSEA standards and policies, including in recruitment, vetting and human resource management); and 2) Accountability (supporting justice and reparations). Flint (2018) argues that the two cannot be mutually exclusive if the sector is to be improved. The IDC (2021) similarly noted that a full response to SEA must consider the interlinked dimensions of screening with empowerment, reporting and accountability, noting a lack of evidence on 'what works'. This section highlights some of the key challenges encountered in PSEA efforts executed as part of a relatively frantic response to high-profile SEA scandals in the aid sector, while summarising recommendations on what 'could work'.

4.3 Prevention and accountability

The need for more meaningful inclusion of local expertise

A fundamental issue emerging from the literature is the limited inclusion of Global South knowledge and expertise in PSEA efforts. Daoust and Dyvik (2021) argue that expertise and principles are almost exclusively located within UK-based institutions or international standards, and where 'local' knowledge is mentioned in the literature, it generally relates to operational procedures or helping to contextualise sets of standards developed in the Global North rather than being considered expertise in its own right. This approach of soliciting and treating local experiential knowledge in and of itself can reproduce oppression, retraumatise and result in a fatigue, whereby it becomes "the responsibility of the oppressed to teach the oppressors their mistake" (Lorde, 1995, p. 284). Bruce-Raeburn's article (2018) further illustrates this through her critique of the lack of local organisations invited to participate in DFID's Safeguarding Summit and questioning of how many standards subsequently developed included analysis from people living and working in countries where SEA occurs. DFID, too, recognised this as a key challenge:

"Many initiatives in the NGO sector to date have focused on developing quick solutions to improve safeguarding practices... or to comply with international standards or donor requirements. As a result, partner-led initiatives have not played a significant role in resolving complex in-country safeguarding issues or tailoring safeguarding practice to local contexts... Remedying this requires engagement with local partners, beyond check-lists and compliance." (DFID, 2019, para. 59)

Indeed, Agams (2018, para. 6) highlights a "growing disillusionment and disdain" for the aid sector in the Global South, and a perception that western donors "bully recipients into uncritically accepting biased, flawed and disempowering assumptions and frameworks". Such criticisms were also made by Northern-based victims and survivors, activists and whistleblowers who felt so excluded from the debate that they protested at DFID's Safeguarding Summit (McVeigh and Summers, 2018). A study by Lattu et al. (2008) found that local communities were excluded in international PSEA efforts across refugee and IDP camps in Namibia, Kenya and Myanmar, where local leaders, elders, women's support groups and committee members participated in workshops and awareness-raising efforts yet felt they had merely been 'trained' by western agencies rather than being meaningfully consulted. Communities noted that international agencies continued to promote 'externally generated' programmes, making a clear request for their role as 'first responders' and knowledge of community needs to be recognised in future interventions.

This tendency has resulted in a number of misjudged PSEA interventions which have been framed around Global North practices but have largely failed to resonate with local populations. For example, Cornaz's (2019) study of the #AidToo movement on social media, which was designed to provide a space for dialogue on SEA in the aid sector, found that despite social media offering a platform for a range of PSEA actors to engage in conversation, create solidarity and spread information at a global scale, participants were mostly PSEA specialists, NGO workers and journalists from the Global North. The study further found that the movement was mostly useful for whistleblowers from aid agencies seeking justice rather than aid service-users themselves.

"People come to us and ask information. After that, we don't see them again, or we don't hear about them for long period; How can we trust them?... We are sometimes informed, but we never participate."
(Community representative discussing PSEA in the DRC, cited in Henze et al., 2020)

Efforts to tailor and align PSEA

A contextualised approach to PSEA is particularly important in developing strategies for organisations working throughout the humanitarian aid supply chain, including, for example, development finance institutions working in construction and agriculture, where the type of SEA risks and mitigations are likely to differ. Efforts have been made to tailor PSEA interventions more and increase the inclusion of local partners, although there is a lack of evidence on the effectiveness of these and a clear need to do more. The development of the South2South (S2S) Safeguarding Training and Consultancy Network by seven NGOs across Africa, Asia and the UK is a good example of an initiative challenging the assumption that PSEA expertise is only held in the Global North. It brings together

global safeguarding practitioners and expert organisations from the Gambia, Sierra Leone, Tanzania, Kenya and Nepal to develop and deliver locally relevant and culturally sensitive training to frontline local and international NGO staff, and advise and advocate to national and local governments, donors, schools, community-based organisations and faith-based organisations (DFID, 2019). Bond has also developed tailored support and guidance for NGOs on working with downstream partners, including report-handling toolkits that have been trialled in different countries and a set of safeguarding definitions to increase understanding of commonly used terminology. However, financial barriers are still cited as a key constraint by smaller organisations, with no suitable materials tailored to their operational needs (DFID, 2019).

Strengthening gender-sensitive and inclusive SEA messaging

Another challenge emerging from the literature is a lack of tailored information on SEA in humanitarian settings and poor communication with local residents – this was particularly key to the DRC Ebola response as well as in wider peacekeeping settings as demonstrated in ICAI’s 2020 literature review. Henze et al. (2020, p. 32) note that in remote regions of the DRC, “information and understanding of what constitutes the crime of sexual exploitation is lacking, in addition to ignorance about where and how to report”. It was further found that in some settings, such as camps for displaced people, women did not report SEA due to a lack of information, whereas if members of the militia violently raped people, they would immediately denounce it. Although the responsibility to denounce SEA clearly does not rest with women, this does nevertheless suggest a confusion over what constitutes SEA in different settings and by different actors.

Research conducted by Translators Without Borders (Hasan, 2019) has further highlighted a lack of gender-sensitive messaging resulting in a gap in comprehension of Ebola-related community messaging, with women consistently scoring lower than men across pictorial, auditory and written messages, while missing out on sensitisation messages on radios, which are often purchased and dominated by men in households. Indeed, female victims and survivors in Beni reported lacking awareness of hotlines and other ways to report abuse (Flummerfelt and Peyton, 2020b). This is further corroborated by Kapur’s (2020) analysis of the Ebola response, which highlighted a ‘gender gap’ in communications perceived to be confusing. Nobert (2017) further argues that awareness and reporting mechanisms are often not inclusive for minority groups, either by contradicting local customs, failing to cater to low literacy levels or by not including enough female staff in contexts where victims and survivors feel more comfortable discussing sensitive issues with them. Bruce-Raeburn (2018) and Kachingwe (2018) repeatedly emphasise the absence of local feminist expertise in the development of safeguarding standards and policies.

Although there is a lack of evidence on what works in this area, there is emerging consensus on what could be done. Holt and Ratcliffe (2019) highlight quick measures that could improve gender-sensitive messaging, including working closely with local women’s groups to ensure appropriate tone and relevant communication forms, targeting messaging to highlight that aid services are free (and therefore sex is not required) and advising women to only meet job recruiters who are wearing official badges. Refugees across Namibia, Kenya and Myanmar similarly noted that more SEA interventions should publicise that services are free and that aid service-users are not expected to give anything in return (Lattu et al., 2008). Kapur (2020) emphasises the need to hyper-localise key messages on PSEA, including disseminating information on reporting incidents, referring cases and submitting complaints that can be comprehended by people of all genders, ages and linguistic diversity. Further recommendations include gender-sensitive hiring practices, involving more female community actors in aid distribution, co-developing resources and, in more patriarchal contexts, working with nominated, trusted community representatives and identifying safe or anonymous spaces for women to share their voices (Potts et al., 2021).

Lack of relevant reporting mechanisms and competing platforms

The success of any measure to tackle SEA depends on the willingness and ability of victims and survivors to report their experiences, ultimately helping to strengthen both prevention and accountability. The literature demonstrates a wide range of challenges in SEA reporting in humanitarian settings, arguing that efforts to foster a more enabling environment have been “largely inadequate” (Schauerhammer, 2018, p. 14) and that demand for reporting mechanisms will only increase when they are made more relevant, accessible and safe. Research

conducted by Ground Truth Solutions in 2018, including interviews with 5,000 affected people across seven major humanitarian operations, found that just over half of respondents knew how to make complaints to agencies (Van Praag, 2019). The majority noted a preference for direct communication through their own community representatives rather than by phone (to which many lacked access) and complaints boxes. This is further highlighted by the 2020 study in the DRC by Henze et al, which found that many people did not have access to the internet and were required to privately report cases. Nevertheless, despite clear concerns about hotlines,²¹ they have continued to be scaled up across humanitarian aid settings. After Cyclone Idai, several relief agencies set up a “plethora” of hotlines, while in the DRC, agencies set up competing email addresses and suggestion boxes, undermining the effectiveness of those which already existed and confusing victims and survivors (Van Praag, 2019; Flummerfelt and Peyton, 2020b).

“Having a hotline that can be called an ‘accountability mechanism’ ticks the community engagement box for aid agencies and donors alike. Although they may serve a purpose for people seeking information and registering complaints, it is irresponsible to equate them with accountability.” (Meg Sattler, Expert on Accountability to Affected People, quoted in Van Praag, 2019, para. 7)

This is further complicated by supply chains involving lots of upstream and downstream partners with varying awareness, capacity and resources in understanding what to report to whom and how to act upon cases (DFID, 2019). For example, Henze et al. (2020) found that, while most INGOs in the DRC had clear and accessible reporting systems in place, often at visible locations, UN systems were less visible, resulting in some UN staff being unaware of how to report suspicions.

Investing in inter-agency mechanisms to increase trust and collective action

The literature indicates that inter-agency community-based complaints mechanisms, including complaints boxes overseen by steering committees of different aid agencies, can be more effective in responding to SEA than the conflicting individual mechanisms outlined in the previous sub-section (Schauerhammer, 2018; Hileman and Burnett, 2016; IASC, 2012). These can help to frame PSEA as a collective, all-important issue to aid agencies, and provide an opportunity for victims and survivors to submit reports to separate agencies from those affiliated with perpetrators, helping to address fears around reprisals. They have also proven effective in facilitating inter-agency collaboration to identify and distinguish aid workers in cases where their respective employer is unclear, while helping to maximise resources and oversight on SEA (Schauerhammer, 2018). Building on this, in 2016 the IASC drafted the Global Standard Operating Procedures on Inter-agency Cooperation on Complaints Mechanisms, helping to fill a major gap in field-level coordination and provide a streamlined ‘template’ showing stakeholders how they can share reporting information while respecting data-protection policies (Hileman and Burnett, 2016). This also delivered on key FCDO recommendations to “break down silos” and “drive up standards collectively on safeguarding across the sector” (IDC, 2019, p. 16). Although inter-agency mechanisms have been piloted as far back as 2011, implementation generally remains weak, and many humanitarian agencies are still hesitant to submit internal disciplinary and reporting processes to external review (Hilhorst, 2018).

Sensitising reporting and complaints mechanisms

There are clear gaps in tailoring mechanisms to the diverse needs of vulnerable groups. In Chad, for example, hotlines can reinforce gender gaps given the disproportionate number of men with access to cell phones in comparison to women, and few aid agencies have the capacity to interact effectively with callers in a country with over 100 languages and dialects (Van Praag, 2019). A pilot of complaint boxes by members of the IASC in refugee and IDP camps in Ethiopia and the DRC found that several boxes were destroyed due to resistance from communities, with mistrust intensifying the longer the destroyed boxes remained visible. A study by the Humanitarian Accountability Partnership (2010) similarly found that complaints boxes were not well received due to a lack of confidentiality, no clear guidelines on their purpose and an absence of local focal points to engage with. Hilton’s (2008) research in Cambodia found that boy victims and survivors were deterred from using

²¹ Van Praag’s search of ALNAP’s humanitarian evaluation database shows that there have been no studies specifically on their effectiveness, including the extent of follow-up of reports made through hotlines or complaints mechanisms.

mechanisms that emphasised the vulnerability of women and girls, fearing their perpetrators would not be held to the same level of accountability.

Schauerhammer (2018) highlights the importance of presenting complaints mechanisms neutrally, while consulting communities to cater to different preferences. Drawing attention to the role of community members in PSEA efforts has been perceived as confrontational in certain settings, such as IDP and refugee camps in Ethiopia and the DRC (Danish Refugee Council, 2016). CARE International trialled a more neutral approach in Timor Leste after local staff resisted its SEA complaints mechanism and Officer in Charge's job title (referring to SEA) due to fear of being actively monitored for misconduct or losing aid. Community members suggested using more neutral language such as 'Community Liaison Officer' and 'feedback and sharing mechanism' and recommended a session on what constituted inappropriate behaviour. They further expressed a preference for locked complaint boxes and direct engagement with the Community Liaison Officer, resulting in them feeling more comfortable reporting future SEA concerns (Schauerhammer, 2018).

Community focal points and service-user reference groups

The literature highlights the importance of proactively engaging with affected populations, using the most relevant and accessible platforms available to them. In Myanmar, refugees expressed a preference for reporting SEA cases directly to local women's organisations and SGBV committees rather than humanitarian agencies (Lattu et al., 2008). Schauerhammer (2018) suggests that women's rights organisations could serve as an 'independent body' to receive complaints²² and ensure that victims and survivors do not need to interact with aid agencies and retraumatise themselves. Wood (2015) further highlights successful approaches to raising awareness on SEA mechanisms across different countries, including community meetings and use of youth leaders in Sierra Leone, an awareness-raising festival in Jordan, audio-visuals and sign boards in El Salvador, and interactive, child-friendly painting sessions for illiterate children in Nepal.

Service-user reference groups also offer promising practice. Save the Children piloted these following consultation with community members on preferred SEA reporting mechanisms. Following this, it was able to identify that children preferred face-to-face interactions over written complaints or suggestion boxes, and adults sought to raise concerns with trained community representatives who acted as a confidential liaison on complaints between communities and aid agencies. Tearfund also trialled the approach, whereby respected youth, women, elders and church volunteers received questions, feedback and concerns from community members and communicated these to Tearfund and other NGOs promptly (Schauerhammer, 2018).

4.4 Survivor-centred approaches

Following the 2018 Safeguarding Summits, the UK acknowledged that "a victim or survivor-centred approach is paramount" (Schauerhammer, 2018, p. 29). This requires meaningfully integrating the experiences, needs, dignity and voices of victims and survivors in the design as well as delivery and follow-up of PSEA efforts, from co-designing reporting and awareness-raising mechanisms to taking part in decision-making processes and ensuring their consent and protection of confidentiality throughout (Bond, 2021). There are limited examples of good practice on survivor-centred approaches in PSEA efforts in humanitarian aid settings (Bishop and Hassan, 2018) and many organisations still lack clear, non-generic procedures for supporting survivors (Mazurana and Donnelly, 2017).

Victim and survivor recommendations

The literature does reference several direct recommendations from victims and survivors. Refugees in Uganda have advocated for more female aid workers in distribution processes and the establishment of a response mechanism for women and girls to 'sound an alarm' when in risky situations (Potts et al., 2020b, p. 15). Refugees across Namibia, Myanmar and Kenya recommended that humanitarian aid agencies move beyond the 'formality' of codes of conduct and bring these obligations to life more with employees. They further recommended that the job performance of aid staff should be more closely monitored, that independent contractors should be held

²² It should be noted that women's rights organisations, however, would not necessarily be appropriate intermediaries for male victims and survivors.

to the same standards of conduct irrespective of the duration of their work, and greater investment in educating aid service-users about complaints mechanisms (Lattu et al., 2008).

Men in Syria suggested piloting remote therapy for male victims and survivors over Skype (thereby creating a safe space), promoting men's health services without specifying SEA, raising awareness of SEA through less contentious development work (such as livelihood activities) and promoting male victims and survivors who are willing to speak out (Chynoweth, 2017).

"We need to see living examples of [male survivors] who came forward and benefited [from SEA services], who actually got better. Once we see this, then others will come." (Khalil, community representative in Jordan, quoted in Chynoweth, 2017, p. 65)

"If an NGO set up a centre [for male survivors], of course no one will come at the beginning. The same thing happened with the women... but they kept going and now they are accepted... NGOs just have to do this and the men will come, eventually." (Yousef, community representative in Syria, quoted in Chynoweth, 2017, p. 65)

Protecting victims and survivors during reporting and investigations

The literature highlights a fundamental problem in the fact that men are often responsible for handling SEA reports, leading some victims and survivors to fear reporting due to possible repercussions and a belief that challenging those in authority is unacceptable. Studies also highlight a fear of stigma in using reporting mechanisms, especially for girls where known SEA "reduces her chances of marriage but also her parents' chances of obtaining a good dowry for her" (UNHCR and Save the Children UK, 2002a, p. 72). In its evidence to the IDC's inquiry, the Overseas Development Institute noted that accurate reporting cannot be done if mechanisms are controlled by the agencies to which the complaints would be lodged, and that "effective mechanisms need to be designed and implemented with affected people to create an environment of trust and security" (ODI, 2018, p. 5).

Building on this, there is also a need to identify good practice for supporting victims and survivors' safety during investigations, especially in contexts where perpetrators have the legal right to identify and cross-examine survivors or where their complaints are discredited, which can lead to re-traumatisation (Sriskandarajah, 2021). The literature indicates an over-reliance on physical evidence required to substantiate SEA claims, despite significant challenges in documenting SEA. In reference to rape, UNHCR and Save the Children UK (2002a, p. 74) noted that "most survivors do not report on time. Because the doctors' reports are so focused on physical evidence, when they find none, they will say that no rape has occurred." The situation has not changed dramatically since; refugees across Namibia, Kenya and Myanmar noted that not having "tangible proof" of SEA was an insurmountable barrier that discourages reporting, with many concerned that if they brought a complaint forward, they would be accused of making false accusations to obtain resettlement (Lattu et al., 2008, p. 21). Hingley and Olusele (2019, p. 49) further highlight the "largely unacknowledged tension" between the drive for justice and potential compromises of survivor-centred approaches and protection provisions, noting that investigations often undermine survivors' rights and put them at risk of retaliation while waiving their right to anonymity. Another common problem facing SEA investigations is a misunderstanding of the standard of proof in administrative investigations, with investigations tending to apply a criminal standard of proof (for example, beyond reasonable doubt) as opposed to the lower standard of the balance of probabilities (Cornish, 2021). This also works against victims and survivors where the case involves two conflicting accounts and a lack of additional evidence.

There are some emerging areas of promising practice in this regard, including the use of digital tools which may offer a mechanism for documenting and investigating SEA while protecting survivors' right to privacy. UNICEF's work on SEA has led to the development of the *U-Report* tool for anonymously reporting SEA by aid workers in emergency contexts (Blavatnik School of Government, 2019) and researchers at King's College London have successfully tracked down historic perpetrators of sexual abuse in humanitarian and sex tourism settings using newly developed genealogy technology, which may ultimately require less invasive requests for evidence from victims and survivors (Roberts, 2021). There is also a clear need to increase transparency and keep victims and survivors better informed on the status of investigations, with a risk that ceasing communications during the

process can cause significant harm and reduce trust in reporting mechanisms which are subsequently seen as a “black hole” (Schauerhammer, 2018, p. 12; see also Hingley and Olusese, 2019; Sriskandarajah, 2021). Further good practice includes keeping complaints to selected advisers on a ‘need to know’ basis.

Building safe spaces to facilitate reporting

There is limited evidence on effective approaches to improving the safety of reporting, although findings from a two-year pilot project in refugee camps in the DRC and Ethiopia by the IASC Task Force on PSEA in Humanitarian Crises found that building Women’s safe houses into established structures (such as health centres) helped to build victims and survivors’ trust in reporting cases of SEA and ensure they were not immediately identifiable from other health centre visitors. Other learning included the importance of ensuring staff opened complaints in the presence of community stakeholders and providing regular updates on responses through community representatives to build trust. As a result, adolescent girls perceived more respectful treatment by humanitarian staff. Self-reported understanding of SEA also increased in the DRC from 10 to 70% and in Ethiopia from 30 to 81% (Schauerhammer, 2018, p. 8).

Victims and survivors have made further suggestions of good practice, including limiting the ‘chain’ of people involving in processing reports and for humanitarian aid agencies to work more closely with local ‘gatekeepers’ who can misdirect SEA reports for their own gains (Lattu et al., 2008).

Evidence suggests that children are unlikely to report safeguarding issues unless they have first received awareness raising and sensitisation (Wood cited in Schauerhammer, 2018). Child Feedback Committees formed of elected child representatives can provide a safe, peer-to-peer forum for children to voice complaints and suggestions regarding SEA. World Vision implemented this approach in IDP camps in Tanzania, with children voicing concerns about rape and other forms of sexual abuse (Wood cited in Schauerhammer, 2018). ECPAT International’s Youth Partnership Project for young victims and survivors of SEA is also helping to support adolescents who are sometimes deterred from accessing SEA services that they perceive to be targeting adult women, empowering them to raise public awareness about SEA and demand greater action from decision-makers through training, media advocacy and peer support (ECPAT International, 2007).

Barriers to justice and recourse and importance for victims and survivors

Another key gap in terms of ‘what works’ is how to strengthen avenues to recourse for victims and survivors of SEA in humanitarian aid contexts, whether this be justice through prosecution of a perpetrator or reparations. The reasons for this are complex and dependent on context.

While SEA cases in international peacekeeping contexts can technically give rise to multiple avenues of recourse through the jurisdiction and prosecution by troop-contributing countries (though this is rarely the case), Ferstman (2020) argues that the humanitarian aid community has largely ignored the issue of liability for SEA, focusing on protecting potentially vulnerable people rather than recognising and putting in place measures to address the rights of those who have already suffered. Humanitarian personnel are historically present in host states on a temporary basis, and after an SEA allegation is made, perpetrators can leave the country – sometimes at the insistence of their employer.²³ Once they are outside of the country, extra-territorial claims for damages are difficult to pursue (Ferstman, 2020). While a claim against a humanitarian organisation can be lodged for negligence and vicarious liability through the courts of a host state, this is often inaccessible in conflict contexts and civil courts are notoriously time-consuming to navigate. Victims and survivors are also likely to face cultural and political resistance where host country laws do not comply with international definitions of SEA. Although claims can also be brought in the country where an organisation is registered or headquartered, it can be challenging for victims and survivors to assemble evidence to the required standard for recognition of foreign civil rulings (Sandvik, 2019b).

²³ ICAI (2020) also found that the UN often waives the immunity of perpetrators in humanitarian contexts due to the standards of due process, fair trials and rule of law.

It is clear from victim and survivor testimonies, however, that justice is a priority which helps to underscore wrongdoing and serve as a catalyst for wider institutional behaviour change (Ferstman, 2020). Survivors in the DRC emphasised the importance of pursuing and publicly sanctioning perpetrators, noting that if they continue to operate without consequence, it will be “forever difficult for survivors to report abuses” (Henze et al., 2020, p. 33). In certain countries and legal frameworks, including the DRC, pursuing judicial sanction is also necessary for victims and survivors to claim civil damages and interests in criminal cases under national law (Henze et al., 2020, p. 33). Henze et al. (2020) argue that sanctions are equally important for the integrity and reputation of the broader humanitarian aid sector, providing an opportunity to publicly honour zero-tolerance policies and challenge perceptions that they respond to SEA with “a reactive, cyclical approach, driven by concern for reputational management” (IDC, 2018, p. 4; see also Agams, 2018).

“[The perpetrator] should be punished for his sexual abuse of all those girls in Beni as a lesson to these international organisations that this should not happen again... I would just like justice to be done.” (Key informant in Beni, DRC, quoted in Chent and Maliro, 2021, para. 31)

Compensation, reparations and material assistance

As highlighted in ICAI’s earlier PSVI/SEA literature review (2020), compensation, reparations or material assistance can for some victims and survivors be seen as a form of justice and accountability, in that it may provide an opportunity for them to be restored back into their community and re-establish their lives in contexts where prosecution through formal court processes is extremely complex. The literature suggests that there is currently no mechanism for victims and survivors of SEA perpetrated by staff or personnel from humanitarian aid agencies to claim compensation, reparations or material support (Ferstman, 2020).²⁴ While standard-setting texts refer to the importance of victim assistance, understood to entail, in principle, medical, legal, psychosocial and material care, this is not formalised consistently.

International human rights frameworks such as the Committee on the Elimination of Discrimination against Women advocate compensation for victims and survivors, and regional multilateral organisations such as the African Commission emphasise the duty of states to “provide remedies to victims” of SEA taking place in their territory or jurisdiction committed by state and non-state actors, defining appropriate forms of remedies as “restitution, compensation, rehabilitation and satisfaction and guarantees of non-repetition” (Ferstman, 2020, p. 22). Gleeson (2015) argues that much less attention has been given to redress for victims and survivors by NGOs. There is a further research gap in terms of the link between assistance and payments made to silence victims and survivors, such as through customary justice mechanisms which can drive SEA ‘underground’ (Lattu et al., 2018).

Ferstman (2020) concludes that the aid sector has fixated on treating victims and survivors of SEA as potential ‘beneficiaries’ of assistance, ignoring their right to remedies as framed in international human rights law or private law of tort:

“Reparation is not a perfect solution and will undoubtedly not serve all of victims’ interests... It is particularly difficult to implement, especially in contexts of extreme poverty and where there is often little proof of the underlying crimes. But it is not impossible...there is an array of experience in providing accessible, context-specific and affirmative reparation measures. The difficulties associated with it do not justify the failure to put systems in place.” (Ferstman, 2020, p. 33)

The role of trust funds in redress

Trust funds can offer a form of redress in contexts where it is challenging for victims and survivors to pursue compensation or other remedies. For instance, in 2016, the UN Secretary General created the Trust Fund in Support of Victims of SEA to support UN and non-UN entities to provide assistance, followed by its 2019 Protocol on the Provision of Assistance to Victims of SEA, which outlines common norms and standards to strengthen a coordinated, system-wide approach to providing assistance, prioritising victims’ rights and dignity (HMG, 2020). Nonetheless, there is a lack of evidence on their effectiveness in supporting victims and survivors. Ferstman

²⁴ Article 75 of the Rome Statute of the International Criminal Court (1998) defines reparations as including restitution, compensation and rehabilitation.

(2020) warns that any assistance should not be perceived as diminishing or replacing the responsibility of perpetrators to be held accountable legally and financially, nor an acknowledgement of the acceptance of responsibility by alleged perpetrators.

Community-led redress

A potentially promising avenue of good practice from the development sector is community-led redress efforts. In Bigodi, Uganda, local community members mobilised to demand redress for SEA perpetrated against teenage girls by construction workers employed by a World Bank-funded project, and in doing so, catalysed system-level changes aimed at preventing similar abuses in the future (Berger, 2018). Local NGO Joy for Children first uncovered the issue and assisted community members in a multi-year effort to document cases. Local police were unwilling to investigate cases and the Ugandan National Roads Authority, the implementing agency for the project, was allegedly riddled with corruption. The community advocated to the World Bank's independent Inspection Panel, calling for a response to the specific harm caused and improvement of underlying safeguarding policy failures that enabled incidents in the first place. Efforts were successful, with the Bank cancelling the project and implementing a number of support programmes to affected communities (including psychosocial support, life skills training and a programme to enhance referral mechanisms).

Enabling factors included the sustained advocacy of national and international civil society partners, the willingness of the community to keep pushing for justice despite opposition from the government, and the presence of an independent Inspection Panel (without which, the Bank may have continued "sweeping the problem under the rug"). Berger (2018, p. 12) notes "it is rare to find community members willing to continue to speak out and push for remedy around sensitive issues such as sexual abuse of children". The study identified a number of recommendations including enforcing codes of conduct for contractors with specific prohibitions against SEA, mandatory disclosure of past incidents triggering more intensive due diligence and requirements for contractors on high-risk projects to demonstrate capacity to manage complex SEA risks.

4.5 Improving information sharing and action between agencies

The literature highlights that weak vetting processes, coupled with "institutional weaknesses" in sharing information between aid organisations, has historically resulted in perpetrators being "recycled in a cosy system" (Parker, 2018, paras. 21, 39; see also Ferstman, 2020; IDC, 2019; Anders, 2018). A number of initiatives are providing a useful starting point for logging substantiated allegations across the sector. However, these have largely concentrated on investment at the international level rather than being tailored to local contexts, and there is an ongoing need to reduce the scope for loopholes.

Strengthening employee vetting and identifying previous misconduct

To address this challenge, the Inter-Agency Misconduct Disclosure Scheme (MDS) seeks to prevent perpetrators from moving around the aid sector undetected. Developed by the Steering Committee for Humanitarian Response, the scheme supports its 70 member organisations to check references and share SEA information pre-dating five years. As of 2020, 10,476 requests for information had been made through the scheme and it had prevented the hiring of 75 staff between 2019 and 2020 (Steering Committee for Humanitarian Response, 2020). Nevertheless, reports suggest agencies are wary of joining for legal and other reasons (Hargrave, 2021) and commentators argue that the scheme lacks a mechanism for ensuring information is derived from a fair and objective process and will require a system of independent review if it is to be rolled out as mandatory (Olusese and Hingley, 2019).

"The scheme leaves it to the employee to challenge misconduct findings in the jurisdiction of the organisation making the disclosure. This may not provide redress if contracts are governed by countries with weak labour protections – some of which are the biggest recipients of aid. Disputing a claim in a foreign court can be prohibitive given the cost, language, and legal barriers – imagine a worker from South Sudan trying to challenge an organisation in Norway." (Naik, 2020, para. 7)

Further questions include how the scheme will address ongoing loopholes regarding UN contractors who are tracked in different systems which are not part of the scheme (Kolbe, 2015; Spencer, 2018). Although the UN

launched its own ClearCheck system in 2018 to ensure personnel dismissed due to substantiated SEA allegations are not re-hired in another part of the UN system, and subsequently launched a Protocol and tools for assessing and dealing with partner safeguarding capacity, this does not help to facilitate communication on SEA cases involving non-UN personnel, of which there were 602 reports in 2017 (UN, undated).

FCDO's £10 million Soteria project is still under development, but aims to set up a global register of SEA offenders and prevent the hiring of convicted perpetrators, drawing on INTERPOL to manage complex legal cases. Naik (2019, para. 7) draws attention to the scheme's assumption that an SEA perpetrator is "a western paedophile infiltrating aid agencies", neglecting to acknowledge opportunistic perpetrators who take advantage of lax standards. She argues that the scheme "tinkers with the periphery of the issue" because victims and survivors often do not report cases and weak systems of law in humanitarian contexts often define cases of SEA as breaches of internal codes rather than criminal laws, thus raising questions about what investment in checking criminal databases will achieve. DFID (2019) itself previously noted that relying on background checks during vetting and recruitment can be successful in uncovering prior incidents, but can miss SEA incidents under current investigation, individuals who have not been detected or opportunistic offenders. Further, the fact that many consultants are contracted on a project-by-project basis (often for different donors) exacerbates the challenge of obtaining accurate references.

Finally, the concept of a global register of aid workers has been around for many years, but questions have been raised about its legality and practicality for humanitarian organisations that need to hire people at short notice following emergencies (Jóźwiak, 2018) and may struggle to implement such a "complex, Western-based system" (Williams et al., 2021, p. 4). The Aid Worker Registration Scheme being developed by FCDO aims to set up a register of aid workers globally which can work in conjunction with the MDS and the Interpol Soteria project to facilitate checks of past employment records in an ecosystem of linked initiatives. Naik (2019, para. 6) questions the efficacy of the concept, given that a significant number of the world's aid workers are locally recruited, often casual labourers, and in contexts without basic record keeping. She also warns that it threatens the sector's broader localisation agenda and "risks excluding aid workers from the Global South from the market if they are unable to prove their credentials". She concludes that the scheme "in effect, brings about the professional regulation of aid workers via the back door and without the usual safeguards, such as independent decision-making; legal expenses insurance; right to representation; or proportionate sanctions" (Naik, 2019; see also Dross et al., undated; Davies, 2020). The IDC reaches a similar conclusion, noting that employment cycle schemes "designed to prevent perpetrators of SEA from being re-hired in the aid sector will only work if perpetrators are reported and robust investigations undertaken", highlighting a risk that the scheme could be used to retaliate against people who raise legitimate concerns (IDC, 2021, pp. 11-12). Williams et al. (2021) instead argue that a national registration scheme, comparable to the UK's Disclosure Barring Scheme, to be supported by international donors but run by national bodies with responsibility for vetting and registration, would be more effective.

Humanitarian ombudsperson

The literature is generally more in favour of an independent humanitarian watchdog to monitor SEA developments, carry out and verify investigations on the ground and lobby governments, aid agencies and the media (Parker, 2018; Mitchell and Doane, 1999; Mitchell, 2018; Csáky, 2008), although it is recognised that an ombudsperson institution would face a range of challenges, including how it interacts with or might overlay other national and international justice and accountability mechanisms and how it retains its independence vis-à-vis the bodies funding it. Despite the Charity Commission providing important regulatory oversight of UK charities, there has been less progress in sector-wide initiatives designed to hold NGOs accountable, with initiatives such as the Core Humanitarian Standard relying on the voluntary buy-in of organisations who ultimately retain power to independently address SEA.

The IDC (2019) argues that, without an independent ombudsperson, victims and survivors will continue to lack an avenue through which to appeal established reporting channels that fail them – a fair part of any fair system or justice. The case for an ombudsperson is made stronger due to the challenges faced in self-regulation mechanisms within the aid sector, which rely on organisations volunteering to be reviewed. In 2018, for example,

Oxfam was audited and certified by the aid sector's self-regulatory process, the Humanitarian Quality Assurance Initiative, yet the landmark independent commissioner's report (2019) revealed the organisation lacked "robust, confederation-wide safeguarding policies and procedures" and had "ineffective reporting mechanisms... and accountability gaps" (IDC 2019, p. 3).

"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." (Hilhorst, 2018, paras. 10, 12)

Hilhorst (2018) suggests a potential mandate for an independent ombudsperson, noting that the aid sector could recruit trusted, preferably national, ombudspersons in each of the countries where aid agencies have a large presence, who would be responsible for investigating allegations of power abuse and misconduct in line with international humanitarian standards and relevant domestic legislation. The ombudsperson would have the mandate to inform and monitor recommendations rather than sanction given that there is no central body with the jurisdiction and ability to enforce decisions. She further highlights that an ombudsperson could wield symbolic power and influence by "signalling that NGOs accept external oversight" (para. 15).

The ombudsperson concept was further scoped following the 2018 SEA scandals through an initiative by the Dutch government, which developed a proposal for a two-tier structure: a first tier relying on local mechanisms and a second international appeal structure to consider unresolved complaints (Hilhorst, 2018). Although the ombudsperson scoping study report found the idea to be popular among working-level aid workers, the UK government did not back it, citing a lack of institutional support in the sector (Edwards, 2019). The Dutch initiative continues with pilot projects aimed at exploring local complaints mechanisms (CHS Alliance, 2021) and there have been other proposals put forward, including Code Blue's proposed special court mechanism for dealing with UN cases (Code Blue, 2018), a new proposal for an Independent Commission for Voices in Crisis put forward by the UN itself (Hilhorst, 2021) and a lightweight ombudsperson proposal based on leveraging the authority of donors (Naik, 2018a).

4.6 Addressing power imbalances and discrimination within NGO culture

Finally, there is broad consensus in the literature that current energy and resources will not be sufficient without tackling the structural issues which have been explored in Section 3. FCDO has similarly recognised that organisational culture and behaviour change 'from the top' is essential in addressing the power imbalances that lead to SEA (DFID, 2019).

This is clearly a long-term process requiring sustained effort and investment over many years, although there are emerging areas of potential good practice. Olusese and Hingley (2019) note several recommendations, including addressing gender bias and discrimination within organisational recruitment, retention and promotion practices to avoid conditions which may enable the exploitation of vulnerable populations. Vijfeijken (2019, p. 6) argues that the various initiatives taken by NGOs to date, including appointing safeguarding staff and implementing codes of conduct, must be combined with "the encouragement of certain habitual and widely shared, repetitive behaviours and the discouragement of others", which can be done by discouraging wider organisational power imbalances which indirectly enable SEA. This includes investing in leadership training to nurture strong self-awareness and personal accountability, promoting good behaviour through early adopters or 'culture carriers' and 'calling out' displays of behaviour which indicate an abuse of power. O'Hara and Omer (2013) reiterate that, fundamentally, leaders need to be on the lookout for any organisational 'blindness' caused by a collective attitude of 'pseudo innocence' and take this on publicly in a forceful manner. Several UK-funded initiatives seek to make a start at addressing this issue, although it is too soon to determine effectiveness – this includes Bond's Training Tool on Organisational Culture Change and FCDO's Open University training on advanced safeguarding leadership.

5. Conclusion

This literature review has presented evidence which suggests that existing PSEA interventions have generally not been sufficient in addressing the deeply entrenched, structural drivers of SEA within the humanitarian aid sector. Despite increased international attention and momentum in relation to the issue in recent years, perpetrators are still able to move around the sector with impunity, while victims and survivors and whistleblowers face significant risk of reprisal and knowledge that their experiences may be covered up or disregarded if reported. There is a notable lack of evidence on survivor-centred approaches, redress mechanisms or efforts to reduce the vulnerability of groups identified in Section 2, all of which point to important considerations for future work.

The review has identified examples of interventions that have not resonated with target communities, including different types of social media campaigns, hotlines and complaints mechanisms. Many of these have been part of the flurry of responses to the sector's SEA scandal following Oxfam's allegations in 2018, and have often taken a top-down approach without sufficient consultation or listening to the expertise of local partners, communities, and victims and survivors themselves. Tensions have been identified regarding misconceptions and assumptions around perpetrators, which have led to a focus on international-level vetting and accountability schemes that do not sufficiently recognise the complexities of local contexts.

Some areas of potential good practice are emerging, although the evidence base remains weak. These include the use of Child Feedback Committees, service-user reference groups and community-led redress mechanisms, the use of technology to collect data in a safer, more standardised way, and the concept of a humanitarian ombudsperson. There is, however, no silver bullet for addressing SEA in humanitarian contexts, and interventions will need to be closely tailored to the specific contextual constraints and opportunities in each humanitarian setting. The literature clearly acknowledges that efforts will not be successful unless the structural drivers of SEA in organisational cultures are addressed.

Finally, the literature review suggests a particular gap in knowledge of what works in PSEA in humanitarian aid settings, including:

1. How to better empower and protect victims and survivors, whistleblowers and wider communities to know their rights, safely report cases and participate and keep actively informed as part of PSEA investigations and efforts.
2. How to better manage assets such as supplies and jobs to avoid misuse.
3. How to strengthen the consistency of data, reporting and ethical sharing of information through supply chains, as well as oversight and accountability when cases are reported.
4. How to increase feedback loops and learning between HQ and the field, including eradicating the immediate opportunity structures provided by weak procedures in humanitarian contexts, while engaging in longer-term organisational culture change.
5. How to develop longer-term transition strategies which do not leave people exposed when humanitarian aid response efforts depart.
6. How to design PSEA efforts that are inclusive of the variety of individual and contextual realities and vulnerabilities, including, but not limited to, persons with disabilities, children, and marginalised and stigmatised groups.
7. How to combat the structural realities of sexism, racism and disability discrimination in a practical and achievable way.

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