

# **ICAI follow-up: The UK's approach to safeguarding in the humanitarian sector**

A summary  
**July 2023**

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

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

## Individual review scores and what they mean



### **An adequate score means:**

- Enough progress has been made in the right areas and in a sufficiently timely manner in order to address the core concerns underpinning ICAI's recommendations.



### **An inadequate score results from one or more of the following three factors:**

- Too little has been done to address ICAI's recommendations in core areas of concern (the response is inadequate in scope).
- Actions have been taken, but they do not cover the main concerns we had when we made the recommendations (the response is insufficiently relevant).
- Actions may be relevant, but implementation has been too slow and we are not able to judge their effectiveness (the response is insufficiently implemented).

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# Executive summary

ICAI’s follow-up review is an important element in the scrutiny process for UK aid. It provides parliament and the public with an account of how well the government has responded to ICAI’s recommendations to improve spending. It is also an opportunity for ICAI to identify issues and challenges facing the UK aid programme, which helps to inform subsequent reviews. For each of the reviews included in the follow-up, we provide a score of adequate or inadequate, illustrated by a tick or a cross.

This document is a summary focused only on the results of the follow-up of our review of *The UK’s approach to safeguarding in the humanitarian sector*. The full follow-up report of all 2021-22 reviews, including overall conclusions from the process and details of our methodology and scoring, can be found on our website.

## Findings

### The UK’s approach to safeguarding in the humanitarian sector

FCDO has made notable progress in implementing the recommendations from this review, and we judge its response to be adequate. FCDO staff are increasingly looking beyond due diligence and compliance, have been supporting the development and application of a number of SEAH reporting and community engagement mechanisms, and have been working to improve the functioning of the department’s systems for investigating reported cases of SEAH. Although the department has supported some useful research on SEAH issues, important evidence gaps remain. In addition, the mechanisms for screening humanitarian workers which FCDO has been supporting are yet to show sustained results.



ICAI’s review of *The UK’s approach to safeguarding in the humanitarian sector* was published in February 2022 and scored the government’s approach as amber-red. The review examined the UK government’s effort to respond to the challenges exposed by several high-profile incidents that emerged in 2018 relating to sexual exploitation and abuse (SEA) of affected populations, perpetrated by aid workers operating in humanitarian aid contexts.

The review assessed the relevance, coherence and effectiveness of UK action on safeguarding. It covered the UK’s programming, policy and influencing activities on safeguarding over the period from 2017 to 2021, the years straddling the October 2018 international safeguarding summit that was hosted by the UK (known as the ‘London summit’) and at which the UK, alongside other key actors, made significant reform commitments.

Table 1: ICAI’s recommendations and the government response

Subject of recommendation	Government response
FCDO should focus greater attention on humanitarian responses in-country, supporting partners in implementing approaches to protection from sexual exploitation and abuse that are tailored to each context.	Partially accepted
FCDO should ensure that trusted mechanisms systematically capture the voices of affected populations, victims and survivors to inform policy and improve operations on sexual exploitation and abuse in humanitarian settings.	Partially accepted

FCDO should develop and implement a research agenda on protection against sexual exploitation and abuse that identifies and prioritises key evidence gaps, in particular on what is happening on the ground.	Partially accepted
FCDO should ensure that efforts to prevent the re-hiring of perpetrators of sexual exploitation and abuse include staff recruited in countries of humanitarian response, who make up the majority of humanitarian aid workers.	Accepted
FCDO should conduct a review of its approach to investigating allegations of sexual exploitation and abuse by humanitarian workers in order to address the points identified by this review.	Partially accepted

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

The original review found that the UK’s approach to promoting change in the humanitarian sector had focused appropriately at the global and systemic levels, and had aimed to find the right balance between prevention and response. It also noted that the UK’s approach was top-down in nature, and as a result change was not happening quickly enough at national level. Funding for the safeguarding systems of national and local humanitarian organisations receiving UK aid was insufficient. ICAI therefore recommended that FCDO should do more to support in-country responses and provide support to partners that is tailored to context. In its response to this review, FCDO argued that it was already supporting responses and partner needs in-country. It therefore partially accepted the recommendation and merely committed to continue its ongoing support and share best practice from its work.

Despite the limited commitments set out in FCDO’s response, this follow-up review finds that the department has made notable efforts to address this recommendation. FCDO staff seem to be growing in knowledge and confidence about preventing SEAH, and are increasingly looking beyond due diligence and compliance. In addition, the UK has been supporting a number of valuable multilateral initiatives, including the SEA Risk Overview (SEARO) index (an index for measuring SEAH risks across countries) which was endorsed by the Inter-Agency Standing Committee in September 2022 and will be used to prioritise the deployment of inter-agency coordinators for preventing sexual exploitation and abuse to the 15 countries with humanitarian contexts that are at highest risk of SEA.

As regards its support to national and local humanitarian organisations, FCDO highlighted the funding it is providing to the Humanitarian Quality Assurance Initiative Facilitation Fund, which can subsidise up to 90% of audit costs for small organisations to build capacity at the local level. However, it isn’t clear that this mechanism goes far enough in meeting the needs of local organisations.

Taken together, the body of actions underway are relevant and technically sound, and have contributed to stepping up FCDO’s safeguarding work at national level. ICAI therefore judges FCDO’s response to this recommendation to be adequate.

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

The original review found that, although the UK has made efforts to include the voices of victims and survivors as well as whistleblowers in discussions on safeguarding challenges,<sup>1</sup> there are no systems for ensuring that these groups are consistently informing strategy and response. It also noted that accountability to affected

<sup>1</sup> Most notably, the UK organised a ‘listening exercise’ before the London safeguarding summit.

populations had been relatively neglected, and that reporting and complaints mechanisms were still not being used by victims, survivors and whistleblowers. ICAI therefore recommended that FCDO work to capture more systematically the voices of affected populations to inform policy and practice. FCDO partially accepted this recommendation, arguing that there was an absence of systems for ensuring learning from consultations. FCDO also acknowledged that more could be done to ensure more people feel safe to report incidents, and noted that the department was exploring how to work with survivors more systematically.

In responding to this follow-up review, FCDO highlighted a number of valuable areas of its recent work to promote the voices of affected populations. FCDO is working to develop and pilot a digital feedback mechanism called 'Loop', which enables recipients of aid to feed back in real time about their experiences, including on SEAH. Under its Supporting Survivors and Victims of Sexual Exploitation, Abuse and Harassment programme, FCDO has been working to develop a methodology to seek feedback from victims and survivors of sexual exploitation and abuse. FCDO also continues to sit on the steering committee of a multi-year pilot project designed to close the accountability gap for survivors of SEAH (led by the government of the Netherlands and the Core Humanitarian Standard (CHS) Alliance), which will test new ways to address the accountability gap for victims and survivors of SEAH in Bangladesh, Ethiopia and the Occupied Palestinian Territories.

These efforts constitute an adequate response to ICAI's recommendation. However, ICAI would encourage FCDO to continue to innovate and explore ways of systematically engaging with crisis-affected people on an ongoing basis.

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

ICAI's original review found that FCDO had been working to improve the global evidence base on SEAH issues, and had also invested in the production of a number of evidence products.<sup>2</sup> However, little support had been provided to develop evidence on where, when and how exploitation and abuse take place, and on how humanitarian actors can practically address the underlying causes of SEA. ICAI therefore recommended that FCDO should build a research agenda that fills these and other evidence gaps. FCDO partially accepted this recommendation, noting that a new standalone research programme would not be value for money – even though this was not what ICAI had recommended. Instead, FCDO committed to address evidence gaps in its ongoing research programmes.

In responding to this follow-up review, FCDO emphasised to ICAI the value of the ongoing work of its safeguarding Resource and Support Hub, which has recently published research on safeguarding related to people with disabilities and a review identifying key lessons and best practice from its own mentoring programme. FCDO also noted its ongoing funding of work by the CHS Alliance and the Steering Committee for Humanitarian Response to collect and report data on the extent of SEAH challenges, and its support for the SEARO index.

However, as a demand-led facility, the Resource and Support Hub has prioritised action learning over commissioned research to fill evidence gaps. The other major research efforts that FCDO noted are focused on exploring how widespread SEA incidents are, and not 'what works' in operational settings. These actions are therefore judged to be inadequate as they do not address the core of this recommendation.

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

The original review noted that FCDO had recognised the lack of systems to screen for SEAH perpetrators among staff recruited in countries of humanitarian response (as opposed to international staff) and had supported relevant human resource processes to help address this gap. However, it also found that most of

2 These included the *Global evidence review of sexual exploitation and abuse and sexual harassment in the aid sector*, published in January 2021.

these processes had not yet been launched, and where they had (as for example the Misconduct Disclosure Scheme (MDS)), they were not yet able to screen staff recruited in-country. ICAI therefore recommended that FCDO should ensure that processes for screening potential staff in-country were developed. FCDO accepted this recommendation, noting its commitment to ensuring screening for all humanitarian workers, and its view that the MDS was already able to play this role.

FCDO's response to this follow-up review notes its ongoing work to support the MDS (including funding a staff member), which has to date been applied in over 86,000 recruitments and led to 230 applications being rejected. It also highlights its work to support Project Soteria – which facilitates cooperation between law enforcement agencies and aid organisations to identify perpetrators – and the Aid Worker Registration Scheme. However, these schemes do not yet provide the solution to the sector's challenges in this area. First, it is not yet clear what proportion of the MDS's screenings took place in countries of humanitarian response, as the MDS does not identify this, and there are concerns that not enough organisations are adopting the scheme. In addition, Project Soteria is yet to achieve impact at scale after more than a year of implementation, and there was a consensus among interviewees that the Aid Worker Registration Scheme is unlikely to be taken forward.

Although FCDO has provided significant support for developing new systems to screen humanitarian staff, it is not clear that the department is adequately prioritising this outcome for locally recruited humanitarian staff. ICAI therefore judges FCDO's response to this recommendation to be inadequate.

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

The original review reported that FCDO has made significant investments in developing its systems for investigating reported safeguarding cases. However, ICAI's investigations 'deep dive' found that FCDO's investigations case management system was not effectively prioritising reports of SEA perpetrated against affected populations, and that there were gaps in FCDO's internal guidance on processes for investigations. ICAI therefore recommended that FCDO should conduct a review of its approach to investigating allegations of SEA by humanitarian workers. FCDO partially accepted this recommendation, contesting ICAI's findings on weaknesses in its case management systems and internal guidance. It did, however, commit to keep its case management approach under review.

Despite having challenged ICAI's findings underpinning this recommendation, FCDO has taken notable action to address the concerns raised. Following publication of ICAI's review, the Safeguarding Investigations Team fully discussed the findings of ICAI's investigations 'deep dive', and identified 31 separate actions to improve its investigations systems. As of December 2022, 58% of the actions had been completed, with the remainder in the process of being implemented. Some actions will only be implemented following the rollout of an upgraded case management system, which is expected by July-August 2023. FCDO argues that resource constraints do not currently allow it to act on ICAI's guidance that the department should work proactively to identify SEAH cases.

Considering FCDO's range of actions on this recommendation, ICAI judges the department's response to be adequate.

## Conclusion

It is clear from this review that FCDO remains a global front-runner in taking forward action on addressing SEAH risks. This is illustrated by its notable responses to ICAI's recommendations to focus greater attention on in-country action, develop systems for screening humanitarian workers and strengthen its investigations case management systems. Nevertheless, FCDO needs to do more to ensure screening of humanitarian workers recruited in-country, to promote the voice of affected populations in debates on policy and practice on preventing SEAH, and to invest further in filling gaps in the evidence base on the causes and solutions to SEAH challenges. ICAI judges FCDO's action on this review's recommendations to be adequate.



This document can be downloaded from [www.icaei.independent.gov.uk](http://www.icaei.independent.gov.uk).

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