Safeguarding and Beyond –
Recommendations from the Gender and Development Network

Introduction

The Gender and Development Network (GADN) has developed a menu of recommendations on the way in which INGOs should respond to the recent revelations on sexual harassment, exploitation and abuse, based on the experiences and research of our members' organisations on this topic. We have organised these along the lines of the DFID/Bond four working groups on safeguarding, with an additional set of recommendations at the start on changing the way we discuss and present ideas about safeguarding and abuse.

Safeguarding is broadly understood to mean protecting people from harm, for safeguarding to be effective it is therefore essential to understand what specific harms different groups of people are exposed to, and to recognise the conducive contexts that enable and surround those harms. Underlying the recommendations in this document is the starting point that harassment, abuse and exploitation are manifestations of power inequalities, and that sexual abuse and exploitation is deeply rooted in inequitable gender dynamics. These inequalities also intersect with inequalities of race, particularly in the context of international staff, and the privileges of being a white man in a humanitarian/development context. Access to and control of resources underpin the inequitable power dynamic, creating a conducive context for the sexual exploitation of women and girls. Any safeguarding response will thus only be effective if it is grounded in an intersectional power analysis, recognising the both the pervasiveness of sexual abuse as part of the gender hierarchy, and organisational responsibility to minimise the conducive contexts and the harm therein. Organisations will need to recognise that sexual harassment, abuse and exploitation are not the actions of 'a few bad apples', but the products of existing and reproduced gender inequalities, intersected with race, and take appropriate action to ensure contextual safeguarding to reduce the exposure of women and girls to harm through their organisational and programming practices.

In this document we have focused specifically on the existence of violence against women and girls (VAWG), within organisations, programmes and communities, in recognition of the scale and prevalence of the abuse and exploitation perpetrated against them, and the broader context of unequal gender power and patriarchy that shapes the context and impact of abuse. But also in response to the absence of this perspective from many of the safeguarding responses we have seen so far. Moving forward though, if this is to be a seminal moment in the way that safeguarding is shaped for the future to improve standards and ensure dignity for all, then the specific experiences of LGBTQI people, people with disabilities and other marginalised communities must also be brought into the discussion. We recognise too that boys and men are also experience sexual harassment and exploitation, overwhelmingly by other men, and that their experiences should be addressed. Finally, this work will also need to be integrated with the implications for child protection measures, ensuring that these two strands of work are integrated.

Key to our recommendations is that INGOs and donors should:

1. Recognise the extent of past abuses and take **responsibility** for them, ensuring solutions and responses are led and developed by **women themselves**, and in particular survivors, women of colour and women from the global south.
2. Understand that the underlying problem is one of power abuses (of both beneficiaries and staff) – particularly around **power imbalances of gender and race** – and commit to addressing the way that these power imbalances manifest within organisations and through programmes, partnerships and advocacy.
3. Recognise that organisational cultures have not just overlooked incidences of sexual harassment, abuse and exploitation but have created a **conducive context for abuse** where abuses are enabled by the prevailing culture. Target and transform this context, or organisational culture, so that it is no longer conducive to abuse.
4. Act now **using organisational knowledge and intelligence** that already exists about the sites where abuse is known to be taking place, rather than waiting for individual reports of abuses, and take responsibility for developing interventions which recognise and act on informal knowledge and experience, in the context of gendered power inequalities.
5. Create and promote working environments and programmes which allow women and girls to be **safe from abuse and to be safe to fully participate**, free from the experiences of abuse and from the threat of and fear of abuse, which so often constrains women's and girls' full participation.

These recommendations are just a start - in the coming weeks and months we will be looking to share evidence on what works, sharing practical proposals on what needs to be put in place and building our understanding of the data available, and what still needs to be collected. For a more detailed explanation of the analysis behind many of our recommendations, see the report of our workshop: Safeguarding and Beyond.

Recommendations

1.   Changing the way discussions of safeguarding and abuse are framed

1.1) **This is an issue of gender inequality, women's rights abuses, and power imbalances including racial inequalities**. Racial inequalities are further exacerbated by neo-colonial legacies and attitudes, particularly in emergency responses. Language recognising the roots of this abuse needs to be gendered, needs to be concrete and needs to recognise the intersections of gender, race and class.

1.2) We need to commit to start at the bottom of the causal pyramid, **looking at the underlying causes of the problem** by tackling the culture of sexism and power imbalances that create the conducive context for these abuses, including a culture of impunity.

1.3) **Organisations must educate supporters and donors to understand this approach**; work with communications teams to redefine the frame and the narrative, and educate the public and donors on the need to tackle the causes of abuse as well as responding to abuse

as it happens. Organisational communication with supporters must be honest, nuanced and open; not smoothing over or smoothing out of issues, and working from the assumption that there is the potential for better dialogue with a supporter base to rebuild trust.

1.4) **The experiences, voices and views of women from the global south must be central**, and they must be supported to expose and discuss abuse by and within international organisations, international partners, and other civil society organisations.

2.   Accountability to beneficiaries and survivors (working group 1)

2.1) **As INGOs we must acknowledge that this is not about 'other people'** – it is about us; serious mistakes have been made by INGOs which have had significant consequences for the women in INGOs, and the women and girls participating in our programmes. It is not possible to move forward without sufficient acknowledgement of the impacts of these previous failures. Organisations should commit to learn from impact reviews and to recognise and document what has been lost through women and girls being excluded from participating in programming, through being marginalised in organisations, and through leaving their jobs and careers; losses to communities, organisations and to women and girls themselves.

2.2) **The experiences, voices and views of women from the global south must be central**, and they must be supported to reveal and discuss abuse and the context of abuse by and within international organisations, international partners, and other civil society organisations. Consideration should be given to ways to create safe platforms, led by women from the global south, for women to discuss sexual harassment, abuse and exploitation in and by INGOs.

2.3) **Consultation - foster and nurture dialogic relationships with women's rights organisations,** survivor organisations, children's rights organisations, specialist VAWG services and child protection agencies in HQ countries and in countries of operation; invite their perspective and expertise and ensure that their involvement in decision-making and contextual safeguarding is meaningful and influential. It is crucial to ensure that women's rights and VAWG experts are encouraged and enabled to use their expertise in relation to organisations, as well as their programming.

2.4) **INGO leadership must commit to listen, reflect, learn, and act over the longer-term**; recognising that 'the problem' is organisation wide with cultures and practices that have created a context conducive to abuse, not just a problem of just 'a few bad apples'.

3.   Shift organisational culture (working group two)

3.1) **Organisational culture** - changes in organisational culture are necessary in relation to safeguarding, and the recognition of sexual harassment, abuse and exploitation as issues of gendered power. Underlying sexism, racism, and power imbalances need to be addressed. It is not accidental that perpetrators abuse 'downwards', since their relative gender, economic and racial power (or combinations of these), together with their seniority, reinforce their impunity. Regular organisational gender equality reviews should be conducted with the

support of gender staff to highlight where gender discrimination and abuses of power are/could be taking place and action plans developed and resourced to address these issues.

3.2) **Recognising the conducive context of abuse** implies understanding that organisational cultures have not just overlooked incidences of sexual harassment, abuse and exploitation but have created a conducive context for abuse where such abuses are enabled by the prevailing culture, and left unchecked and unpunished.

3.3) **Definitions of VAWG, and sexual harassment, exploitation and abuse need to be linked to a recognition that these are holistic, systemic issues- not single 'incidents'**. Understanding the ways in which deflection, denial and disbelief within organisations create and maintain conducive contexts for abuse needs to be part of the analysis. Accurate and appropriate language should be used to name the problem, including the recognition that this is deeply gendered in both victimisation and in perpetration. Harassment, abuse and exploitation are built on gendered and other forms of power and this needs to be explicitly recognised. The relative privilege of white, northern women has not protected them from gendered experiences of abuse, but at the same time it has meant that their experiences are more visible than women facing intersecting discriminations.

3.4) **Leadership - promote and support feminist leadership in INGOs** and ensure senior leadership have gender expertise and experience, including women's rights experts on Boards.

3.5) **Collective responsibility - create and nurture organisational cultures of reporting, of raising issues, and of the responsibility of colleagues and witnesses to report**. There should be more focus on 'safety work' and being pro-active on abuse prevention to avoid an 'incident', And address the existence of conducive context for abuse so that it becomes a collective responsibility to maintain an environment where it is safe for women and girls to participate in programmes, and to work. Encouraging and embedding a culture of raising and documenting 'causes for concern' allows a bigger picture to be built without reliance on an individual, isolated report.

3.6) **Reporting at all levels - make it the responsibility of Boards and senior managers to change the contexts of their organisations, and not to wait for or rely on whistle-blowers**, with reporting on progress at all levels. Organisations must explore what 'contextual safeguarding' might look like across the work of the organisation, both within the organisation and in programming interventions in order to address the context in which abuses are occurring.

3.7) **Support for women's organising - support internal organisational spaces for feminist collective action with recognised influence**, and cross-organisational networking. Create space and resourcing for women to meet and discuss the issues that concern them at work, and support them to articulate and propose improved policies and practice. Ensure that this is within work time, recognised as part of their jobs, and directly linked to feminist senior leadership.

3.8) **Focal points,** on both gender equality and safeguarding should be resourced to enable matrix management by feminist senior leadership to hear initial issues. Cross-organisational advisory groups of feminist champions must also be directly connected to Boards and senior leadership. Resources should also be made available for designated specialist posts (similarly to finance and logistics in country offices) to ensure that there is oversight and accountability, and that focal points are not overloaded, or undermined. Use the information and knowledge generated through these positions and their relationships with partners and communities to inform and guide contextual safeguarding.

3.9) **Respectful partnership –** reinforce a culture where work with and support for women's organisations and movements in the global south is valued and prioritised**.**

3.10) **Reporting - report on harassment as well as abuse and exploitation and ensure abuse is fully documented** (an end to 'quiet chats') to generate comparable data between programming and organisational issues, and between organisations; use this data to document and analyse organisational cultures and practices that support a conducive context for abuse.

3.11) **Independent audits - accountability requires independent audits of safeguarding processes including prevention and response, and an external accountability body in the sector**, using gendered and intersectional power analyses. Recognising the failure of past independent reviews and redefining the 'problem' to address it properly is necessary. Using the data collected through an emphasis on the existence of conducive context for abuse will redefine the 'problem' and provide opportunities for more appropriate remedial action.

3.12) **Programme design - recognise that masculinised organisational cultures also create a conducive context for abuse in programming.** Standard programme design does not necessarily fully recognise the implications for women and girls of gendered inequality, or the ways in which it contributes to a conducive context for abuse. Programming design needs to be built on an analysis around: what would make women and girls safe to participate in programmes? What would make women safe to work in this partner organisation? (The 'safe to' approach). This approach would of necessity involve an analysis of the gendered conducive context for abuse, recognising the structural gender, hierarchy and race issues as foundational.

3.13) **Programme monitoring - build in indicators and reporting on the use of reporting mechanisms.** Design reporting mechanisms with women and girls during the situational analysis and design processes, based on what would be safe for them to use (the 'safe to' approach). Articulate specific indicators to monitor confidence in the use of these mechanisms, confidence in recommending them to others, and the trustworthiness of responses. Ensure that there are wider and appropriate contextual mechanisms to gather 'cause for concern' data, including building trustworthy and consistent relationships with specialist VAWG response services, and women's groups. Ensure that these are not 'tick-box' exercises, but based in an understanding of the need for on-going dialogic relationship building.

3.14) **Programme reporting - recognise that for women and girls participating in programming, the power inequalities are severe, and the risks of reporting**

profound. Build relationships with women's rights organisations and specialist response services to enable aggregated reporting of issues of concern. Ensure that pathways for sharing this information are not onerous or extractive for women's organisations, and take responsibility for being trustworthy and engaged in dialogic relationships. Take responsibility for identifying danger points and responding in ways that prioritise the creation of an environment where women and girls feel safe to participate. Be guided and informed by VAWG experts in the potential for retaliation and additional abuse, and design responses in relation to these wider risks. Invest in outreach and the visibility of focal points to make disclosive conversations routine; use all direct and indirect information shared to build a bigger picture and do not rely on individual complaints or reports. Do not wait for a catastrophic incident. Use a case management approach in responding to specific complaints, and commit time, resources, and skills to safety planning with survivors.

3.15) Ensure that **Child Protection systems** and processes are built on an analysis of gender and recognise explicitly the specific vulnerabilities of adolescent girls, and that child protection focal staff work closely with gender specialists within organisations and access training and support on gender issues.

4.   Improve safeguarding practice across the employment cycle (working group 3)

4.1) **Performance management -** include the promotion of environments where women and girls feel safe to participate in performance management and recruitment criteria, and require examples of action taken to promote such environments and the results of those interventions.

4.2) **Reporting at all levels - make it the responsibility of Boards and senior managers to change the cultures and contexts of their organisations, and not to wait for or rely on whistle-blowers**, with reporting on progress at all levels. Organisations must explore what contextual safeguarding might look like across the work of the organisation, both within the organisation and in programming interventions.

4.3) **Recruitment –** value an understanding of feminist power analyses of sexism and racism in recruitment, including it within job specifications, and ensure that core recruitment questions ask specifically about experience with and actions on reports of sexual abuse and exploitation in programmes and in the organisation.

4.4) **Induction –** include an understanding of power analysis in all inductions and make clear the importance that organisation gives to promoting cultural change and bringing its values to life**.**

4.5) **Commit to completing all disciplinary proceedings**, even if a person resigns, to ensure accountability to survivors and promote organisational learning. Ensure a documented trail for future job references. Questions around the organisational culture that allowed this abuse to happen should include: how did we get to a position where this was possible and what do we do to reduce the likelihood of this happening again?

4.6) **Use international reporting protocols for expatriate perpetrators** and hold them to account through the legal systems available to them in their home countries (UK citizens, for example, can be prosecuted in the UK for sex/rape of minors in another country).

5. Ensure concerns are heard and acted upon - full accountability through reporting and complaints mechanisms (working group 4)

Identifying abuse

5.1) **Value women's knowledge and experience**; simpler reporting mechanisms are needed grounded in an understanding of how survivors disclose (slowly, hesitantly, indirectly), recognising the priority of safety. Encourage 'cause for concern' reporting to document women's private knowledge, and collate a wider picture of abusing behaviour without needing an 'incident' for investigation. Encourage women and girls to share their unease.

5.2) **Look for new forms of evidence.** Challenge the need for 'watertight, indisputable evidence' and look for other forms of evidence, including consistent reports of 'causes for concern'. Encourage, enable and reward the reporting of 'causes for concern' as indicative of potential deeper issues; Use issues such as pornography on work computers, for example, as representative of a culture of sexualised inequality and respond seriously; this is at the least contributing to a hostile work environment and should not be underestimated. Build honest and respectful relationships with and resource women's rights organisations to share information of contexts that need investigation.

5.3) **Look at ways to do contextual safeguarding** based in collecting data through good relationships with women's rights and children's rights organisations, response services, and women's community groups. Using this information well will move away from a reliance on individual 'incidents' and individual complaints for investigation; taking seriously the information provided in aggregate from women's groups provides the direction for where to look more closely and where to intervene to ensure that women and girls are 'safe to' to participate in programmes and/or to sustain their employment within the organisation

5.4) **Develop processes and media protocols on speaking out** to support women who have been failed by organisations, including mechanisms of support ensuring these provisions extend to women based in the global south.

Response

5.5) **Use survivor-focussed Standard Operating Procedures (SOPs)** to collect and share data on perpetrators and allow for joint/collective reporting, rather than relying on individual, separated complaints. Include aggregated 'cause for concern' reports as the basis of precipitating action.

5.6) **Provide survivor-centred support** to ensure that a survivor is not re-victimised for example by having to repeat their story multiple times. This would include measures to: provide access to confidential, independent medical and psycho-social support; integrate safety planning; broaden the definition of 'justice' for survivors; and track outcomes of reports. Organisations should also resource access to independent legal advice and advocacy for survivors making a complaint through criminal justice systems.

5.7) Recognise that poor organisational responses compound trauma; confidentiality, safety, dignity and respect need to be the central principles of response. Treat breaches of confidentiality as an act of serious misconduct. Ensure that organisations hold and uphold the responsibility for timely response and action, and for sharing information with survivors, including outcomes of internal actions and processes. Where girls and boys are concerned ensure responses are 'in the best interests of the child.

5.8) Support a survivor to sustain their employment, and support wider options; do not presume they will not be able to continue working. Offer options, be led by a survivor's actions in their own best interests, including offering alternative positions where appropriate.

5.9) Recognise the difficulties of whistle-blowing (aligned to the recognition that perpetrators abuse 'downwards' for precisely this reason, and the centrality of power in this dynamic), and provide support from the same principles; confidentiality, safety, dignity. Take seriously the potential for retaliation, threat, and ostracism, and apply the same principles as supporting a survivor, including access to independent advocacy services.

5.10) Use language carefully; use case management principles and name what is happening accurately in relation to race, gender, class, sexual assault, sexual abuse and whether the survivor of the alleged abuse is an adult or a child. Train all staff in active listening, appropriate responses, and in appropriate language. Capture data accurately and systematically.

5.11) Have clear country office positions on the involvement of national legal systems; women and girls will not report if they fear they will face potential prosecution or public punishment for reporting. Country office positions should be informed and guided by women's rights experts and recognise that legal systems are not gender-neutral. It may not be safe or appropriate for survivors to report if legal systems do not support them. Decisions about whether to make a legal complaint in country needs to rest with a survivor, and be informed by their assessment of their safety. Organisations should not rely on formal justice systems as a mechanism of response.

For more information please email: Coordinator@gadnetwork.org
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