

Private Sector written statement submitted to the International Development Committee for evidence session on 7th May 2019.

Prepared by the private sector representatives on the Cross-Sector Safeguarding Steering Group.

Introduction

This written statement serves as an account of the work undertaken by the private sector representatives on the steering group of the International Safeguarding Summit during the months before the Summit, activities undertaken since the Summit and what the newly formed Safeguarding Leads Network aims to do in the future.

Lead-up to the Summit

Invitation to sit on the steering group for the Summit

In the summer of 2018, IMC Worldwide Limited (IMC) and Oxford Policy Management Limited (OPM) were invited to be part of the steering group for the International Safeguarding Summit as representatives for the private sector.

In August 2018, IMC and OPM attended the first steering group meeting in the preparation for the Summit and received, via a Terms of Reference, instruction relating to the production of a Commitment Document. The Commitment Document for the private sector was to be prepared and submitted before the Summit in October 2018.

A commitment document in the context of the private sector

During the steering group meetings, the private sector representatives sought clarity on what a commitment document meant in the context of the private sector. It was raised that sector **already has a mechanism for reform across various topic areas including safeguarding**. The DFID Code of Conduct has been in place since 2017 and was updated in August 2018 to explicitly include safeguarding although in previous versions safeguarding considerations were implicit in compliance areas relating to ethical risks and risk mitigation.

It was also raised that as the private sector does **not have an industry body with a membership charter**, it was going to be challenging for IMC and OPM in their capacity on the steering group to develop a document that all suppliers would agree to adhere to. Time constraints also presented a further challenge – the Summit was in two months' time.

It is worth noting that IMC and OPM volunteered to sit on the steering group and **were not nominated by other suppliers to represent the sector**.

After discussion with the steering group and with the DFID Safeguarding Unit, the private sector representatives proceeded with the development of the commitment document on the basis of the following:

- That suppliers **would not be called to sign up** to the Commitment Document.
- The document **did not replace the requirements in the DFID Terms and Conditions or the Code of Conduct**.

- The Summit presented an opportunity to share a document that could **usefully serve as a guidance for suppliers** looking to strengthen or improve safeguarding provisions in their respective organisations.
- Under each strategic shift the document would provide a number of **suggested commitments**.
- Against each commitment the document would provide **example actions** that could be taken to progress each commitment.

To quote from the Commitment Document –

“This document was prepared ahead of the DFID Summit (18 October 2018). The following commitments have been suggested by the private sector representatives on the Summit Steering Group, following consultation with representation from DFID’s top 30 suppliers, across the supply chain and other networks. Some example actions have been included here to illustrate initiatives that might be taken under each commitment – these are by no means exhaustive or mandatory.”

The document prepared was titled a Commitment Document to be in line with the other documents presented at the Summit from the other sector groups.

The commitments made by each sector on the steering group were to centre around a shared policy agenda in the form of **four strategic shifts**. These are:

1. Ensure **support for survivors**, victims and whistle-blowers; enhance accountability and transparency; strengthen reporting; and tackle impunity.
2. Incentivise **cultural change** through strong leadership, organisational accountability and better human resource processes.
3. Adopt **minimum standards** and ensure we and our partners meet them.
4. Strengthen **organisational capacity and capability** across the international aid sector, including building the capability of implementing partners to meet the minimum standards.

Developing the Commitment Document

In September 2018, IMC and OPM worked with British Expertise International (BEI) and the Centre for Development Results (CDR) to **gather together private sector suppliers to attend a workshop** (19th September 2018) to discuss an initial draft of the Commitment Document. DFID attended the first session in the workshop and gave a useful update to the room from the Safeguarding Unit and the Summit team. The remaining time was spent discussing the strategic shifts and the draft suggested commitments. The group also discussed example actions that could be included in the Commitment Document to give each commitment more substance and another level of detail.

It was discussed that there are other mechanisms for the sector to comply to safeguarding standards and that the document prepared for the Summit, as agreed by the Steering Group, would instead be an additional resource for organisations looking to strengthen or improve their safeguarding provisions. Acknowledging that there are other mechanisms for suppliers to comply to Safeguarding requirements and that the DFID terms and conditions include a firm contractual commitment to meet minimum safeguarding standards it was **not proposed that private sector organisations would be asked to sign up to the private sector commitment document**.

After an update of the initial draft of the document, feeding in comments from the workshop, a number of organisations opted to give written feedback on the commitments and example actions. The draft final document was submitted to DFID for their review and finalised prior to the Summit.

During the Summit, OPM and IMC presented the process that the private sector had undertaken to prepare the Commitment Document and announced that private sector organisations would be meeting again six months’ time.

The Commitment Document was then hosted on the DFID website shortly after the Summit.

| Suppliers invited to participate in the workshop | Suppliers in attendance | Suppliers invited to the Summit | Suppliers at the Summit |
|--|-------------------------|---------------------------------|-------------------------|
| 70+ | 19 | 27 | 21 |

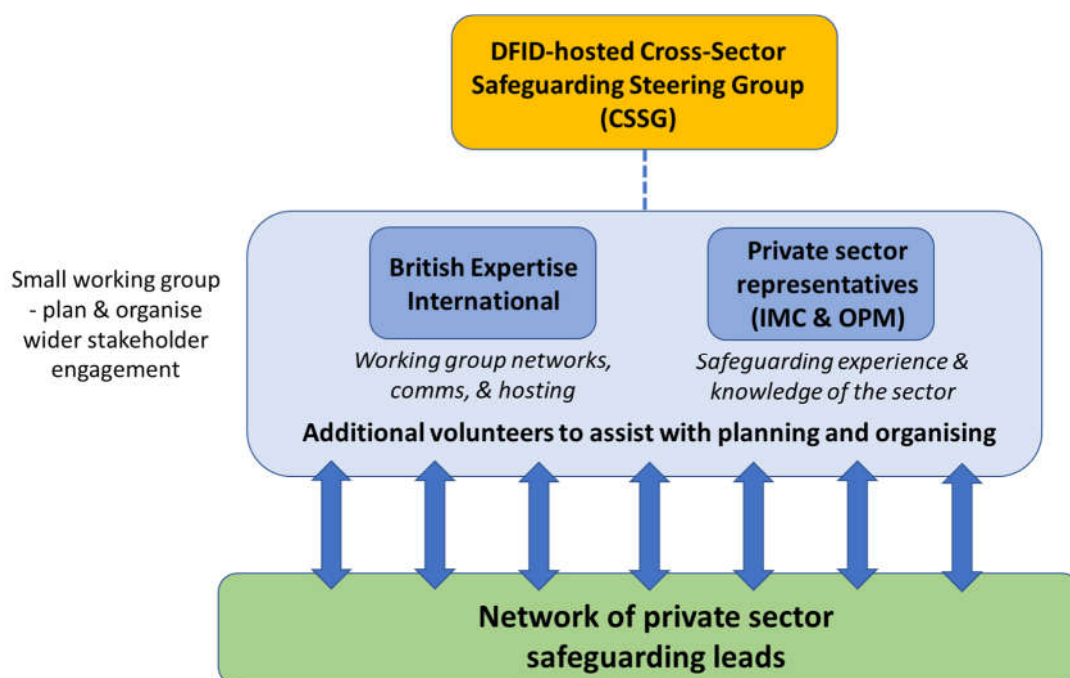
Since the Summit

The DFID-hosted Cross-Sector Safeguarding Steering Group (CSSG)

During the follow-up Summit steering group meeting, six weeks after the Summit, it was first discussed what could be done in the form of a light touch process for tracking progress made and the value in the group continuing to meet. It was agreed that continuing to meet would be beneficial in driving forward safeguarding reform. The group would continue to meet with a refreshed Terms of Reference and is now named the Cross-Sector Safeguarding Steering Group (CSSG).

Private sector working group

Since the Summit, IMC and OPM have continued their involvement on the CSSG but now have teamed up formally with BEI as a representative of the sector. Although the CDR had assisted in the lead up to the Summit and is mentioned in the Commitment Document, the organisation no longer exists and will not be contributing to work in this area. The small reaffirmed private sector working group discussed what needed to be done to arrange a six-month check-in with the sector and how it might serve the sector moving forward in this area. The structure of the group and its interaction with the sector and CSSG is illustrated below:



Establishing the Safeguarding Leads Network

Following positive feedback from the workshop in September 2018, the working group discussed the value in forming a network of safeguarding professionals. It is thought that contributions to the Commitment Document prior to the Summit were **limited by the representatives' ability to effectively communicate with organisations and access the right contacts within these organisations** (mailing lists were based on BEI membership and the representatives' professional networks).

Therefore, the first steps in taking any private sector work forward was to **create a network of safeguarding professionals or leads in the private sector**. This involved reaching out to private sector suppliers and asking for the details of their most appropriate contact that was responsible for safeguarding. Once these contact details had been gathered (primary and secondary contacts were requested) the working group were able to send a targeted invite to join the Safeguarding Leads Network.

The first Safeguarding Leads Network meeting

The first meeting was held on **1st May in London at the BEI offices** (approximately six months on from the Summit) and the agenda covered the following:

1. What has happened since the summit? Update from DFID, BOND and UKCDR
2. Private sector representation on CSSG and the Safeguarding Lead Network.
3. Open discussion around work to date/challenges/ barriers to progress
4. Discussion around value and approach to demonstrating progress against the commitments or strategic shifts.
5. What's next for the Safeguarding Lead Network?

The working group invited and was pleased to have input from **DFID Safeguarding unit and DFID PCD** at the event. Representatives from **BOND** and **UKCDR** attended by invitation and presented to the group an update on their work since the Summit. This supports the shared view that there is much to gain from working across the different sectors in this space as well as meeting as a sector group.

Safeguarding progress made by the private sector

There have been various calls to action for the sector over the last year. **DFID has been the main driver of the safeguarding improvements for many suppliers.**

The private sector Commitment Document can be mapped onto the DFID code of conduct. **Suppliers are working to the Code of Conduct or using other reference material to influence their safeguarding work** – very few suppliers at the Safeguarding Leads Network have been using the Commitment Document to shape their work. This might be indicative of the organisations participating in the Network and the maturity of their safeguarding provisions within their organisations.

It was clear from the discussion that **suppliers are not neglecting the issue of safeguarding**. Some shared that the Summit had opened a door to having conversations with partners. It was clear from the discussion at the Network meeting that there are different levels on which suppliers are tackling

this issue. Some are focusing on policies and procedures – particularly around reporting. Other organisations have prioritised high-risk projects and focused on making sure that context-appropriate procedures are in place at the local level. Although not discussed in detail, it is clear that some organisations have to take a decision on how to best apply the resources that they have available – perhaps breaking down the requirements into an action plan to be tackled incrementally. Cognisance of the resource limitations of some small/micro sized company should be taken into account and it is recommended that DFID considers ways of providing sufficient support/resources to these organisations in the same way support is being offered to NGOs through BOND.

It is worth stating that the DFID Code of Conduct, that many suppliers work to, calls for the following:

- Organisational procedures to prevent actual, attempted or threatened sexual exploitation and abuse
- Procedures for reporting within organisations
- Evidence of how suppliers cascade safeguarding messages to employees, partners and consultants
- Organisational procedures for ensuring partners are doing the same

The discussion at the Network meeting around progress can be broken down into the following areas:

Policies

Suppliers described work that had been done around reviewing, updating and aligning relevant policies relating to safeguarding including whistleblowing and codes of conduct. Many suppliers have also sought to provide guidance documentation to their employees on living those policies and what they mean in terms of the work that they do on the ground.

Governance

Suppliers spoke about identifying and training leads, focal points and responsible board directors at different organisational levels. It was also shared that some suppliers have established committees for responding to reports as they arise with established roles and responsibilities.

Risk Management

At a project team level, suppliers are supporting their teams to take a risk-based approach to assessing and analysing safeguarding risk including a focus on supply partners. Taking this approach is encouraging teams to develop appropriate risk management measures for project activities and safeguarding action plans that are to be implemented.

Suppliers described positive working relationships with DFID field teams – open and constructive conversations about safeguarding challenges on projects and how to tackle them collaboratively.

Recruitment

Many suppliers have strengthened their recruitment processes for permanent employees and independent consultants. This has included bolstered due diligence with some suppliers undertaking enhanced checks with roles involving direct engagement with beneficiary communities, particularly children or vulnerable adults (e.g. DBS checks).

Training and awareness raising

How suppliers chose to engage with their employees around safeguarding seems to vary – with some opting for online training which can be shared widely and others opting for face to face training - tailored to specific contextual challenges. Some suppliers are in a position to take both approaches.

Some suppliers spoke about the establishment of training packages that are issued to project teams for tailoring and roll-out. The group was in agreement about the importance of addressing contextual challenges and adapting messages for the intended audience.

Support to subcontractors

Various suppliers spoke about working with partners or subcontractors. Managing safeguarding risks on projects includes the activities of the supply chain. It seemed that the Code of Conduct and the Summit are assisting in having early conversations with partners around safeguarding challenges and working collaboratively in strengthening safeguarding across the supply chain.

Key challenges discussed at the Network meeting

Partnerships and the supply chain

The level of capacity and resource for safeguarding varies substantially between organisations, especially within national partner organisations who perhaps operate in contexts where safeguarding or whistleblowing are not necessarily commonly used terms. Where there are complex consortia on projects, this can be challenging in applying a consistent approach to safeguarding and developing effective complaints mechanisms. **Suppliers expressed that opportunities to exchange learning and best practice on approaches across stakeholders would be welcome in this area.**

Balancing top-down approaches and bottom-up learning

The suppliers discussed the importance of leadership in organisations so that safeguarding work goes beyond box ticking, policies and procedures but also that there are dangers in a UK-centric approach excluding the valuable contributions from those both implementing projects on the ground and the voices of those communities that safeguarding measures are looking to protect.

Lack of evidence of what works

The group discussed evidence of effective safeguarding measures - whilst there is best practice and guidance available on safeguarding, there is a lack of evidence to illustrate what practices have proven effective on the ground particularly in terms of engagement with communities, reporting and response. **In the future the Safeguarding Leads Network might offer an opportunity to discuss experiences to date.**

To this point, the suppliers requested feedback from DFID on safeguarding solutions outlined in tender bids and whether their proposals are effective or whether there is more that they can do.

Sharing information - across the sector

There are various safeguarding initiatives underway in other areas that the private sector could benefit from and indeed feed into, for example work being resourced/funded by DFID for NGOs through BOND. There is a strong feeling that as actors in the aid sector (delivering similar work or working together) creating silos between the private sector, NGOs and other stakeholders is not helpful and could be counter-productive. The Safeguarding Leads Network where possible will build

relationships with NGOs (through BOND), Research institutions (through UKCDR) and other stakeholders where possible but more thought needs to be given to cross-working and knowledge sharing beyond sharing tools or reports. **BOND was open to this at the Safeguarding Leads Network and will pick this up with BEI directly.**

Sharing information – between organisations

It is very common for suppliers to use independent consultants or freelance workers for project teams. A very recent safeguarding conviction that was in the media this week has posed lots of questions around the mechanisms for and challenges around sharing information about independent consultants between suppliers and between DFID and suppliers. **There is further discussion to be had on this and it will be helpful to use this example to map out what more can be done in the future (taking into account legal obligations including data protection).**

Applying safeguarding measures retrospectively

Suppliers made reference to the challenges in retrospectively applying safeguarding measures to programmes already running and noted that it was much easier to embed good practices on new projects and in new contractual relationships with partners.

Looking forward – the role of the Safeguarding Leads Network

After an encouraging level of attendance at the first meeting and productive, constructive discussion, the group made the decision that there would be value in the Safeguarding Lead Network continuing to meet.

The group is currently sharing ideas about the objectives of the Network and how often it will be convened in order to support those objectives.

The small working group will continue to provide the link between the CSSG and the Safeguarding Lead Network as well as, where possible promoting the Network so as to attract new members. The working group will continue to work closely with the DFID points of contact in the Safeguarding Unit and PCD, who can provide support and guidance to suppliers. DFID will also be sign-posting suppliers to the Network during their compliance work with organisations.

| Suppliers in the Safeguarding Leads Network | Representing % of DFID spend | Suppliers in attendance on 1st May |
|--|-------------------------------------|--|
| 30 suppliers | 63% | 23 suppliers |

30 suppliers in Network are not necessarily DFID top 30 suppliers. Numbers correct as of 1st May 2019

For more information about the Safeguarding Leads Network and joining the Network please contact:

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