Scotland's International
Development Alliance

INTERNATIONAL DEVELOPMENT

SAFEGUARDING SUPPORT PROJECT

Research Findings

Executive Summary

Anna Ross and Philippa Ramsden

October 2018

EXECUTIVE SUMMARY

This report provides the analysis of a small research project conducted by the Scottish Government and Scotland's International Development Alliance with stakeholders in the international development sector.

Policy context

> *"The Scottish Government expects the highest moral and ethical standards from those we fund to provide services to those people and communities who look to our support at their time of greatest need. Both the international development sector and the humanitarian sector involve working with particularly vulnerable groups of people. We are clear that beneficiaries must always be put first, by the Scottish Government itself and by its partners.*
>
> *We will not tolerate any form of human rights abuses or misconduct, wherever they take place. We are committed to a culture of zero tolerance to sexual exploitation and abuse in all that we do, and where we are involved in funding organisations involved in delivering international development or humanitarian aid, to supporting them, providing a proper framework, and holding them to account in order to achieve those objectives."*
>
> *(Scottish Government Safeguarding Policy Statement)*

In response to the press coverage of historic safeguarding incidents which were reported widely from 10 February 2018 onwards, the Minister for International Development serving at the time wrote to all Scottish Government grant holders requiring them to confirm that: they had robust safeguarding policies in place to protect vulnerable groups; and, if they had become aware of specific incidents, that these had been referred to the relevant authorities where necessary. The Minister met with grant holders who had notified incidents to discuss their responses, including the processes they had since put in place to ensure reporting of safeguarding incidents. The Minister made it clear it was essential that any grant holder inform the Scottish Government where allegations of abuse are reported on projects funded by them.

In March 2018 the Scottish Government amended their grant conditions to make it explicit that grant holders must have robust safeguarding policies in place, and must notify any safeguarding incidents as well as any irregular financial activity. Furthermore, it is expected that all potential grant holders carry out due diligence on their in-country partners in regard to their safeguarding policies. Grant holders are expected to have at least reviewed in-country partner policies unless the grant is for development of policies. On 19 March 2018, the Scottish Government published a specific international development safeguarding policy statement, which sets out requirements of standards expected from grant holders. They stated they were committed to supporting the sector, in particular small organisations, in helping them develop robust safeguarding policies.

As part of that ongoing commitment, in May 2018 The Scottish Government committed resources for a six-month project in order to identify capacity needs and develop a safeguarding support package. Scotland's International Development Alliance (The Alliance) were funded to employ a six-month part

time safeguarding lead – Philippa Ramsden, and an SGSSS intern was brought in to work with the Scottish Government- Anna Ross.

Anna Ross's role was twofold: she worked solely for Scottish Government International Development Team (ID team), assessing the safeguarding policies which they received and sending feedback in the form of RAG (red, amber and green) assessments; and secondly with Philippa Ramsden in the development of the safeguarding survey, interviews and a safeguarding package of support.

Research Findings

Below are the top findings of our research with recommendations and/or discussion. Deeper findings and analysis can be found in the full report.

Overall Comments

- Developing a robust safeguarding environment is akin to the journey of developing a culture of health and safety. It will take time, persistence and consistent application of policies and processes but will result in a change of organisational and institutional culture.
- The Scottish Government is delivering its international development obligations primarily through the grant holders, therefore partnership and accountability is influenced by a complex power dynamic. Therefore, it is crucial to develop a healthy safeguarding culture, and robust organisational processes and procedures.
- It is important that the Scottish Government is well equipped to deal with ad hoc enquiries, FOI requests and anticipated critical media and public comments when there are increased reports of incidents.
- There is a challenge in aligning the reality, complexity and practicality of implementing international development projects with due diligence and compliance requirements which have been developed from a donor perspective. Meaningful, clearly owned in-country policies, which are influenced by good practice and high standards should be developed through a respectful, reciprocal process rather than imposition of culturally different or inappropriate standards and concepts.

- It is recognised that there are a number of institutional and cultural practices that exist in the contexts where partners are working. For example, unacceptability of practices such as child marriage, child labour, initiation ceremonies and harmful punishment in schools are widespread in a number countries. Where issues arise within a project, they should be addressed directly. Broader advocacy and awareness raising should be seen as an important tool to address them systemically by those in receipt of Scottish Government funds.

Challenges with Implementing Policies

THEME	FINDINGS	RECOMMENDATIONS AND DISCUSSION

Realism in policy development	The Scottish Government is delivering their international development programmes through the grant holders, therefore partnership and accountability goes both ways. Grant holders need to have clarity on the shared objectives and how they will be measured.	Clarity on what is expected (ex: Scottish Government's original letter in February asked for clarification, not actual policies, but the expectation was policies – this was subsequently followed up by the Scottish Government with requests for the policies). On the other hand very good feedback on how the Scottish Government have responded to safeguarding.
	There is a perception that funders and donors lack understanding of the reality and practicality of international development implementation. There is a need to influence without imposing, and this takes time.	Continue with stakeholder engagement and explicit recognition by Scottish Ministers/civil service that the challenges of working in-country are recognised.
	There is a tension between the due diligence need for a suite of safeguarding policies versus the process required to develop meaningful and clearly owned in-country policies and procedures. Meaningful processes are critical to the ownership and sustainability of the project, maintaining and strengthening healthy relationships between stakeholders, and creating meaningful change for the safety and wellbeing of beneficiaries.	Building safeguarding policy development into capacity building (currently being done via the small grants) and advice organisations on how to develop meaningful policies.
Cultural Challenges	In the UK traditional governance structures of NGOs means there is a diversity of skills, experience and understanding of international development within trustees. This is compounded by a range of governance structures from very loose, to very formal.	Training for all Scottish based staff, volunteers and board members. Scottish Government led on safeguarding to make it a top down priority.
	In-country there are a variety of complex cultural differences that create challenges for implementing safeguarding policies and procedures.	See in depth discussion on this. The main recommendation is making sure policies are developed in-country with partners and beneficiaries in order to ensure **ownership** by communities.

		One way of exploring these cultural differences is to work through existing structures. For example, in Malawi there is the Malawi Scotland Partnership (MaSP).
Translatable policies	Policies which are adopted because they have been imposed are unlikely to be properly understood and implemented effectively.	Meaningful development of policies by in-country partners and community that takes is based on analysis of context, language and culture The establishment of clear reporting processes.
	It is challenging to arrive at a shared understanding of concepts such as 'safeguarding' and 'due diligence'.	Staff/partners/community have a rolling programme of orientation and refreshment and agreed definitions are in place.
Lack of control over policy development	In-country partners and affiliated bodies do not have motivation or confidence to report incidences because of potential repercussions such as: ● the loss of grant funding, ● police and local authority corruption ● community kickback Lack of ownership leads to lack of control.	Process led by in-country partner and community. This encourages ownership and in-country monitoring.
	Language issues (translation), conceptual differences in understanding and definition, physical distance, communications such as internet and mobile phone connectivity etc. In-country partners are sometimes not responsive to the grant holder (Scotland based) as they are only one of a number of donors.	Investment with time and money in contextualisation and translation, and tools. Budgeting for more visits and building policy development into grant applications. It is difficult to impose policies on institutional in-country partners such as the Church, hospitals, universities and other large national institutions. Recognition of this by the funder would help build trust and healthy relationships

	between the funder and the grant holders.

Suggestions for Support

THEME	FINDING
Policy and procedural development	All organisations suggested support for the development of policies, particularly for smaller organisations and private companies. This support must include development of clear reporting procedures, and on-going training in safeguarding within organisations. As good practice in safeguarding requires that a holistic system and culture be established, it is important to ensure that policies can be effectively translated into practice. With this in mind, it could be beneficial for organisations to be supported in the production of implementation and development plans tailored to their own contexts. Funding to meet the costs of improving and strengthening smaller organisations' safeguarding policies can be accessed via the Scottish Government's Small Grants Programme – this Programme is specifically aimed at smaller organisations. Under the programme, project grants of up to £60,000 are available for up to a three-year period; however, capacity building grants of up to £10,000 for up to one year are also available, and these can be used by smaller organisations to build their safeguarding policies and practices as well as other improvements to their governance.
Clarity	Clarity on the due diligence and reporting requirements from the Scottish Government. Clarity on what policies are needed to fulfil the requirement of a broader safeguarding organisational culture. Clarity on best practice.
Capacity	Recognition that there are different levels of capacity in organisations, and collaboration in the development of policies would be welcomed. The Scottish Government are encouraging grant holders, in particular small organisations, to apply for capacity building grants to develop safeguarding policies in the 2018/19 small grants funding round.
Collaboration	Concerns around duplication of effort were expressed. Creating space for innovative collaborations, with a recognition that these may entail higher risks and greater capacity building by funders. **A national hotline or whistleblowing line to log safeguarding concerns, but also act as an information sharing point in regards referencing/disciplinary actions**

	etc. It is not clear yet whether this hotline would be national or international, for specific safeguarding incidents or all concerns, but discussions are ongoing between OSCR, SCVO, The Alliance and the Scottish Government on how to proceed with this recommendation.
PVG guidance	Better guidance on how to use the PVG and Disclosure scheme would be helpful. Clarity on the use of PVG for international organisations and staff deployed to work overseas
Simple policies	A simplified version of safeguarding policies and procedures that overcomes language barriers – potentially an infographic. How to translate policy language for partners – the way we write policies does not translate well. Policies are deliberately unspecific in order to address wide ranging scenarios. However, there is a desire to have more explicit content relevant to the organisations, which spell out exactly what kind of behaviour constitutes reportable safeguarding incidents.
Templates	Templates with process notes would be very helpful.
Training	Training for all staff, volunteers and board members on safeguarding and associated policies and their implementation. Clear reporting mechanisms and lines of responsibility in particular would be good. In particular Trustees should have more training, have a designated safeguarding officer, and have safeguarding as a standing item as first steps.

Feedback and Discussion

Theme	Finding
Engagement	Overall there was very positive feedback regarding the Scottish Government International Development team's commitment to engaging stakeholders. Putting aside the safeguarding issue, in general stakeholders feel that the team are easy to approach, that there is a level of engagement with the sector not seen in other sectors, or UKG/DFID engagement, and a desire to see grant holders - in particular small grant holders - supported in their development. Regarding safeguarding in particular it was expressed that the initial engagement with stakeholders was sometimes lacking in understanding as to the pressures on organisations at that time, particularly smaller organisations, and communication on what was expected from the grant holders was not carried out as well as it could have been (see Communication below). However, all interview respondents expressed appreciation that the Scottish Government are taking the issue seriously, and were grateful to have the opportunity to feed into policy development and support.
Power dynamic	Funders are in a position of power which carries the potential for abuse, as can be seen throughout the sector. Abuse is mainly psychological. It can start with the main funder, and pass along a chain through the grant holders and on to in-country partners and project beneficiaries. Beneficiaries (grant holders, in-country partners and project beneficiaries) will agree to things in order to secure funding which they might not otherwise agree to if not tied to a funding consideration. Care needs to be taken

| | therefore in developing and managing relationships at each stage of the grant making process.

Although the focus of safeguarding is often on children and vulnerable adults, bullying and harassment in the workplace is a concern and part of the broader challenges in ensuring a safeguarding organisational culture. |
|---|---|
| **Communication** | Overall there was very positive feedback regarding the Scottish Government International Development team's communication with stakeholders.

Feedback from both the survey and the interviews highlighted that stakeholders felt the communication from the Scottish Government in regards to safeguarding policies had been unclear. In particular, it was felt that the reactive nature of the communication resulted in frequent emails, perceived unrealistic demands, and a lack of clarification on what was expected of both the sector and the Government. |
| **From Scottish Government** | As soon as the media reports of sexual abuse and exploitation in the international development/humanitarian sector arose in February, and public confidence in the sector was challenged, The Scottish Government expected that organisations would realise that this would require urgent attention by all. There was a concern by Scottish Government colleagues that some organisations did not fully understand the importance and urgency to protect beneficiaries, restore public confidence and enable the Scottish Government to process agreed grant funding to organisations.

The Scottish Government recognised that the majority of grant holders responded promptly, and going forward all grant holders engaged with the process of policy evaluation and collaboration in the safeguarding support project. |

Conclusion/Way forward

The research findings have identified key areas to strengthen capacity of organisations in safeguarding, and the feedback has shaped the Safeguarding Support Package. A number of the resources and elements in the packages, and the guidance are based directly on feedback and suggestions from the survey respondents.

Safeguarding Support Package

"Developing culturally appropriate guidelines in situ for projects delivered abroad that are not jargon heavy and legalistic but more about the values and appropriate behaviour expected of anyone, including the beneficiaries, would be helpful. For a small community led voluntary

project, promoting and encouraging the values we subscribe to is a better investment than only having Westernised compliance and safeguarding documents."

(Survey Respondent)"

The package is developed from on the findings from research conducted by Anna Ross and Philippa Ramsden. The package is presented in a different document.

'The Safeguarding Package' will evolve over time to comprise a suite of tools including templates, guidance, access to training and advice, and on-going monitoring. On-going training and monitoring is essential if a robust safeguarding culture is to be developed. This suite of resources will be owned and managed by The Alliance, with support from the Scottish Government.