



# NGO collection and reporting of data on sexual exploitation, abuse and harassment

*Jenny Birchall*  
*Independent researcher*  
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## Question

*What evidence is there about the collection and reporting (and the systems/processes used) of data on sexual exploitation, abuse and harassment (SEAH) within civil society organisations and NGOs? When/where possible, please indicate what parameters are used in collection and/or reporting SEAH data.*

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## 1. Summary

While since 2018 the importance of greater transparency and consistency in the collection and reporting of data on sexual exploitation, abuse and harassment (SEAH) across the aid sector has been increasingly recognised, evidence on how this data is being collected and analysed by NGOs and CSOs is not readily available. While some organisations have begun to make public top line information about SEAH complaints received and dealt with, others do not report at all.

Available evidence, and the input of experts consulted in the preparation of this report, suggests that there is no common method used for SEAH data collection within NGOs and CSOs, and nor is there a central repository for data. This helpdesk report looks at publicly available data on SEAH from a sample of organisations that included the data in their 2018-19 annual or accountability reports. Organisations in the sample tended to refer to the use of standardised frameworks for reporting, but in their annual and accountability reports they did not include meaningful information on specific procedures and parameters for collecting data on SEAH. The data reported by this sample illustrate a lack of consistency across different organisations' public reporting, and an absence of disaggregation of publicly available data. It is difficult and inadvisable to make comparisons between the public data of the organisations in the sample, because they all use different definitions and types of data in their reporting.

It is well known that violence against women and girls is under-reported all around the world for a range of reasons, including imbalances of power and fear of retaliation, stigmatisation or further repercussion. These factors impact significantly on reporting of SEAH, and affect all survivors to some degree, whether they are recipients of humanitarian aid or staff or volunteers in aid agencies. Inconsistencies in how data are collected, collated and reported exacerbate under-reporting and prevent understanding of the extent of the problem and the best ways to tackle it.

Given the focus recently placed on more transparent public reporting on SEAH, including recommendations from the House of Commons International Development Committee inquiry on sexual exploitation and abuse in the aid sector, it is possible that reporting could be more prevalent and more detailed in organisations' forthcoming annual reports for 2019-20.

## 2. Background

Over the last two years, and particularly since the London Safeguarding Summit in October 2018, actors across international development and humanitarian fields have placed increasing importance on tackling sexual exploitation, abuse and harassment (SEAH), and considerable effort has been put into the development of guidance, policies and reporting mechanisms. Improving collection and reporting of data on SEAH is considered to be essential in promoting accountability and transparency, to improve responses and to inform prevention.

The Charity Commission reports that in 2018-19, it received 2,504 reports of safeguarding incidents, up from 1,580 the previous year (Charity Commission, 2019, p. 16). The final report of the Charity Commission's safeguarding taskforce, published in October 2018, noted that during February and March 2018, following the emergence of safeguarding concerns at Oxfam GB, the commission received three times as many reports of safeguarding incidents compared to the same period in 2017 (Charity Commission, 2018, p. 3). At the same time, the taskforce's 'deep dive' into historic reports between 2014 and 2018 found that only 0.9 percent of registered charities submitted a report of a serious safeguarding incident during this period (Charity Commission, 2018, p. 7).

Also in 2018, the International Development Committee (IDC) published the findings of its inquiry into sexual exploitation and abuse in the aid sector. It noted that "due to confirmed under-reporting, the exact scale is currently impossible to define [...] Improving reporting of sexual exploitation and abuse is vital to understanding the problem, responding to it, and ultimately, to preventing it. Aid organisations and donors must consider this an absolute priority" (IDC, 2018, p. 5). In 2019 the IDC published its follow up report, in which it noted its disappointment that "some organisations still seem reluctant to publish information about the number of allegations they have received and the outcome" (IDC, 2019, p. 4).

In July 2019, the OECD DAC recommendation on ending sexual exploitation, abuse and harassment in development co-operation and humanitarian assistance was signed by 30 major donors. One of the actions that adherents should take is to "develop reporting and response protocols, with clear guidelines for staff on when and to whom to report, and how to respond in a confidential, survivor- and victim-centred and ethically-sensitive manner" (OECD DAC, 2019, online).

It is well known that violence against women and girls is under-reported all around the world for a range of reasons, including fear of retaliation, stigmatisation or further repercussion (UN Secretary General, 2017). These factors impact significantly on reporting of SEAH, and affect all survivors to some degree, whether they are recipients of humanitarian aid or staff or volunteers in aid agencies (Norbert, 2017).

Recent studies have drawn attention to weaknesses in existing reporting mechanisms, which further decrease the likelihood of survivors reporting SEAH. One review of evidence on non-digital reporting complaints mechanisms found that there is limited evidence on the effectiveness of these mechanisms, especially in the context of lower and middle income countries (Schauerhammer, 2018). The Overseas Development Institute, in its evidence to the IDC inquiry into sexual exploitation and abuse in the aid sector, noted that accurate reporting cannot be done if mechanisms are controlled by the agencies to which the complaints would be lodged. It argued that "effective complaints mechanisms need to be designed and implemented in partnership with affected people to create an environment of trust and security" (ODI, 2018, p. 5).

### 3. How is SEAH data being collected by NGOs and CSOs?

As part of the evidence considered for this report, a sample of NGOs' annual reports and/or accountability reports for the years 2018-19 were reviewed.<sup>1</sup> The majority of reports contained a safeguarding section, which included a statement on the organisation's commitment to effective safeguarding and to handling complaints robustly. While some organisations included headline figures on numbers and types of SEAH complaints received during the year (see section four below for discussion of this), and refer to the use of standardised frameworks for reporting, annual and accountability reports do not tend to include meaningful information on specific procedures and parameters for collecting data on SEAH.

Recently conducted unpublished research for the global charity Elrha<sup>2</sup> identified a number of ways in which INGOs are collecting SEAH data, including:

- Qualitative research including staff and partner surveys, SEA self-assessments, case study development and research with communities and victims.
- Programme monitoring and accountability activities, including: entering details of SEA complaints into online databases; complaints received through other formal mechanisms such as hotlines; and verbal reports given to staff during face to face discussions. The database complaints may include demographic information on the complainant and the programme they relate to.
- Investigation reports, from which anonymised data may be shared internally and in some cases published in annual reports. This data may include the gender or age of the complainant if that is known.
- Community research and perceptions studies, which provide insights on preferences for reporting SEA and levels of trust in existing mechanisms, as well as perceived risks and barriers around reporting.
- Individual testimonies and case studies, which are used to strengthen understanding of SEA within agencies (Routley, unpublished, p. 26-29).

Available evidence, and the input of experts consulted in the preparation of this report, suggests that there is no common method for SEAH data collection from NGOs and CSOs, and nor is there a central repository for data. Bond, the UK network for organisations working in international development, has developed a toolkit to strengthen safeguarding report handling. Included in its '20 core elements of a safeguarding report handling mechanism' is the importance of a confidential system for recording and managing all reports, however data collection methodologies are not included in the parameters of the toolkit (Bond, 2019a).

There may be something to learn from the UN, which collects SEA data centrally through its iReport SEA Tracker tool and uses this data to report quarterly on all SEA allegations relating to staff at its agencies, funds and programmes. A standardised incident reporting form is used to

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<sup>1</sup> The NGOs selected for the sample are Bond network members and/or DEC agencies. It was not possible to look at all Bond members in the time available for this report. The inclusion of these particular organisations therefore represents an illustrative sample only. Organisations were selected on the basis of having publicly available information on safeguarding. A search was conducted of the organisations' websites, annual reports and accountability reports where produced.

<sup>2</sup> A UK-based global charity working in the humanitarian sector

ensure uniformity and consistency in information collection on allegations throughout the system (UN Secretary General, 2017). In addition, the UN Secretariat began in 2019 to use an electronic tool to report on internal SEA allegations related to UN agencies, funds and programmes. The UN Secretary General also reports publicly on the progress of the strategy to prevent and respond to sexual exploitation and abuse across the UN system (UN Secretary General, 2019).

Another system that may offer learning and insights on data collection is the Gender-Based Violence Information Management System (GBVIMS). The system is currently being used by UN agencies, NGOs, CSOs and government agencies in 20 countries worldwide, and it promotes standardised data collection on GBV. The GBVIMS includes: a GBV classification tool to enable uniform terminology and standardised classification of incidents; a standard intake and initial assessment form that allows for local and institutional customisation; an incident recorder database; and an information sharing protocol, which allows ethical sharing on GBV and best practice (GBVIMS Steering Committee, 2010). Evaluation of the GBVIMS found that it has contributed to safe and ethical collection, handling, analysis and sharing of GBV data, although there have at times been inconsistencies in its use. Data collected has been used to enhance learning and good practice on services for survivors of GBV and to better target prevention programming (ISG, 2014).

A broader, more holistic system for collecting data on SEAH was one of the recommendations coming out of a workshop on 'safeguarding and beyond' held by the UK Gender and Development Network in 2019. Workshop participants highlighted the persistence of reporting systems reliant on 'catastrophic incidents' or on individual survivors coming forward to report. Ideas were put forward for organisational systems and processes that move beyond documenting individual complaints towards safer, preventative and learning-based approaches that look more broadly at the contexts that enable abuse (Gender and Development Network, 2019, p. 10).

## **4. How is SEAH data being reported by NGOs and CSOs?**

DFID noted in 2019, that with the exception of the UN, "most stakeholder groups do not compile aggregate data on the number of SEAH incidents or reports" (DFID, 2019, p. 5). The report of the Charity Commission safeguarding taskforce notes that its 'deep dive' of reported safeguarding incidents between 2014 and 2018 revealed that some charities were under-reporting, while others were over-reporting. Where sufficient information was available, the Commission could see that charities were taking action to deal with primary sources of risk, but many reports did not contain sufficient detail, and incidents were not always reported in a timely manner. In addition, "there was rarely sufficient information to demonstrate that charities were considering, identifying and learning the wider lessons arising from an incident" (Charity Commission, 2018, p. 11).

The International Development Committee, in the 2019 follow up report to its inquiry into sexual exploitation and abuse in the aid sector, stated that progress around transparency on sexual exploitation and abuse remained slow, and that while there was consensus that organisations should be reporting information to donors and the Charity Commission about the number of allegations they have received and the outcomes, some organisations have been less willing than others to make this data public (IDC, 2019, p. 21).

Also in 2019, Bond set out 34 actions to improve the quality and consistency of its members' collective safeguarding practices. This includes an action to "standardise sector practice on

reporting safeguarding results to the Charity Commission and the public by implementing revised guidance on annual reports” and one to “track and report on changes to our policies and practices over time within organisations and explore means of monitoring sector progress as a whole” (Bond, 2019b, p. 7). This revised guidance and actions, if implemented, may help to address some of the issues identified by the Charity Commission taskforce and the IDC.

While the Charity Commission taskforce and the International Development Committee inquiry has drawn attention to the gaps in public reporting of SEAH data, it is difficult to find further, more detailed analysis of what the data that is available tell us. The unpublished study produced for Elrha was the only analysis found on this topic (Routley, unpublished). This study found significant inconsistencies in DEC agencies’ published data; some agencies report data at the UK agency level, on their UK websites and in annual reporting, others report at confederation level, on their international websites and within global reports, and some report at both of these levels (Routley, unpublished, p. 7). Routley notes that while the available data can provide an indication of scale, “the lack of consistency in the types of incidents that are reported and how incidents and charities are categorised makes comparisons and trend analysis difficult. Without further explanation, the data is not easily understood” (Routley, unpublished, p. 16).

This lack of consistency extends across different areas. Organisations’ definitions of ‘safeguarding’ vary, and many do not disaggregate by type of allegation or incident in their reporting. For example, some do not distinguish between incidents involving adult and child survivors; some do not separate out survivors who are staff members and those who are programme beneficiaries; and some do not specify if the perpetrator was a staff member or not. As Routley points out, some agencies also include in their reporting broader child protection issues in the communities in which they work (Routley, unpublished, p. 16).

Routley’s study points out that in addition to publicly reported data, some analysis of data on SEAH is undertaken internally by agencies for the purposes of learning and to strengthen practice (p. 20-21). However, the additional detail that this analysis provides is not usually shared externally (Routley, unpublished, p. 20-21, 33).

As part of the evidence considered for this report, a sample of NGOs’ annual reports and/or accountability reports, largely for the years 2018-19, were reviewed.<sup>3</sup> The majority of reports contained a safeguarding section, which included a statement on the organisation’s commitment to effective safeguarding and to handling complaints robustly. Some organisations included headline figures on numbers and types of SEAH complaints received during the year. Information on these organisations’ public reporting is included in table 1 below.

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<sup>3</sup> The NGOs selected for the sample are Bond network members and/or DEC agencies. It was not possible to look at all Bond members in the time available for this report. The inclusion of these particular organisations therefore represents an illustrative sample only. A search was conducted of the organisations’ websites, annual reports and accountability reports where produced. Organisations were selected for inclusion on the basis of having publicly available information on safeguarding and on reported incidents and complaints.

Table 1: Type of publicly available data by organisation

Organisation	Number of allegations	Type of allegation	Result/ response	Sex of survivor	Sex of perpetrator	Age of survivor (or if adult or child)	If survivor is staff, volunteer, partner or beneficiary	If perpetrator is staff, volunteer, partner or beneficiary	Region
<b>Action Against Hunger UK</b>	√	X	√	X	X	X	X	X	X
<b>Action Aid</b>	√	X	√	X	X	√	√	X	X
<b>British Red Cross</b>	√	√	X	X	X	√	X	X	X
<b>CAFOD</b>	√	√	√	X	X	X	√	√	X
<b>CARE International</b>	√	X	√	X	X	X	√	X	X
<b>Help Age International</b>	√	X	X	X	X	X	X	X	X
<b>Islamic Relief Worldwide</b>	√	X	√	X	X	X	√	√	X
<b>Oxfam GB</b>	√	X	√	X	X	X	X	X	X
<b>Plan International</b>	√	√	√	X	X	X	X	√	X
<b>Save the Children Association</b>	√	X	√	X	X	X	X	X	X
<b>Tearfund</b>	√	√	√	X	X	√	√	√	X
<b>Trocaire</b>	√	X	√	X	X	X	X	√	X
<b>VSO</b>	√	X	X	X	X	X	X	X	X
<b>WaterAid UK</b>	√	X	√	X	X	X	X	X	X
<b>World Vision</b>	√	√	√	X	X	√	√	√	X

Sources: Author's own, data taken from Action Against Hunger (2019), ActionAid (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), Trociare (2019), VSO (2019), WaterAid UK (2019), World Vision (2019)

Table 1 illustrates both the lack of data disaggregation in public reporting of SEAH data, and the lack of consistency across different organisations' reporting. It is difficult and inadvisable to make comparisons between the public data of the organisations in the sample, because they all use

different definitions and types of data in their reporting. In addition, some are reporting on global data while others are reporting data only related to the UK division of the organisation.

Some organisations report only on 'safeguarding incidents', while others split data into different categories such as sexual exploitation, sexual abuse, and sexual harassment. Some organisations also include complaints of bullying, abuse of power, or child protection incidents in the community in their reported data.

None of the organisations in the sample reported publicly on the sex of the survivor or the perpetrator. Age was not usually reported, except for some organisations that grouped complaints into those concerning adults or children. No information on region or location was included in reporting by this sample of organisations, and nor was information on disability or ethnicity.

The majority of organisations in the sample included information in their reporting about outcomes of investigations, such as, for example, dismissal or disciplinary action. However, no information was reported on outcomes for the survivor in each case, and information was not usually given on timescales for investigation, other than to say where cases are ongoing.

As the annual reports and accountability reports considered were largely for the financial year 2018-19, it is possible that, given the recommendations of the International Development Committee inquiry, and guidance from Bond, reporting could be more prevalent and more detailed in forthcoming reports for 2019-20.

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## About this report

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