ILEP Members’ Assembly
Brussels, 10th October 2018

Annex: 10 – Safeguarding update, 10.10.2018

Expected outcome of session:
Update on safeguarding principles and codes of conduct
ILEP and Safeguarding

Background
At the March 2018 Members’ Assembly there was discussion about what was happening in the various ILEP organisations around safeguarding policies. This was sparked by international aid scandals that were leading to more scrutiny of the aid sector and international NGOs. Geoff Prescott and Burkard Komm, supported by the CEO, were asked to follow up to see what ILEP Members had in place, look at what common practices there are, and share some good practice within the sector.

What is safeguarding?
Safeguarding means identifying and minimising the risk of harm to children and adults from staff, representatives and partners. For most organisations, this entails a framework of policies, procedures (including reporting) and activities that aim to ensure the safety and well-being of children and at-risk adults that we encounter in our programs and activities. Codes of conduct are generally included as an important element in the framework, but safeguarding is more than just codes of conduct.

These issues are important in the leprosy world. People affected by leprosy or living with disability may be vulnerable to major power differences, where exposure to abuse or harassment can develop. Safeguarding and protection of people we serve is important to us.

What the Member survey showed us
We asked Members to share safeguarding policies or codes of conduct. Responses were received from six Members.

The main takeaway from this short research is the amount of work done in this area this year. This is hardly surprising, as Government bodies in many countries are scrutinising what organisations have in place and are encouraging close attention to safeguarding. The six ILEP Members who replied all expressed renewed commitment to developing, updating or reaffirming their codes of conducts, with some putting in new policies and structures around this area.

- Codes of Conduct. All six Members either had or were in the process of developing their codes of conduct
- Designated Safeguarding Leads. Two reported having “Designated Safeguarding Leads” in place.
- Complaints mechanism. Three referred to an established complaints mechanism, others said this was in process.
- Commitment to the policies. Some had codes of conduct but a lack of training and follow-up. This was now being put in place. One Member is actively rolling out training in this area.

Good practice in the sector
It is not difficult to find examples of good practice in the international development sector. For example, UK agencies usually build their policy frameworks around the six key principles for safeguarding in UK legislation. These are relevant to children and to at-risk adults:

- Empowerment. People being supported and encouraged to make their own decisions and informed consent

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1 Damien Foundation, NLR, Lepra, DAHW, TLMI, Fairmed
- Prevention. It is better to take action before harm occurs
- Proportionality. The least intrusive response appropriate to the risk presented
- Protection. Support and representation for those in greatest need
- Partnership. Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse
- Accountability. Accountability and transparency in delivering safeguarding

One good example is Sightsavers, whose policies are relevant to ILEP because they focus on persons at risk due to disability, as well as on children. Their policy framework runs to 30 pages and includes explanations of what the policy is for, the organisation’s commitment to safeguarding especially children and persons with disabilities, a set of standards, implementation procedures (staffing, prevention, reporting etc), a code of conduct and various forms. The code of conduct is two pages long and consists of a set of very specific ‘I will’ and ‘I will never’ statements. All employees, trustees, consultants, volunteers and persons travelling on the organisation’s business are required to sign this code.

TLM’s policy framework is quite similar, and in fact, I don’t expect a great deal of difference between policy frameworks, as they are all trying to prevent the same harm.

InterAction, a network of aid agencies in the USA, has taken a different approach. It has designed a step by step guide that organisations can use to design their own policies and codes. But the key elements are similar.

Implications for partners

It is not enough for an international NGO to have a good safeguarding policy and code of conduct if its implementing or co-funding partners do not. So most organisations require partners to have safeguarding policies and procedures that are at least as strong as theirs. This will usually be a condition for ongoing partnership. No safeguarding policy, no partnership. Otherwise, the risks to children and vulnerable adults, and the risks to the good name of the international NGO, are too great.

What does this say for ILEP?

I suggest three possible ways ahead.

Status quo

It is likely that some ILEP Members have stronger safeguarding policies and codes of conduct than others do. This may pose a problem not only for vulnerable persons but also for the reputation of ILEP and its Members. Consider these scenarios:

- Members A and B are collaborating on a field program. Member A has strong safeguarding policies and processes, Member B does not. Children or vulnerable adults are abused as a result of weak processes. Reputational damage will fall on both organisations.
- Member C, which has weak policies and processes, is implementing a program with its field partner. Abuses occur, and the media become involved. It is soon known that this is an ILEP Member. All ILEP Members may suffer reputational damage.

All ILEP Members adopt a common set of safeguarding principles

This is a form of ‘light’ adoption of policy where each Member signs up to a brief summary of safeguarding principles. This goes part way towards a sense of shared responsibility, but probably does not solve the issues in the Status Quo scenario. If some Members do not see the principles as the starting point for a development of policies and code of conduct, there will remain reputational risks.
All ILEP Members adopt safeguarding policies and procedures, including codes of conduct. I am not proposing that the Secretariat will design a standard policy. I expect Members would follow models from their own countries, but some Members might like to see what others have done and use that as a reference point. Some Members may feel this is a big task, but in fact, there is a great deal of similarity between various organisations’ safeguarding policies and it is perfectly reasonable, especially for those Members with less capacity for policy formation, to simply adopt with minor changes a policy framework that looks suitable. Members that currently have safeguarding policies and codes of conduct would be encouraged to make them available.

Other actions could include:

- A discussion on safeguarding at the next cooperation meeting.
- Designating a ‘safeguarding lead’ on the Members’ Assembly to keep this topic active and offer Members advice on it.

I do not think that ILEP as Secretariat needs a safeguarding policy: the Secretariat has virtually zero interaction with children and at-risk adults. But there probably needs to be something on the ILEP website that describes what ILEP’s position and action has been on this subject.

Geoff Warne
September 2018