

Response to request for information on safeguarding from Secretary of State for International Development,

Rt Hon Penny Mordaunt MP

26 February 2018

Introduction

Our vision is of a world where everyone gets help they need in a crisis. Over 20,500 volunteers and 4,000 staff work together in support of our vision in the UK and overseas. We are independent, but have a permanent status as a humanitarian auxiliary to the UK public authorities.

We have a robust corporate policy framework in place, and are led by a Board and Executive Leadership Team deeply committed to providing a safe and secure environment for our people and those we seek to help. This includes ensuring our people understand how personal behaviour affects not only their own safety and security, but that of their colleagues, volunteers, partners and beneficiaries, particularly in the context of working with vulnerable people. We are committed to continuing to strengthen and improve our mechanisms, to ensure our people feel enabled and supported to come forward with any reports, concerns or allegations.

We operate overseas as part of the International Red Cross and Red Crescent Movement; the world's largest global humanitarian network. Compared to other UK-based aid agencies, we do not deploy a high number of staff overseas: around 220 delegates per year, plus 40-60 regular travellers from London. We acknowledge that there will always be a risk, but in the last five years we have had no reported cases of sexual misconduct by our staff working overseas. Nonetheless we remain committed to ensuring the safety and security of beneficiaries, staff and volunteers. Together with Movement partners the International Federation of the Red Cross and Red Crescent Societies (IFRC) and the International Committee of the Red Cross (ICRC), we will not tolerate any form of sexual harassment and misconduct, including sexual exploitation and abuse. We treat all allegations extremely seriously.

The recent revelations represent a watershed moment. We must work collectively to ensure that we all have the highest safeguarding standards throughout all stages of humanitarian response - from preparedness to recovery. High safeguarding standards help to ensure a culture where exploitation and abuse is not tolerated in humanitarian response settings and beyond, and is acted against accordingly. We are committed to working with Movement partners, as well as with the wider humanitarian sector and public authorities, to do this.

Our international programmes are predominantly delivered in partnership with the IFRC and, on-the-ground, by staff and volunteers of host National Societies. This way of working – through our multilateral and National Society partners – leverages the real power of the Movement to deliver humanitarian assistance in hard-to-reach areas. However, this approach can increase the risk

British Red Cross absorbs. Although our work often requires sensitive financial due diligence of partners and, where required, organisational development work and capacity building support to ensure we can institute appropriate controls to mitigate these challenges, we are not in control of partner organisations. We are committed to strengthening our due diligence procedures to include safeguarding assurances, and will continue to strengthen and improve our mechanisms and extending our influence to our National Society and Movement partners.

This document outlines the systems, processes, policies and culture that we currently have in place, to evidence and support these statements below, to assure the safety and wellbeing of beneficiaries, staff, volunteers and the humanitarian sector. This cannot however completely eliminate the possibility of poor or unacceptable practice at an individual level.

Within the spirit of continuous improvement, we provide assurance that:

- We have referred concerns about specific cases to the relevant authorities;
- We have clarity as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities, including the Charity Commission and funding partners such as DFID;
- We have adequate safeguarding policies, procedures and measures to protect people, and these are shared and understood;
- We have an organisational culture which prioritises safeguarding, including to encourage individuals to come forward to report any concerns with the assurance they will be handled sensitively and appropriately; and
- We provide a safe and trusted environment which safeguards our people and beneficiaries.

We have provided information on our continuous improvement plans across both our UK and International work, including plans to review and update relevant policies and procedures. We have also already undertaken a thorough review of reported incidents to ensure that we have taken appropriate action.

We look forward to engaging constructively across the international development and humanitarian community, including at the upcoming safeguarding summit and with the new DFID safeguarding unit, to discuss responses to ensure the protection of vulnerable people. We plan to explore ideas about how the sector can collaborate to eradicate all forms of sexual exploitation, abuse and misconduct. We also support the introduction of a clear and transparent system of references for all aid workers which can provide a factual statement on reasons for leaving previous roles (particularly around dismissal), to ensure safeguarding processes and mechanisms are sufficiently strong.^{1 2}

We wholly support the Secretary of State's call to action. We have a long history of partnership with DFID in working together to help people in crisis and we welcome continued dialogue about the ways that we can work together to shape a collective and effective approach to addressing these critical issues.

¹ <https://www.gov.uk/government/news/statement-from-international-development-secretary-on-oxfam-and-uk-action-to-tackle-sexual-exploitation-in-the-aid-sector>

² <https://www.gov.uk/government/speeches/penny-mordaunt-speech-at-the-end-violence-solutions-summit>

Who We Are

The International Red Cross and Red Crescent Movement (the Movement)

The International Red Cross and Red Crescent Movement is the largest global humanitarian network engaged in assisting people most vulnerable to disaster, armed conflict, migration, poverty, disease and climate change. The Movement is committed to, and bound by, seven Fundamental Principles³; and is comprised of three components:



The British Red Cross has four values (compassionate, courageous, dynamic, and inclusive), which sit alongside our **Fundamental Principles**.

British Red Cross - UK context

Our UK work is focused on emergency response, refugee support, independent living services, first aid and humanitarian education. In 2016 we provided support to over 900,000 people across the UK; with our UK Operations directorate including over 2,000 staff and 11,000 volunteers.

British Red Cross - International context

We work multilaterally with the IFRC and ICRC, and bilateral via long-term partnerships with 25 National Societies, of which 28% are in very high and 36% in high risk countries, according to the INFORM Index⁵ for risk management. The BRC provides both funding and technical support in the key areas of organisational development; disaster management (preparedness and response); disaster risk reduction; health; water, sanitation and hygiene; food security and livelihoods; financial management; logistics; and performance and accountability, including planning, monitoring, evaluation, and learning.

We deploy around 220 delegates per year overseas, plus 40-60 regular travellers from London. The majority of our people overseas provide management oversight, monitoring and evaluation, rather than direct services to crisis affected communities. However, those seconded to the ICRC and IFRC in post-conflict and post-disaster environments work on the humanitarian frontline with vulnerable communities.

³ While the Fundamental Principles are similar to (and in fact informed the development of) the wider 'humanitarian principles', they differ in interpretation in a number of ways, taking into account the Movement's unique mission and features. Please see: <http://Federation-media.org/interactive/wp-content/uploads/2015/12/FP-brochure-2015.pdf>

⁴ 191 National Societies as of February 2018

⁵ **INFORM** is a global, open-source risk assessment for humanitarian crises and disasters. It is a collaboration of the Inter-Agency Standing Committee Group on Risk, Early Warning and Preparedness and the European Commission; and can support decisions about prevention, preparedness and response.

Section One

Confirm that you have referred any and all concerns your organisation may have on specific cases and individuals to the relevant authorities.

Our practice is to report incidents to the relevant authorities at the time these occur. This includes referrals we have made to the police and other statutory authorities. Having reviewed safeguarding and misconduct cases over the past fortnight, we can confirm:

- There have been no dismissals of staff working overseas for sexual misconduct in at least the past five years.
- In the UK, there have been fifteen incidents involving volunteers in the last twelve months; and three staff that are currently under investigation. One incident has been reported to the Charity Commission, and a further ten will be reported shortly.
- None of these incidents relate to our work overseas.

In terms of our internal process, incident reporting leads responsible for key areas (including safeguarding, health and safety; and security) are responsible for referring incidents to the appropriate authorities (including police, as relevant), when these occur. These are escalated to the Board if they meet the criteria for reporting to the Charity Commission.

We have reviewed safeguarding and misconduct cases over the past fortnight. Whilst we consider these cases have been referred to the police and other appropriate authorities, through our in-depth review and on further consideration of the reporting criteria, we have identified ten further incidents which took place in the context of our UK work, which will also be reported to the Charity Commission (eight from 2017, one from 2016 and one from 2015) which were not considered to meet the threshold of a reportable serious incident at the time. Out of an absolute desire for transparency and clarity, we will immediately report these to the Charity Commission. The reports to the Charity Commission will also provide details of our internal management responses at the time. We confirm that none of these incidents relate to our work overseas.

We confirm there have been no dismissals of British Red Cross staff working overseas for reasons relating to sexual misconduct in at least the past five years. We have also confirmed with the IFRC, who have stated that there are no cases on record involving British Red Cross staff in the last five years. All of our staff working overseas are bound by the strict IFRC Code of Conduct, which sets clear standards prohibiting sexual exploitation and abuse, harassment, discrimination and extends to any use of sex trade workers.

We are a voluntary organisation with over 20,000 volunteers in the UK. In the past year, 15 of those 20,000 volunteers have been investigated concerning incidents related to sexual misconduct and appropriate action has been taken, resulting in 11 dismissals. Three members of our UK-based staff are currently subject to allegations of sexual harassment or misconduct, all of whom are currently being investigated. There have been no further dismissals of British Red Cross staff working in the UK for sexual misconduct in the last year.

Section Two

Provide assurance that you have absolute clarity as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities, such as the [Charity] Commission and to funding partners such as my own Department.

We have clarity as to how incidents and allegations will be handled should they arise and onward reporting to relevant authorities, including the Charity Commission and funding partners, such as DFID. Below you can find reference to:

- Our incident reporting and safeguarding concerns process; and
- Details of our continuous improvement plan related to this.

Datix incident reporting system

In 2016 we introduced an electronic incident reporting system, Datix. This system enables our people to report incidents, accidents and near misses quickly, so that we can follow up and investigate concerns, necessary changes can be made and we can manage risks associated with the work we do. We have used this same system to record international security incidents since early 2017. In 2018, we will continue to embed Datix and seek to improve the reporting culture in all areas of the organisation.

Serious incidents

Incident reporting leads for each area (for example, fundraising, safeguarding, information governance, health and safety, internal audit, international) escalate to the Governance Team when a potentially serious incident has occurred meeting the Charity Commission's criteria. This usually falls under one of the key areas of the Charity Commission's guidance: fraud and theft; significant financial loss; anonymous donations; UK service delivery; health and safety; and safeguarding. The Governance team are also consulted if it is unclear whether the criteria have been met, to seek advice or clarification on whether an incident is reportable.

Whilst we are satisfied that those reported incidents are being managed appropriately, there is potential to further improve the escalation process for serious incidents, and we plan to take this forward as part of our continuous improvement plan.

Disciplinary action

We have formal disciplinary processes (one for staff, and one for volunteers). Where there are allegations of misconduct or where our policy has been breached, the line manager or an independent peer will conduct an investigation to gather all the facts. Where we believe that at least one of the substantiated allegations amounts to gross misconduct having taken place, this will result in summary dismissal.

Gross misconduct is defined as conduct where we no longer have trust and confidence that an individual will fulfil the obligations of the employment contract. It results from "a serious act or series of actions of discrimination or harassment against a fellow employee, volunteer or member of the public"; and represents a breach of contract.

Safeguarding concerns process

Safeguarding concerns are logged and investigated and escalated as appropriate. Our thorough safeguarding procedures have been reviewed and updated in the past 12 months, and our safeguarding policies apply corporately across our UK and International operations. Our approach to the management of safeguarding incidents is examined on a quarterly basis by the relevant sub-committee of the Board. Terms of reference for the Service Quality and Assurance Committee (covering UK operations incidents) and the Health, Safety and Security Committee (covering International incidents operations) are publicly available on our website [here](#).

When a potential safeguarding incident is identified in relation to our UK Operations, the staff or volunteer who identifies this must contact a Safeguarding Adults Officer or Safeguarding Protection Officer (Children and Young people) depending on whether the alleged victim of abuse is an adult or a child. The relevant officer would provide advice and guidance on next steps so that the reporter is clear about the actions they must take. There are approximately 200 trained safeguarding officers who undertake this role, on a voluntary basis, in addition to their main staff role, which ensures we can support a broad service and geographic footprint.

Internationally, all British Red Cross staff working overseas sign up to the IFRC Code of Conduct (or the ICRC Code of Conduct, if they are seconded to the ICRC), which outlines the standards of behaviour expected. This includes prohibition of sexual exploitation and abuse, harassment, discrimination and extends to any use of sex trade workers. Delegates are required to escalate any suspicion of wrongdoing to their manager in the field or to International Human Resources (HR), where it is investigated and escalated.

Internal process for escalating serious incidents

The Governance team prepares advice for decision about reportable serious incidents as they occur, and provides quarterly briefings to the Board of Trustees on reportable serious incidents. Board committees are involved in the strategic oversight of follow-up around serious incidents within their remit, including oversight of actions arising from investigations as appropriate.

Reporting serious incidents to the Charity Commission

We are under a statutory duty to confirm as part of the Annual Return process that all serious incidents have been reported to the Charity Commission. In practice this means we advise the Charity Commission of an incident once we become aware of it and follow-up once an investigation has concluded. Follow up notifications include details of mitigating actions taken (for example, strengthening policies and procedures; awareness raising of relevant internal processes; disciplinary action against relevant individuals).

Reporting serious incidents to other regulators

In addition to our responsibilities to our primary regulator, we also have a responsibility to report relevant incidents to other regulators to whom we report, including the Care Quality Commission for England; Care Inspectorate Wales; and Care Inspectorate Scotland; the Health and Safety Executive; the Information Commissioner's Office; and Monitor. In the course of our safeguarding work, wherever relevant we make referrals to the police and statutory authorities.

Reporting serious incidents to partners

We are under a contractual obligation to report serious incidents to partners affected by serious incidents on a range of grounds, including to DFID for fraud and theft in our international work.

We confirm we have met our obligations to report relevant serious incidents to you, and have where appropriate extended this requirement by advising DFID of serious incidents we have reported to the Charity Commission which do not affect DFID funds, for your broader awareness and to illustrate our commitment to transparency.

Continuous improvement plan

Reflecting on our incident reporting policy as we have prepared this response, we plan to amend our incident reporting policy to reflect our current reporting practice to alert funders such as DFID to relevant serious incidents, and plan to make this amendment as part of our internal improvement plan developed following your letter.

We have not had any sexual exploitation or abuse incidents reported to us in the past five years related to our International work. Internationally we record incidents using a security incident reporting form, logged centrally by the International HR team. Incidents related to sexual harassment and abuse of our own staff are recorded as security incidents and escalated as appropriate. We are not complacent and recognise that we can always do more to improve and strengthen our due diligence procedures, and we are committed to doing so.

We have a clear vision for the continuous improvements we plan to make to our reporting processes as we move forward. This includes:

- A specific reporting procedure for sexual exploitation and abuse for our international work. This is well underway, and we will finalise with the IFRC handling of reports that may be happening in other parts of the Movement.
- We plan to train child protection and sexual exploitation and abuse focal points to manage reports received, and formalise a task force to manage incidents.
- In our seven country offices (Bangladesh; Kenya; Lebanon; Malaysia; Nepal; Senegal; and Sierra Leone), we will agree referral mechanisms to specialist agencies that could support us in dealing with any reported cases of sexual exploitation or abuse.

Section Three

Provide assurance that you have adequate safeguarding policies, procedures and measures to protect people and these are shared and understood.

- We have a sound framework of policies and procedures in place, available to all of our people. We also make our safeguarding policies available publicly.
- The IFRC Code of Conduct prohibits any act of sexual exploitation or abuse.
- We had already planned to implement the BRC Code of Conduct in early 2018, which will increase understanding of our policies and procedures with all staff and volunteers. The BRC Code has explicit reference to our zero tolerance of sexual exploitation, sexual abuse or sexual violence.
- There will always be more to do to ensure our safeguarding policies and procedures are shared and understood by all, including as we reinforce standards of behaviour that we and the people we serve expect. We will manage this on an ongoing basis, right from the induction process, to ensure that people who engage with us do so in safety.

Our safeguarding policies are publicly available on our website and can be found [here](#).

IFRC and British Red Cross Codes of Conduct

The IFRC Code of Conduct (IFRC Code) sets clear standards prohibiting harassment, abuse, discrimination, as well as sexual exploitation and abuse. The IFRC Code includes the prohibition of any act of sexual exploitation or abuse; this includes engaging in sexual activities with anyone that the organisation seeks to protect or assist. It also stipulates that staff and volunteers must not 'exchange money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This prohibition extends to any use of sex trade workers'. In addition, it also lays out the responsibility of all staff to report any concerns or suspicions regarding any violation.

Over the past few months we have developed a proposal to introduce a new British Red Cross Code of Conduct (BRC Code) for staff and volunteers in the UK which summarises in a two-page format the IFRC Code and the key standards our people should be aware of. Each of the ten standards in the BRC Code has a policy sitting behind it which offers more detailed guidance (for example: more information about our 'zero tolerance of fraud' can be found in the fraud, bribery and corruption policy). We are now in the final stages of consultation, before we take forward implementation.

As a member of the International Red Cross and Red Crescent Movement the British Red Cross is committed to, and bound by, the **seven Fundamental Principles**. For those representing the Red Cross or Red Crescent, it is essential to develop an in-depth understanding of what these principles mean, and how they guide our work at all times. This forms part of our basic induction process for any new staff member or volunteer. In this introductory training, it is emphasised that staff and volunteers are prohibited from taking action or behaving in any way whatsoever which may damage the reputation or image of the Movement.

Harassment, misconduct and safeguarding

The British Red Cross has established policies and procedures for responding to harassment, misconduct and child and adult safeguarding. These are widely published and available to all staff and volunteers.

Whilst corporate policies and practices aim to reduce risks such as sexual exploitation and abuse, we know that these can never be eliminated completely. For this reason, reporting practices and action are equally important to ensure that if we become aware of a concern, we can respond expeditiously.

Our two-day volunteer foundation training and our staff induction aim to provide staff and volunteers with a basic level of awareness of the types of abuse or misconduct, so that they know how to identify and report safeguarding issues should they come across them. We are in the process of developing and implementing service-specific training for staff and volunteers across our UK services. All of our policies and procedures are explicitly available to all volunteers and staff on our intranet (under the A-Z of Policies and Procedures; and the HR Portal) and a dedicated advice and support service has been established, which all of our people can either call or email directly. Line managers similarly have direct access to HR advice and support.

Raising a concern (Whistleblowing)

We welcome and encourage the raising of any concerns. Our policy and related procedure enable any individuals to report suspected concerns within a supportive environment. We also have a number of related policies and procedures providing advice to our people on:

- Fraud or theft: see the fraud, bribery and corruption policy.
- Safeguarding: see safeguarding policies and procedures.
- Complaints: complaints procedure.
- Bullying and harassment (unless as a direct result of raising a concern): see the Harassment and Bullying procedure.
- Health and Safety: see the health and safety policies.

In addition, our raising a concern process is supplemented by our HR related policies, including those covering recruitment and selection; criminal records checks; grievance; disciplinary (for staff) and volunteer complaints, issues and concerns (for volunteers); and incident reporting. These form part of our internal policy framework and help support our people in their work.

Incident reporting policy

The incident reporting policy confirms our internal process for reporting incidents, accidents and near misses. This includes those considered serious incidents. Incidents can be reported to us through the following mechanisms:

- Datix incident reporting system
- Raising a concern (Whistleblowing process as above)
- Complaints policy and procedure
- SafeCall (as below)

Deploying our people in emergencies

A large part of our work involves responding to emergencies, sending staff to work on IFRC response operations with 24 to 48 hours' notice. In order to meet our safeguarding requirements, we maintain a register of pre-recruited people who have been checked and trained. This enables us to deploy them at short notice and ensure we are able to meet the requirements of our internal safeguarding procedures.

Volunteering policy

Our volunteering policy allows young people 15 years and over to become volunteers for the British Red Cross, largely in our high street charity shops across the UK. We have 20, 500 volunteers, currently around 400 volunteers are aged 15-17, volunteering in shops across the UK. When we work with young volunteers under the age of 18 we ensure that specific, stringent, requirements are met and guidance is followed. For example, volunteers under the age of 18 volunteering in shops must be accompanied by at least two adults at all times, at least one of whom will have received safeguarding training.

International safeguarding

The safeguarding children and young people policy, the raising a concern procedure, our complaints policy and procedures, harassment and bullying procedure and the disciplinary procedure are applicable to both UK and international staff.

As standard in our Grant Agreement Documents (GAD) with our international partners including host and partner National Societies, and the ICRC, a number of clauses relate specifically to the prevention of sexual exploitation and abuse (section 6):

6.1. The grant recipient will take all necessary measures to prevent, stop and, if proven, take action against, any sexual exploitation and abuse and provide the British Red Cross with all its policies in this respect.

6.2. Should a staff member or volunteer directly involved in the project funded by the British Red Cross be reasonably suspected of being associated with, or engaged in, sexual exploitation or abuse, the British Red Cross shall be entitled to suspend funding so long as the said staff member or volunteer remains involved in the said project."

We are in the process of agreeing a specific Grant Agreement Documents model for the IFRC, which will also include these sexual exploitation and abuse clauses as standard. We are committed to ensuring that these standards are upheld.

International recruitment and selection procedures

Similar to our work in the UK, the same principles apply to our overseas staff where pre-employment checks include at least two satisfactory references and a Disclosure and Barring Service check (enhanced) or local equivalent - generally a check from the police (if they are not UK residents).

They also receive fit-to-travel medical examinations, including mental health screening; and training in behaviours-based personal security, the prevention of sexual exploitation and abuse, and an introduction to child protection. All delegates must escalate any suspicion of misconduct to their manager in the field, or to International HR so it can be investigated and escalated.

Currently, for staff who travel regularly overseas but are not undertaking a regulated activity, we are unable to seek an enhanced DBS check. Should aid workers based in the UK be considered as undertaking a regulated activity in the future, we will of course seek DBS checks for all staff. In addition, we also undertake criminal record checks on all staff and volunteers who have regular, unsupervised contact with children and/or adults at risk.

UK recruitment and selection procedures

We have clear procedures in place to undertake pre-engagement checks of a candidate's background prior to them commencing work with children and/or adults at risk, in roles which:

- are subject to CQC regulation (or the equivalent in Scotland, Wales and Northern Ireland);
- or are involved in regulated activities but are not subject to an external regulator.

We undertake enhanced criminal records checks before our people start working in those roles. This level of check includes spent convictions, entries on the registers that bar people from working with children and/or adults at risk and any other concerns held on police records.

UK legislation does not allow these levels of checks to be undertaken for roles which do not undertake regulated activities or involve working with vulnerable people (for example, our Retail operations). In these cases, a basic check could be requested which will reveal only those convictions which are unspent, but this is not our practice.

In terms of references, when recruiting candidates for staff roles in our regulated services, we specifically request former employers to indicate if there were any disciplinary issues or if they have concerns about safeguarding. This is not always possible for volunteers. When recruiting for roles which do not undertake regulated activities or involve working with vulnerable people, we request two references for staff roles; and one reference for volunteer roles.

Organisational Crisis Incident management team

Critical incidents, for example kidnapping, serious illness or sexual assault, are referred to the Overseas Critical Incident Management Team (OCIMT). The team is London based and comprises five core roles: Team leader, HR, Security, Communications, and Information Management. A senior manager, either the CEO or Executive Director of People and Learning, provides strategic oversight of the team and is managed by exception. There are several people trained in each role who rotate 'on call' and are available at short notice should there be a need for specialist technical support, such as a person trained in psychosocial support.

Training is carried out once per year and the competence of the team is assessed during desktop simulation exercises. The team operates under a planning framework which is regularly reviewed and updated with industry best practice. A designated emergency room is stocked with communication and other equipment. OCIMT can be convened within minutes of an incident being reported.

Section Four

Provide assurance that you set an organisational culture that prioritises safeguarding, so that it is safe for those affected to come forward, and to report incidents and concerns with the assurance they will be handled sensitively and properly.

- As an organisation, we are committed to maintaining and cultivating a culture where our people feel safe to speak up about any aspect of the work of the organisation: this will remain an ongoing priority.
- More specifically, we are creating an organisational culture which prioritises safeguarding, including encouraging individuals to come forward to report any concerns with the assurance they will be handled sensitively and appropriately: this requires constant work and nurturing.

As an organisation, we are committed to maintaining and cultivating a culture where our people feel safe to speak up. We are committed to providing a work environment that is free from inappropriate and offensive behaviour, intimidation, threats, discrimination, and harassment or bullying. Sexual harassment or misconduct against or perpetrated by our staff in the UK or overseas will always be a risk, as in any organisation, but will not be tolerated.

As an organisation with both a UK and an International purpose, we have two senior safeguarding leads: a lead for our work in the UK and a lead for our work overseas. We have a Trustee on our board with responsibility for safeguarding; and a Freedom to Speak up Guardian. Following the **Francis report**, NHS trusts and organisations delivering services under NHS contract must appoint a Freedom to Speak Up Guardian to support a culture of transparency and accountability, by helping our people to raise concerns in an open environment and in support of continuous improvements, including in areas such as quality and patient safety. At the British Red Cross, our Freedom to Speak up Guardian is the Head of Internal Audit.

Safeguarding in Emergency Response

As part of our support for deployment in emergencies, we are committed to supporting partner National Societies through capacity-strengthening, knowledge-sharing and peer-to-peer learning.

During 2015 and 2016, a comprehensive review was undertaken of the Movement's global surge capacity for responding to emergencies. One of the major recommendations was to strengthen mainstreaming of various thematic issues into our global surge tools, including protection for beneficiaries, community engagement and accountability, gender and inclusion. A dedicated work-stream is focused on strengthening mainstreaming of these issues and developing specific competencies for staff being deployed, improving training available and practical field guidance covering areas including protection; gender and inclusion in emergencies; sexual and gender based violence prevention and response, child protection, and psycho-social support.

Staff deploying overseas, including delegates and those in the Emergency Response Unit, complete one-week training which includes a specific section on sexual exploitation and abuse.

Internal communication

Our Chief Executive writes a regular blog to provide updates on recent events and emerging issues. In November 2017, in light of the #MeToo movement, one of the posts restated our commitment to ensuring our people feel safe to speak out in confidence, and assurance that any disclosures will be managed sensitively and appropriately.

On 15 February 2018, our Chief Executive sent a note to staff and volunteers reminding our people that they have a range of options to report any concerns and the routes to do so, providing links to the most relevant corporate policies and procedures. In the note, our Chief Executive wrote: *“The incidents highlighted in the media, which centre on Oxfam but impact more widely, have shone a light on unacceptable practices and a failure of vigilance. It's also important to recognise that the issues under the spotlight are not just overseas but also from within the UK.”* We believe it is vital that our people know and understand their rights and responsibilities. The Chief Executive's message confirmed that the organisation is taking this matter extremely seriously, that sexual misconduct remained a risk in the UK and overseas, encouraged people to seek support through our employee assistance program and announced the introduction of SafeCall (see below).

We also run a series of regular events to promote our internal processes, including an annual safeguarding week each November to remind our people of their rights and responsibilities, and seek to promote policies and procedures to all of our people. This has included the use of external speakers to share safeguarding best practice.

Improvement Plans

We have contracted an impartial, external ethics hotline service (SafeCall) as another route for our people to confidentially report any concerns. This will allow our people to flag any issues in a safe and secure manner, when they do not feel able to use existing procedures that we have in place. As our Chief Executive said when announcing SafeCall, we hope our people will feel able to raise any concern they have either directly with their line manager or through SafeCall.

We recognise that we can always do more to ensure that all our people and those who come into contact with us, including beneficiaries, know how to make a report safely and with the confidence that we will deal with it appropriately. We plan to enhance the online introduction to protection from sexual exploitation and abuse training for International staff, to emphasise reporting routes and add the SafeCall contact information. Through our community engagement and accountability approaches, we will develop informational material to enable beneficiaries to know how to report any allegations.

Section Five

Provide assurance that you provide a safe and trusted environment which safeguards anyone who your organisation has contact with, including beneficiaries, staff and volunteers.

- We remain committed to maintaining and sustaining an organisational environment which safeguards all.

We strive to ensure all of the people who engage with our organisation do so in safety. We are committed to providing the highest attainable standards of safeguarding and protection, and our safeguarding policies provide the foundation for these commitments. As part of our commitment to transparency we publish both our safeguarding adults and safeguarding children and young people policy on our website (available [here](#)).

Emblem and Fundamental Principles

The red cross emblem is one of the most internationally recognised symbols and continues to attract trust and represent credibility around the world. Established under the 1949 Geneva Conventions, it remains a symbol of neutrality and protection in armed conflict. Any emblem misuse may lead to a loss of confidence and a mistrust of the emblem, weakening its effectiveness, and ultimately this could put our staff, volunteers and beneficiaries at risk. Likewise, should staff or volunteers working under the banner of our emblem behave in a way that is not reflective of the emblem; the IFRC, ICRC and forthcoming BRC Codes of Conduct; or the Fundamental Principles of the International Red Cross and Red Crescent Movement, this would disrupt our ability to carry out our lifesaving work. It may also threaten and damage humanitarian operations across the world.

We recognise the particular trust that lies in the hands of those assisting the most vulnerable and that we have a special responsibility, as embodied in the Fundamental Principles, to create and maintain safe environments – free from harm and threat – in our workplaces and for all those that we seek to assist. We are deeply committed to our responsibility to safeguard all people who come into contact with us, including our own staff and volunteers. We treat any and all allegations of sexual misconduct extremely seriously. Any violations will lead to disciplinary action and where appropriate will be reported to the police.

Employee Handbook

Within our employee handbook, we emphasise that we will not tolerate any type of bullying or harassment and will ensure that we encourage any individual to raise their concerns with us should this occur. Allegations of bullying or harassment will be dealt with seriously and confidentially, consistent with our harassment and bullying procedure.

Code of Conduct

In the early 1990s the British Red Cross participated in establishing an *organisational* Code of Conduct, the Code of Conduct for the International Red Cross and Red Crescent Movement and Non-Governmental Organisations (NGOs) in Disaster Relief, put in place in 1995. Over 600 agencies have signed the Code of Conduct. Whilst there is no specific mention of safeguarding, it clearly sets expectations for creating a safe and trusted environment for staff, volunteers and beneficiaries alike.

In addition, since 2007 all British Red Cross staff working overseas with the IFRC have been bound by a strict IFRC *staff* Code of Conduct (IFRC Code) – which provides clear standards of personal behaviour. In October 2017, we extended the requirement to sign the IFRC Code to all staff working in our International Directorate to sign the IFRC Code, not just those working overseas. Since this has been put in place, 99.7 per cent of the International Directorate have signed the IFRC Code. There is also an e-learning module which all staff must complete, to ensure clear understanding of the IFRC Code.

Community Engagement and Accountability

We believe effective humanitarian and crisis response should focus on individuals and communities at the heart of an emergency. People should be supported in their local communities and local communities should be empowered to respond. The people affected by crisis whom we serve must be recognised as agents of change within their own communities. We work to ensure that communities are empowered to lead and shape positive, sustainable change in their own lives, to influence decisions affecting them and importantly that all relevant stakeholders can be held to account, including through regular and clear communications and collaborative approaches to problem solving.

We have committed at Board level to the Core Humanitarian Standard on Quality and Accountability (CHS) through our membership of the CHS Alliance and the Disasters Emergency Committee (DEC). Community engagement and accountability is a core component of the CHS. As a CHS Alliance member we are required to carry out an external verification audit against the CHS every two years, and to report progress annually against an improvement plan derived from the findings. The CHS requires evidence of a code of conduct in place for staff and volunteers which prohibits sexual exploitation and abuse.

Core Humanitarian Standards: assessment and verification process

We undertook a self-assessment against the CHS in 2016, with a report and an improvement plan presented to the DEC and CHS Alliance in early 2017. We have commissioned the Humanitarian Quality Accountability Initiative to carry out an independent third party verification audit against the CHS, and agreed corrective actions which will be incorporated into our 2018 CHS improvement plan.

The CHS contains a number of elements important in preventing and dealing with sexual exploitation and abuse, including:

- Consideration of needs, risks, vulnerabilities and capacities of different groups (CHS 1.2)
- Programmes are realistic and safe for communities (CHS 2.1);
- Policies and action on unintended negative consequences (CHS 3.6 & 3.7); and receiving and dealing with complaints (CHS 5.1 to 5.7)
- Safeguarding of personal information collected from crisis-affected people (CHS 3.8)
- Information sharing on expected standards of staff behaviour (CHS 4.1 & 4.5), and implementation of a code of conduct (CHS 8.7); and staff policies and consequences of non-adherence (CHS 8.2) and preventing and dealing with corruption (CHS 9.5 & 9.6).

Continuous improvement plan: a summary of actions

In the spirit of continuous improvement, we will be taking forward a program of work over the next few months which will include the following priority areas:

We will take forward the introduction of the BRC Code of Conduct, which will apply to all of our staff and volunteers.	Implement by end Q2 2018
We will take forward implementation of our new impartial ethics hotline, SafeCall; and add this to our policies, procedures and processes (specifically whistle blowing). This will include further internal communications to our people to encourage any disclosures.	Updated policies by end Q2 2018
We will review and update our recruitment procedures to identify areas for improvement, including adding reference to our zero tolerance policy of all abuse and harassment.	Procedures updated by end Q2 2018
We will review and formalise our policy and approach to references. <ul style="list-style-type: none"> We also plan to engage with the sector on a co-ordinated response to references for aid workers. 	Policy updated by end Q2 2018 Ongoing
We will review and update relevant policies and guidance (including on incident reporting and fraud, bribery and corruption) to reflect our current practice of reporting serious incidents to our funders, including DFID. <ul style="list-style-type: none"> We will also consider improvements to internal reporting processes. 	Policies and procedures updated by end Q2 2018
We will develop a specific reporting procedure for sexual exploitation and abuse for our International work. This is underway, and we will finalise with the IFRC handling reports in other parts of the Movement.	Procedure agreed by end Q2 2018
We also plan to train child protection and sexual exploitation and abuse focal points within International to manage any reports received, and formalise a task force to manage incidents.	Completed by end Q2 2018
In our seven country offices we will agree referral mechanisms to specialist agencies that could support us in dealing with any reported cases of sexual exploitation or abuse.	Mechanisms agreed by end Q3 2018
We will ensure completion of training modules on the IFRC Code of Conduct; as well as introductory training on child protection and preventing sexual exploitation and abuse.	Completion required from Q2 2018
We are committed to strengthening our due diligence procedures to include safeguarding assurances, and will continue to strengthen and improve our mechanisms and extending our influence to our National Society and Movement partners.	Procedures strengthened by end Q2 2018
We will engage constructively across the international development and humanitarian community to discuss responses to ensure protection of vulnerable people.	Ongoing