

**Agenda Item: Safeguarding and Incident Management**

**Summary:**

This paper is the IPPF 2020 Annual Incident Management report. This is the first report of its kind and seeks to provide data, analysis and narrative looking back over 2020 against the backdrop of 2019. The report provides an overview of the progress made over the last year, and highlights the weaknesses, areas for improvement, and key opportunities.

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**Action Required:**

- The Board to read and note the report and to advise if this report provides the information it requires in this area of governance.

**KEY TO ACRONYMS:**

<b>BHV</b>	Bullying Harassment and Victimisation
<b>BoT</b>	Board of Trustees
<b>C-FAR</b>	Finance and Resources Committee
<b>DLT</b>	Directors Leadership Team
<b>EWP</b>	Employment and Workplace Matters
<b>FMAP</b>	Fraud and Malpractice
<b>IC/ICs</b>	Incident Coordinator/s
<b>IM</b>	Incident Management
<b>MA/s</b>	Member Association/s

# 2020 Annual Report - Incident Management Report

## 1) Performance Summary

In 2020, significant and important improvements were achieved in the management of incidents and concerns reported to IPPF SafeReport; IPPF's independent, confidential reporting service/incident management system - launched globally, in early 2019. The improvements achieved are set against 2019 year-end position.

### Year on Year Context

By the end of 2019, a total of 74 reports had been submitted to IPPF SafeReport, but only five of those reports were progressed to conclusion and closure by nominated Incident Coordinators (ICs). ICs are IPPF staff nominated to undertake this work in addition to their existing roles. This poor performance was a direct result of weaknesses in the approach, planning and implementation of IPPF's refreshed commitment to safeguarding through which the function of incident management emerged, not adequately understood, or planned for in terms of resource or process. Two key weaknesses were identified:

- 1) Messaging about IPPF SafeReport led to unintended consequences and misunderstanding:** i.e., that safeguarding and incident management were the same thing, as shared with the Board in November 2020 Board Meeting i.e., while all safeguarding incidents need to be managed, not all incidents are safeguarding incidents.
- 2) Inadequate incident management infrastructure put in place before the system was launched:** required to effectively deliver the commitments made and compliance required; in alignment with sector standards and IPPF policies and values.

Key to the inadequacy of the infrastructure, was that by the end of 2019 - a full year after IPPF SafeReport was launched - only five ICs had been identified across the Secretariat, despite an agreed IPPF SafeReport procedure that required all regions to identify nominated ICs so they could be trained. In addition, the work required of nominated ICs, was not provided for in terms of training and was added to individual's existing roles with no introduction support or explanation before the system went live.

This resulted in no action being taken on the majority of concerns reported, leading to a backlog of 69 open cases (93% of the total case load) at the end of 2019. This seriously undermined the credibility of IPPF SafeReport and, in turn undermined the safeguarding work in progress as confusion grew that the majority of backlog of cases were safeguarding cases.

In respect of Member Associations' (MAs) actions and capacity in this area, no data is available as this information is not collected nor is (yet) a feature of the MA accreditation system. From information available in the caseload, many MAs did/do not have the expertise, or resources to manage cases effectively and in relation to the investigation information available and some MAs do not have the requisite skills needed to conduct thorough interviews.

### 2020 Year-end overview

Positively, many of the issues identified were addressed in February 2020, with direction that all regions should nominate ICs to increase capacity to effectively manage and progress concerns reported. In addition, while impacting progression of the safeguarding agenda, it was decided that the Safeguarding Team would reprioritise work delivery by focussing on the oversight of all cases in the 2019 backlog, resulting in other vital safeguarding work being deferred, including training and support with policy work and compliance.

By the end of April 2020, a 60% increase in the number of ICs identified was achieved, taking the total to 25. Tailored training was designed and delivered to all ICs by the small London team, which was well received and assessed as very good by participants. In addition, management information reports were revised to support improved ownership of open cases. Unfortunately, 10 ICs left the organisation during the Secretariat restructure. These have gradually been replaced by other existing staff and some newly recruited to IPPF.

Collectively, these changes resulted in significant work between February and June 2020 which saw a further 44 cases closed. By the end of 2020, 81 new concerns had been reported, bringing the cumulative total of reports submitted since the system went live to 155 cases.

By the end of 2020, the total number of open (2019) cases reduced from 69 to 30; a reduction of 33%. A total of 71 (46%) cases reported in 2019 and 2020 cumulatively, progressed to closure. A total of 84 (45%) cases remain open, of which 30 were reported in 2019 and 54 in 2020.

While this work requires ongoing close monitoring, increased prioritisation in some locations and a range of operational improvements, overall performance trends are positive, with measurable improvements achieved, and reported to the Directors Leadership Team (DLT), Finance and Resources Committee (C-FAR) and the BoT.

## 2) Trends and Analysis




### Reporting, and operational oversight

In 2020, Incident Management Reports were produced monthly and discussions took place at several DLT meetings. These reports provide management information on the IPPF SafeReport caseload, through a range of data sets, including by region, by category and by incident type etc. Reports were also presented to the C-FAR in April and September 2020 and to donors at various meetings.

### Most reported concerns

Table 1 shows the most reported concerns, which has remained static for two years.

**Table 1**

Most commonly reported concerns				
	2020 (%)	2019 (%)	Total	Year on Year
(1) Bullying, Harassment and Victimization	27 (33%)	16 (22%)	43 (27%)	
(2) Employment and Workplace Matters	19 (23%)	22 (30%)	41 (26%)	
(3) Fraud and Malpractice	16 (20%)	24 (32%)	40 (25%)	

It is concerning that by the end of 2020, (1) Bullying, Harassment and Victimization (**BHV**) cases rose by 11% year on year as a percentage of the total case load. However, it is important to set this increase against the outcomes of the 15 BHV cases closed to date, of which, 67% were unsubstantiated and 13% were substantiated.

The next most reported categories are Employment & Workplace Matters (**EWM**) and Fraud & Malpractice (**FMAP**). These two categories saw respective reductions in new cases of 7% and 12% year on year, following focused attention by a range of colleagues. However, by the end of 2020, 10 cases Fraud cases remained open, and nine of those related to the Africa Regional Office and one about an MA in that region. So, while we have a reduction in the number of new cases, the number of open historical cases remains a concern, both in Africa and the Arab World.

**Table 2**

Outcomes of all closed cases 2020 (cumulative)					
Substantiated	Unsubstantiated	Partially Substantiated	Retracted		
18 (25%)	45 (63%)	4 (6%)	4		
Outcomes of the most reported concerns (cumulative)					
	Cases closed by end 2020	Substantiated	Unsubstantiated	Partially Substantiated	Other
(1) Bullying, Harassment and Victimization	15	2	10	1	2
(2) Employment and Workplace Matters	14	0	14	0	0
(3) Fraud and Malpractice	27	11	13	3	0

### All categories of concern

Table 3 provides summary data on the cumulative number of concerns across all categories reported to IPPF SafeReport to 31-12-20. It also indicates the split between cases reported about MAs and those reported about the Secretariat.

**Table 3**

Incident Category - Cumulative reports received by 31-12-20	Total number of cases	Of total figure, no. of cases related to MAs
<b>(1) Bullying and Harassment/Victimisation</b>	43	13 (30%)
<b>Bribery and Corruption</b>	2	1 (50%)
<b>Confidentiality and Data Protection</b>	7	5 (71%)
<b>Conflict of Interest</b>	4	0 (0%)
<b>Discrimination</b>	3	1 (33%)
<b>(2) Employment and Workplace Matters</b>	41	18 (44%)
<b>(3) Fraud and Malpractice</b>	40	19 (47%)
<b>Health &amp; Safety</b>	1	1 (100%)
<b>Money Laundering</b>	1	0 (0%)
<b>Quality of Service</b>	1	1 (100%)
<b>Security</b>	1	1 (100%)
<b>Sexual Exploitation and/or Abuse*</b>	3	3 (100%)
<b>All Other Forms of Abuse*</b>	3	0 (0%)
<b>Sexual Harassment*</b>	5	3 (60%)
<b>Total number of concerns reported to IPPF SafeReport</b>	155	66
<i>*Safeguarding cases – discussed in the annual safeguarding report</i>		

### Key summary of caseload

- By the end of 2020, of the cumulative total of 155 concerns reported, 63 (40%) relate to Member Associations, 78 (50%) relate to Regional Offices, 3 (2%) relate to MA and RO and 11 (7%) to other categories. These figures have remained relatively static.
- In relation to Fraud cases, for every one case reported about alleged Fraud in MAs, we received two cases about the Secretariat. For Malpractice however, for every one MA case, we have three for the Secretariat. In regions with higher caseloads in the FMAP category it is clear that leaders are focusing time, energy and oversight on these matters.
- The IPPF SafeReport service remains significantly underutilised by IPPF clients/beneficiaries. This appears to be as a result of a lack of engagement, promotion and sensitisation of the service by MAs to the client and other communities they work with. In addition, there are many MAs that do not yet have in place policies such as Raising a Concern, Respect at Work and Safeguarding (Children and Vulnerable Adults).
- Staff feel able to report their concerns; this is a positive step; however, the slow progress of cases has undermined trust in the system.

- In 2020, a small number of staff used IPPF SafeReport as a means to raise their dissatisfaction with the restructuring process and outcomes, contributing to the 11% increase in BHV cases. In addition, complaints/allegations were submitted in the category of BHV about what appears to be change management in progress i.e., changes in leadership resulting in the implementation of required operational change and improvements. It is normal for some staff to struggle with the change management process, albeit these being ‘reasonably required’ management expectations.
- There is a small number of staff that appear to seek to intentionally undermine the credibility of IPPF SafeReport through the submission of vexatious reports. These matters are taken seriously and where necessary and possible, IPPF Policies provides for action to be taken against such individuals.

### 3) Learning Lessons

The analysis of all case categories highlights the following key points and lessons to be considered:

1. When IPPF SafeReport was implemented in 2019, the infrastructure, agreed standards and guidance resources were not developed or put in place effectively to effect successful achievement of the initial and growing case load.
2. The addition of IC work allocated to staff in addition to their existing role, without effective training and guidance, resources and agreed standards in personal annual performance targets has had a negative impact on progress and remains a weakness. Plans to address this have been ongoing throughout 2020 and will continue in 2021.
3. While the people resource available to progress cases increased by 60% in 2020, bringing a significant improvement year on year of cases closed, the data indicates that this remains inadequate if IPPF wishes to effectively deliver swift, proportionate action on all cases, in accordance with the relevant policies and procedures, aligned with sector standards as the norm.
4. The Regional Incident Reporting Units did not operate as intended, which reduced the regional oversight of caseloads, exacerbated by the restructure, which saw a number of these staff leave the organisation.
5. The vast majority of Member Associations do not yet have systems, policies and processes adequately aligned with the IPPF Policy Handbook in place to achieve effective, quality investigations and other non-investigative proportionate actions.
6. Limited Human Resources staff across the secretariat has limited the progress of reported concerns that relate to Human Resources matters.
7. The lack of singular leadership accountability led to regional differences in approach and a lack of joined up planning and development of the resources and improvements required.
8. IPPF requires an Escalation Protocol to provide clarity and guidance that effects appropriate escalation of required cases **by** the right people **at** the right time, **to** the right internal and external stakeholders, e.g., donors, the UK Charity Commission etc.
9. An assessment of the amount of time ICs spends on managing cases would further support the provision of clarity about why cases in some locations do not progress at all, whereas in other locations, swift action is taken.
10. External Investigators are used to undertake audits and investigations – more in some regions than in others – relative it appears - to the number of cases in the system.

It is unclear what the total expenditure on investigations was in 2020 and whether any budget lines included these costs for 2021. Investigations will no doubt form a key area of work in the incident management function in all locations. If external investigators are to be central to our approach to the management of incidents, adequate budgets for the cost of commissioning this expertise will be required.

11. We have not yet formalised an organisation-wide approach to collecting data about lessons to be learned, sharing expertise across the Federation, and doing this important work in a systematic way. This will be addressed in 2021.

#### 4) Plans for 2021: an overview

In late 2020, the overall function of incident management was assigned to the Head of Safeguarding – who works closely with Regional Directors and ICs to support improvements.

The 2021 Workplan includes a range of deliverables that seek to deliver further improvements in response to the issues raised in this report.

This work will involve significant input, time and priority from relevant staff in all regions if the initiatives planned are to be successfully operationalised.

1. **Migration and operational roll out of IPPF SafeReport to a reporting system:** including better data capture (including equality monitoring information to support the anti-racism work underway), management information reporting of cases and the ability of ICs to keep the reporter at the heart of IPPF's response to concerns reported (March/April).
2. **Regional Incident Reporting Units will be reestablished:** to effect improved regional oversight of caseloads, lessons to be learned and standards of investigation and case management. (March/April)
3. **A new user-informed Incident Management Procedure to align with the new system:** supporting ICs to work to consistent timelines and standards, training provided and guidance developed (March/April).
4. **Set up of an Incident Coordinator Network:** to build and share understanding, expertise and as a route to the implementation of the process of learning lessons and implementing change to effect improvements (March/April).
5. **Development and implementation of an Escalation Protocol:** to effect timely and appropriate escalation of required cases **by** the right people **at** the right time, **to** the right internal and external stakeholders, e.g., donors, the UK Charity Commission etc. (February/March).
6. **Development of standards of investigation:** to improve consistency; used by IPPF staff involved in investigation and for commissioned external investigators (TBC).
7. **Quality Assurance:** trial of pre-closure checks on cases by subject experts (TBC).
8. **Support to HR colleagues:** to ensure IC work is adequately captured in the personal objective setting for all ICs, that enables effective performance management of relevant individuals and improvements to progression rates of all cases.

9. **Collaborative working:** on the work being undertaken to produce Fraud and Malpractice guidance and to the upcoming review of MA accreditation.

## 5) Conclusion

The last 12 months have seen improvement in IPPF's incident management work, with the majority of staff involved in this work, working hard to respond more swiftly and to improve the standards and consistency of this important work.

We still have a journey ahead of us and this work will require close monitoring to ensure we maintain and build on the good work done to date. Donors and other stakeholders increasingly look to us to meet their compliance and performance expectations in this domain.

As such, the plans to further develop resources, standards, and performance indicators will contribute to IPPF's improved performance.

Key areas to be further explored:

- What do we require and/or expect of our MAs in relation to the management of concerns arising about them?;
- How will we support MAs in appropriate cost-efficient ways to ensure they can contribute to global improvements in this domain?;
- How, as an organisation, we address the perception about the prevalence of Bullying Harassment and Victimisation at IPPF?; and
- How do we integrate the work of safeguarding into the antiracism work to build a culture of respect for all?