

Board of Trustees  
9-10 March 2022

Refers to  
agenda item 6a)

## Agenda Item: Safeguarding and Incident Management

### Summary:

This is the IPPF 2021 Annual Incident Management report, providing data, analysis and commentary on IPPF's Incident Management Work in 2021. Efforts continued to improve the way IPPF responds to concerns reported to IPPF SafeReport; our independent, confidential reporting service/incident management system. Those leading Incident Management focused on the lessons learned and reported in the 2020 Annual Incident Management Report and delivered successfully against the key priorities set for this reporting year.

### Key achievements:

1. **We received 45 new concerns in 2021 and closed 95 concerns:** which is a 53% improvement on 2020 closure performance and a 75% improvement on 2019 closure performance;
2. **Successful roll out of the new IPPF SafeReport system:** across the Federation with no loss of data;
3. **Introduced voluntary Equal Opportunities Monitoring to IPPF SafeReport:** for all reporters;
4. **Regional Incident Reporting Units re-established:** effecting some improvement to regional oversight;
5. **Development of an Escalation Protocol:** and improving escalation of new cases;
6. **Delivered specialist training to secretariat staff members:** including 28 staff trained as Incident Coordinators, some of whom were also trained as Regional Incident Response Unit (RIRU) Leads;
7. **Launched the new HUB:** providing secretariat staff and Members, Associate Members and Collaborative Partners (MA/Assoc/CPs), with access to resources and key information;
8. **Improvements to escalation processes:** actions on escalation and external reporting improved significantly since October 2021, policy to be implemented formally early in 2022, but actions happening in practice.

By the end of 2021, a total of 200 concerns were reported to IPPF SafeReport since its launch in December 2018. 165 of those concerns were concluded and closed, leaving 35 concerns open.

Of the 200 concerns reported, a total of 17 are safeguarding concerns. Following the discussion about the 2020 Annual Incident Management Report at a BoT meeting in 2021, a request was made to separate the data relating to non-safeguarding concerns from reported safeguarding concerns and include the safeguarding data and analysis in the 2021 Annual Safeguarding Report. This has been achieved, in terms of the separate review of our performance in managing safeguarding concerns. However, this and all future Annual Incident Management Reports will include data on reported safeguarding concerns, to ensure the overall Incident Management data remains consistent – across all six Primary Issue Types (PITs).

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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.

# 2021 Annual Incident Management Report

## 1) Reported Concerns

### Total caseload

By the end of 2021, a total of 200 concerns were reported to IPPF SafeReport since its launch in December 2018. Of the 200 reports received, 94 (47%) relate to MA/Assoc/CPs, 101 to secretariat offices (including global concerns) and five to our two hosted programmes; SheDecides and the Safe Abortion Action Fund (SAAF).

On 28 April 2021, the new IPPF SafeReport confidential reporting service went live, launched at a secretariat Town Hall meeting, followed by an electronic launch to all MAs/Assoc/CPs. The new reporting service was designed with a range of improvements.

One key improvement was the consolidation of issue types that can be reported; the old system had 22 Issue types. These have been consolidated to six Primary Issue Types (PITs), shown in Table 1 below. Each PIT has a list of associated subcategories.

**Table 1: Cumulative Global Total of Reported Concerns at 31 December 2021, by Primary Issue Type**

PIT	Cumulative Total 2021	MA/Assoc/CPs 2021	Cumulative Total 2020	MA/Assoc/CPs 2020
(1) Equality, Diversity and Inclusion	10	4 (40%) **	4	1 (25%)
(2) Employment and Work Place Matters	115	48 (42%)	94	36 (38%)
(3) Financial Wrongdoing	54	26 (48%)	43	20 (47%)
(4) Safety and Security	2	1 (50%)	1	1 (100%)
(5) Safeguarding*	17	13 (77%)	12	8 (67%)
(6) Info/Service Provision to Clients	2	2 (100%)	1	1 (100%)
<b>Total</b>	<b>200</b>	<b>94 (47%)</b>	<b>155</b>	<b>67 (43%)</b>

\* Discussed in the 2021 Annual Safeguarding Report.

\*\* All the figures in brackets e.g., 4 (40%) = of the cum total (10 in 2021 & 4 in 2020), 4 (40%) in 2020 & 1 (25%) in 2020 relate to MA/Assoc/CPs.

**Table 2** below, provides the number of secretariat staff and the number of MA/Assoc/CPs in each secretariat and the number of reported concerns received cumulatively to 31 December.

**Table 2: Regional Information: No. of Secretariat Staff, No. of Reported Concerns and No. of MA/Assoc/CPs**

Region	Sec. staff	No. of MA/Assoc/CPs	Cumulative to 31-12-21	Concerns Reported in 2021	Concerns Reported in 2020	Concerns Reported in 2019
ACR*	13	17	6 (5) **	2 (1)	1 (1)	3 (3)
AR	77	40	66 (46)	15 (12)	31 (19)	20 (15)
AWR	19	18	70 (18)	13 (6)	21 (5)	36 (7)
London (Central Office)	87	0	9 (NA)	0 (NA)	6 (NA)	3 (NA)
EN	25	33	7 (5)	3 (2)	2 (2)	2 (1)
ESEAOR	31	25	18 (14)	6 (5)	9 (6)	3 (3)
SAR	25	8	13 (6)	3 (1)	5 (3)	5 (2)
Global	NA***	NA	6	0	4	2
Hosted Progs.	NA***	NA	5	3	2	0
<b>Total</b>	<b>277</b>	<b>141</b>	<b>200 (94)</b>	<b>45 (27)</b>	<b>81 (18)</b>	<b>74 (31)</b>

\* ACR: includes WHR data to ensure accuracy of cumulative data.

\*\* All the figures in brackets e.g., 6 (5) means of the 6 concerns reported, 5 relate to MA/Assoc/CPs and 1 relates to the secretariat.

\*\*\* Staff numbers for hosted programmes and global entities are included in the figures given for each secretariat office.

### Most Common Primary Issue Type (PITs)

Table 3 below shows the top three PITs reported. The first two; Employment and Work Place Matters and Financial Wrongdoing, have remained in the top three since 2019. There has been more focus on Financial Wrongdoing concerns in the last six months and, under new leadership this will continue in 2022.

Work being done by the global HR Community, including salaries and benchmarking, and new initiatives in 2022, look likely to positively impact the prevalence of concerns reported about Employment and Work Place Matters.

In the previous year, 2020, the third most common concern was Bullying Harassment and Victimization (BHV). This was replaced by Safeguarding in 2021, when BHV became a subcategory of Employment and Work Place Matters.

**Table 3: Top 3 PITs**

PIT	Concerns reported in 2021 (%)	Concerns reported in 2020 (%)	Concerns reported in 2019 (%)
<b>(2) Employment and Work Place Matters</b>	<b>115 (57.5%) *</b>	<b>94 (61%)</b>	<b>40 (54%)</b>
<b>(3) Financial Wrongdoing</b>	<b>54 (27%)</b>	<b>43 (28%)</b>	<b>25 (34%)</b>
<b>(5) Safeguarding</b>	<b>17 (8.5%)</b>	<b>12 (8%)</b>	<b>5 (7%)</b>

\* All the figures in brackets shows the % of the total caseload of 200 reported concerns.

## 2. Closure Status and Outcomes

**Closure status at 31 December 2021:** the cumulative total of concerns reported stands at 200 and the closed concerns at 165. 35 remain open, of which 11 (31%) were reported in 2020 and 24 (69%) in 2021. An impressive 95 concerns were closed during 2021. In addition to closing 21 concerns reported in 2021, we closed 74 from the backlog; 44 (46%) from 2020 and 30 (32%), from 2019.

This is a 53% improvement on 2020 case closure performance and 75% on 2019.

**Table 4: Reported Concern Closure Rates over the last 3 years**

Year	Cumulative Total	Cum closed (No. of MA/Assoc/CPs)	% of total case load closed at year end (% of MA/Assoc/CPs)
<b>2019</b>	<b>74</b>	<b>5 (1) *</b>	<b>7% (1% of MA)</b>
<b>2020</b>	<b>155</b>	<b>70 (23)</b>	<b>45% (15% of MA)</b>
<b>2021</b>	<b>200</b>	<b>165 (68)</b>	<b>82.5% (34% of MA)</b>

\* All the figures in brackets e.g., 5 (1) of the 5 concerns closed, 1 relates to MA/Assoc/CPs and 4 relate to the secretariat.

This was achieved through a range of initiatives including: Allocating of overall responsibility for Incident Management to a dedicated role (Head of Safeguarding); increased focus on the leadership and accountability of regional performance by senior management; and development and delivery of mandatory training and resources for staff responsible for Incident Management.

In respect of reported Financial Wrongdoing concerns, one of our high-risk areas, a key contribution to the performance improvement in closure rates and the quality of responses those cases, was the support provided by our auditors, and significantly, the appointment of the new Director, Risk and Assurance in October.

The improvements achieved with their support and diligence will continue to create increasing confidence of our stakeholders in IPPF's Financial Wrongdoing prevention and management through continued, internal support and scrutiny by subject experts allocated responsibility or this work.

One area that was originally identified in 2020 as a weakness, was the ability of MA/Assoc/CPs to effectively and compliantly manage reported concerns that arise, and this has continued and noted in the audit report. This has been of particular concern in relation to Financial Wrongdoing concerns. The Director, Risk and Assurance has this in his sights and significant work has been achieved to redress this issue, to be further developed in 2022. Separate reporting for Financial Wrongdoing concerns, as we have provided for Safeguarding concerns, is being considered, to facilitate improved governance oversight and transparency.

Similar challenges have arisen, albeit on a much smaller scale, in respect of the capacity of IPPF's two hosted programmes to align adequately with IPPF's policies and incident management processes. This has raised the need for hosting agreements to be reviewed in respect of these issues and guidelines/requirements for hosted programmes will be developed.

In late Q3 2021, our internal auditor, RSM, completed the commissioned audit of our Incident Management and Safeguarding Functions. The Audit was completed in Q4 and noted:

*'Improvements have been made in the last year and these include the launch of a new SafeReport system with increased functionalities and the creation and training of a pool of Regional Incident Reporting Unit (RIRU) leads and Incident Coordinators (IC's) from across the Regional Offices. Whilst these are positive steps and provide a foundation for an effective incident management framework, additional action is required to enhance the design of processes and associated controls to strengthen compliance requirements and further embed processes across the Federation. This could include the formal assignment of responsibilities and accountabilities, activities to embed behavioural change and ongoing checks to monitor compliance with processes. In addition, there are gaps in record-keeping held on SafeReport and non-compliance with the incident management process'.*

The Auditor confirmed it could provide:

*'Reasonable' assurance that the controls upon which IPPF relies to manage this area are suitably designed, consistently applied or effective. It noted that urgent action is needed to strengthen the control framework to manage the identified area'.*

**Outcomes at 31 December 2021:** The analysis of closure outcomes e.g., a notable increase in the number of substantiated outcomes, as compared to other outcomes, must take into account the variables arising from six different PITs, seven Secretariat offices, two hosted programmes and 141 MA/Assoc/CPs.

As such, it is not possible to accurately determine any trends or patterns to accurately relate to outcomes. However, it is likely that the overall decrease in the number of reported concerns year on year and an increase in the number of substantiated closure outcomes, points to a reduction in the number of malicious reports being raised, and a growing confidence in our response processes and standards of investigation.

**Table 5: Outcomes of Cases Closed by Outcome Category and by year**

Year	Outcomes of closed cases by each year end (reported in any year)				
	Substantiated	Unsubstantiated	Partially Substantiated	Retracted	No response from reporter
2021	64 (39%) *	72 (44%)	19 (11%)	8 (5%)	2 (1%)
2020	18 (26%)	45 (64%)	4 (6%)	3 (4%)	0
2019	3 (60%)	2 (40%)	0	0	0

\* All the figures in brackets shows the % of the total caseload of the total caseload of 200.

**Table 6: Outcomes of the most frequently reported concerns**

Outcomes of the most reported concerns (by PIT - cumulative)					
Primary Issue Type	Closed at 31-12-21	Substantiated	Unsubstantiated	Partially Substantiated	Other
(2) Employment and Work Place Matters	97	32	45	14	6
(3) Financial Wrongdoing	45	20	20	5	0
(5) Safeguarding	13	9	2	0	2

## Key Take-Aways

- the performance rate of case closure has improved by 53% compared to 2020 and 75% to 2019;
- while we have achieved impressive, evidencable improvements, the Safeguarding and Incident Management Audit provides a list of urgent management actions for progression in 2022;
- the audit report management actions have been agreed and some have already been progressed to conclusion. Others will be developed to agreed timelines and progress will be reported to C-FAR and the BoT in the 2022 Quarterly and Annual Safeguarding and Incident Management Reports;
- when attempting to analyse the closure outcomes of reported concerns, the multifarious variables, i.e., six different PITs, seven Secretariat offices, two hosted programmes and 141 MA/Assoc/CPs, present a major challenge in identifying the reasons for outcomes trends and patterns;
- an increase in substantiated outcomes, most likely points to an increase in the awareness of the reporting service, improved *identification* of the different issues that can be reported; an increase in *confidence* in our reporting service, and/or improvement in the *quality* of investigations and oversight by subject experts;
- it remains a challenge for MA/Assoc/CPs to progress and close concerns effectively and compliantly;
- reporters share that they want to be informed *what* action was taken when a concern they reported was substantiated; worth considering whether we *can* and how we *might* do this, within the boundaries of confidentiality, appropriateness and the agreed standards and policies already in place. It is important to recognise that we have looked at this previously and for clarity, there is no doubt; we cannot provide the information on a case by case basis. However we can look at the feasibility/ risk of providing aggregated information.

## 3. Lessons

As noted earlier in this report, IPPF is yet to complete the design and implementation of a formal process for capturing lessons to implement improvements to our incident management work. The first priority, which was successfully achieved on 28 April when the new SafeReport system went live, was to ensure we could collect data and information on lessons learned on every reported concern. This is now part of the pre-closure mandatory actions required before any concern can be closed.

This will contribute to the development of a new approach to lessons learned, to be achieved in 2022. While we need to create this process and ensure it becomes a regular exercise, where lessons have been clearly identified, improvements are being implemented. We have also created the ability and requirement for Incident Coordinators to log data on financial losses, as requested by the C-FAR in 2021.

A Lessons Learned review of a significant historical case in the Africa region was undertaken by the Head of Safeguarding. Four key lessons were identified which, in summary, relate to weaknesses in two areas of incident management and safeguarding: the absence of a fit for purpose *framework for safeguarding investigation and incident management*, resulting in our failure to *adhere to sector standards*.

It is important to note that this review relates to a *historical* case which was investigated *before* the implementation of IPPF's Safeguarding Framework and all the subsequent work and successes achieved. Any specific lessons not yet addressed, will be included in work priorities for 2022.

### Lessons from 2021 casework

**Lesson:** we have identified that Incident Coordinators, who have responsibility for progressing and preparing concerns for closure, need further support and guidance on identifying lessons, for a number of reasons.

**Lesson:** the audit report identified the need to improve the way that responsibilities relating to Incident Management are formalised in Job Descriptions and related HR documentation:

*'While a clear process for and clarity about incident management responsibilities has been created, implemented and staff trained, the degree to which these are being fulfilled by the designated staff is poor - both centrally and at a regional level, hindering the compliance of the robust and effective incident management process created.'*

*Responsibilities and accountabilities have not been agreed and communicated in designated staff Job Descriptions, annual objectives, and performance reviews’.*

**Lesson:** improvements are required to the standards of investigation, record keeping, and the use of external auditors and investigators.

**Lesson:** we have identified that a review of IPPF’s Funding Agreement documentation needs to be undertaken. This is to ensure these are adequately and proportionately clear about the incident management (and safeguarding) related clauses, enable IPPF, as a registered charity, to fulfil its compliance requirements, placed upon it by the Charity Commission and our various donors. This work will be progressed in 2022.

## 4. Conclusion

We have significantly improved our performance on Incident Management Work in 2021. The closure rate improvements of 53% and 75% are worthy of note and recognition. When compared to our 2020 and 2019 performance, the status of this work, the growth in skills, knowledge and competency and the continuous improvements we have achieved, against the backdrop of Covid and many other operational and funding challenges and huge staffing change following the restructure, has been positive, and successful.

We still have urgent management actions and improvements to make and must continue to upskill our staff, embed the principles and best practice required across the Federation, and will need to be innovative in how we do this against the funding challenges IPPF, like so many organisations face.

## 5. Key Priorities for 2022

Work in 2022 will focus on a range of key priorities, which will be monitored for progress. These are high level initiatives and do not represent the detailed workplan for 2022.

Action	Target completion
Complete Management Actions from the RSM Safeguarding & Incident Management Audit Report.	Q1
Completion and implementation of a formalised process for learning lessons from our casework with input from subject matter experts, including guidance for staff on recording lessons effectively.	Q2
Undertake a review of IPPF SafeReport to identify any necessary changes required.	Q3
Complete a review of the Core Funding Agreement through the lenses of our Safeguarding, Financial Wrongdoing reporting compliance responsibilities.	Q3
Produce and disseminate a report on lessons learned from casework	Q4
Develop and implement guidance with subject matter expert input to increase the competence and confidence of Incident Coordinators	Q1-Q4
Achieve a measurable improvement in the time taken for concerns to be closed	Q4

### KEY TO ACRONYMS

<b>ACR</b>	Americas and the Caribbean Region
<b>AR</b>	Africa Region
<b>AWR</b>	Arab World Region
<b>BoT</b>	Board of Trustees
<b>C-FAR</b>	Finance, Audit and Resources Committee
<b>DLT</b>	Directors Leadership Team
<b>EN</b>	European Network Region
<b>ESEAOR</b>	East and Southeast Asia and Oceania Region
<b>IC/ICs</b>	Incident Coordinator/s
<b>IM</b>	Incident Management
<b>MA/Assoc/CP</b>	Member Association/Associate Member/Collaborative Partners
<b>PITs</b>	Primary Issue Type