



# **Independent Child Safeguarding Review Global Report**

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## 1. List of acronyms

SOS CV	SOS Children's Villages
SOS CVI	Children's Villages International
GSC	General Secretariat
ICSR	Independent Child Safeguarding Review
IO	International Office
IOR	International Office Region
KCS	Keeping Children Safe
MA	Member association
NA	National association
NO	National office
PSA	Promoting and supporting association
PSEAH	Preventing Sexual Exploitation, Abuse and Harassment

## 2. Executive Summary

The Independent Child Safeguarding Review (ICSR) was commissioned by the International Senate of SOS Children's Villages (SOS CV) to find ways to address the complex topic of historical abuse. As part of the ICSR, historical cases of abuse that took place at and around SOS Children's Villages in four countries in different regions of the world were reviewed over a period of four years. This global report sets out consolidated findings and recommendations from the four country reviews with the aim of contributing to improvements in safeguarding practice.

It is important to note that this report only offers learnings from four country case reviews where there have been historical failures in safeguarding and cannot be regarded as a review of the organisation as a whole, either in the past, or as an assessment of the current situation. The ICSR team is aware of excellent and often ground breaking child safeguarding initiatives across the organisation; however, they are not the focus of this report.

As an alternative care service provider, SOS CV carries a particularly high child safeguarding risk profile. A key finding of the ICSR is that during the timescale considered by the review, SOS CV did not adequately consider and mitigate child safeguarding risks and therefore exposed children to abuse. Substantial gaps in the available case files mean that a great number of questions about the abuses remain unanswered including the total number of victims and survivors and the type of abuses they were subjected to, or a complete picture of how the organisation responded in each case.

As well as child abuse, the review was provided with evidence of serious abuse of whistle-blowers and SOS primary caregivers who reported abuse.

The ICSR found substantial evidence of failures of safeguarding in all country case reviews, as well as bullying, discrimination, abuses of power and concerns of nepotism reported within SOS right up to the most senior levels. Such a culture enables abuses of power and powerfully inhibits reporting safeguarding concerns. What is absolutely clear from the evidence, is that there were grave and prolonged organisational failings, and in a significant number of incidents, there is no evidence that perpetrators operated with anything other than functional impunity.

Many of the incidents reviewed appear to have occurred before the launch of the SOS Child Protection Policy in 2008 or Code of Conduct in 2011. This review found that since then and particularly since 2012, when practical child safeguarding procedures started to be put in place, significant progress on child safeguarding has been made across the federation, led by skilled and tenacious child safeguarding professionals, in often challenging circumstances. Including: more targeted prevention efforts, increasing the capacity of internal child safeguarding investigators and improving reporting and responding procedures across the federation.

A notable strength of SOS CV is its' willingness to learn from past mistakes and adapt policies, procedures and practices accordingly, with many such new initiatives developed based on learning from the cases considered by the ICSR. This report makes recommendations on how SOS Children's Villages can build on this progress to continue to strengthen safeguarding of children and young people across the organisation and further mitigate the risk of the safeguarding failures reviewed in ICSR focus countries reoccurring.

Key areas for improvement are identified in the following areas:

1. Child Safeguarding measures within SOS Children's Villages International
2. Leadership and organisational culture
3. Oversight, governance and accountability
4. Care quality and the role of primary caregivers
5. Justice and support for victims, survivors, and whistle blowers

### 3. Introduction

The Independent Child Safeguarding Review (ICSR) was commissioned by the International Senate of SOS Children's Villages to find ways to address the complex topic of historical abuse. This includes ways to support victims on their path towards healing and to ensure organisational learning with a view on programmatic improvements. As part of the ICSR, historical cases of abuse that took place at and around the SOS Children's Villages in four countries in different regions of the world (Africa, Asia and Latin America) were reviewed over a period of four years.

This global report sets out consolidated findings and recommendations from the four country case reviews, which may be relevant to a global audience, with the aim of contributing to improvements in safeguarding practice within SOS Children's Villages and the alternative care sector more broadly.

This ICSR sought to understand contemporary practices from the viewpoint of individuals and organisations who were involved at the time. It was not an investigation into historical child abuse concerns but is instead a review set up to better understand what contributed to the occurrence of alleged child abuse in selected cases, how the organisation responded and what lessons can be learned for the larger organisation from such events. Therefore, the contents of this report should not be taken as an implication or proof of the actions of any individual or of the facts of any particular event or circumstance. The aim is to continue reducing risks in SOS Children's Villages programmes today and improving current child safeguarding work for the future.

It is important to note that the ICSR only offers learnings from four country case reviews where there have been historical failures in safeguarding and cannot be regarded as a review of the organisation as a whole, either in the past, or as an assessment of the current situation. The ICSR team is aware of excellent and often ground breaking child safeguarding initiatives across the organisation, led by dedicated and experienced child and youth care professionals working in often challenging contexts with children and young people with complex needs in extremely vulnerable circumstances, however they are not the focus of this report.

This report does reference the global progress made across SOS Children's Villages in child safeguarding, much of which was informed by the learning from those cases, in order to show how some identified gaps in safeguarding have already been addressed and to make recommendations appropriate to the present day.

#### **Confidentiality**

Respect for confidentiality is a key principle of child safeguarding. Information should only be shared on a 'need-to-know' basis to: i) safeguard victims and survivors, as well as Subjects of Complaints, witnesses, investigators, and other individuals from risks of harm and ii) prevent potential investigations being compromised. It is for this reason, that the details of each case and including specific locations are anonymised in this report.

### Note on terminology

When this report refers to SOS Children’s Villages (or SOS CV), it is referring to the organisation in general terms; when it refers to SOS Children’s Villages International (or SOS CVI) it may be referring to the General Secretariat, or the governing bodies of SOS CVI, namely the International Senate and the General Assembly.

Unless further specified, when it refers to the General Secretariat (or GSC), it is referring to the International Office (IO) and International Office Regions (IORs).

When it refers to a member association of the federation of SOS Children’s Villages, it describes a member association or the operations in a country (if said operations are run by the GSC rather than as an independent association).

## 4. Review team

The Independent Child Safeguarding Review was conducted by Keeping Children Safe (KCS). Keeping Children Safe is an independent not-for-profit. KCS sets out internationally recognised child safeguarding standards that ensure all organisations working directly for and with children have comprehensive safeguarding measures in place. KCS’s independence means that its standards and advice are not influenced by any other organisation or government. Keeping Children Safe’s core mission is to make sure children everywhere are safe from harm.

## 5. Objectives of the ICSR

The **Objectives** of the ICSR were:

- 1) To provide insight into past and current child safeguarding practices of SOS Children’s Villages International and its federation of member associations by looking into four historical child safeguarding cases.
- 2) To identify and promote the lessons learned from historical and current child safeguarding practices to implement child safeguarding efficiently throughout the federation of SOS Children’s Villages International.
- 3) To support member associations to strengthen their ability to respond to historical abuse allegations and effectively safeguard children in their care today.

## 6. Methodology

The central Practice Research Question was: *“What can SOS Children’s Villages learn from four historical child safeguarding cases to better prevent, report and respond to the abuse of children and young people in their care?”*

Four Research Sub-Questions informed the ICSR outcomes. These included:

1. What abuse did children and young people experience, how was it reported, how was it responded to and did anything change as a result?
2. In what ways did the environment in which children and young people lived expose them to a higher risk of abuse?
3. What factors influenced if and how children, young people, SOS staff and other people reported the incidents of abuse in the country case?
4. What factors influenced the way SOS Children's Villages responded to the incidents of abuse? Directly or more structurally?

Six distinctive reporting categories were utilised:

1. Physical environment of children and young people – proximity of violence to SOS families; physical location of SOS families in relation to community;
2. Socio-cultural environment of children and young people – autonomy of SOS mothers in SOS family decision-making; child participation in SOS families; role of children and women in community; cultural/societal taboos of violence against children;
3. Legislative and political environment of country – change of relevant legislation during review period; rule of law;
4. Policies and (formal and informal) practices of Member Associations – relevance of policies and practices for Member Associations and programmes to address existing child safeguarding risks;
5. Child safeguarding responsibilities in Member Associations – oversight of programmes by national board availability of relevant training opportunities; people of trust to whom children can turn; and
6. Child safeguarding responsibilities in General Secretariat and with other federation stakeholders – oversight over programmes and operations by General Secretariat; cooperation between General Secretariat and Member Association.

A multi-method approach was employed beginning with a review of historical abuse case documentation, followed by then key informant briefings.

### **Desk Review**

The ICSR Team interrogated the documentation relating to each case using the research frame and matrix of research sub-questions and six categories to ensure that the results were comparable and measurable across four reviews.

Documentation included:

- documentation relating to a number of specific child safeguarding incidents which occurred at the SOS Children's Villages
- documentation relating to the organizational response on different organizational levels, as well as governmental interventions, to these specific child safeguarding incidents, as well as other issues
- a review of child protection laws and practices in each country

The desk review informed the approach and direction of the wider research. It identified key issues and areas for further examination and formed the basis for deriving a list of relevant stakeholders and informants. Robust confidentiality, data storage and document sharing protocols were adhered to throughout the process.

### **Research with key stakeholders**

The ICSR Team drafted a range of survey questions and specific interview guide containing mostly open-ended questions for each interview (semi-structured) and also used in unstructured interviews where the interviewer begins with a general sense of the topics to be discussed and creates questions as the interaction proceeds. The interviewers used probes to enable participants to elaborate further on their comments.

Respondents were conveniently selected from all levels and functions of the organisation to allow the ICSR Team to swiftly gather information from those who are known to have stories about incidents of alleged abuse, perhaps witnessed, or were told about the cases without the complications of using randomized sampling. The information was analysed using content analysis method to identify trends, patterns, and relationships of emerging themes from the historical child safeguarding cases. This was presented in a preliminary report.

Feedback on the preliminary reports were collected in writing as well as in a face-to-face learning workshop in two countries. For the other two, in-country research was not possible due to the Covid-19 Pandemic therefore an adapted methodology was used. A comprehensive online survey was developed for a wide range of stakeholders followed by individual virtual interviews and where relevant, focus group interviews of a semi-structured or unstructured nature.

The key findings and recommendations relevant to a global audience were consolidated from all country cases, alongside additional supplementary information from key stakeholders to produce the global ICSR report.

## 7. Findings and Recommendations

SOS Children's Villages child and youth care professionals work with almost 65,600 children and young people in alternative care programmes and 1112,600 children, youth and adults in other programmes in 126 countries and territories around the world. Whilst children are abused in all context, including biological families, as an alternative care service provider, often for children in extremely vulnerable circumstances, the organisation carries a particularly high child safeguarding risk profile. A key finding of the ICSR is that during the timescale considered by the review, SOS CV did not adequately consider and mitigate child safeguarding risks and therefore exposed children to abuse and child rights violations in the ICSR focus cases.

Specifically, the ICSR found evidence that children were abused in the care of SOS Children's Villages in the four country cases reviewed. The incidents included all types of physical, sexual and emotional abuse (resulting in girls becoming pregnant), sexual exploitation, grooming, neglect (including delay or failure to report missing children) child to child abuse, and other rights violations such as a failure to provide education or appropriate standards of care, such as a safe environment with adequate water and sanitation, removal of caregivers, removing care for pregnant girls, and 'exiting' of youths without suitable support often as a form of punishment or reprisal for reporting abuse.

Substantial gaps in the available case files mean that a great number of questions about the abuses remain unanswered. This includes the number and situation of the victims and survivors and the type of abuses they were subjected to, or a complete picture of how the organisation responded in each case. When abuse was reported, in many cases, there was very little to indicate that a victim/survivor centred approach was taken, or that children received appropriate support or accountability from the organisation. A priority recommendation of this review is that:

### **7.1 SOS Children's Villages International and member associations should prioritise the best interests of victims and survivors of abuse including historical abuse, and guarantee appropriate high-quality support and remedies to all without exception.**

Children risked reprisals as well as losing their homes and SOS families by reporting abuse. Children and young people were particularly at risk in countries where child and social protection systems are weak, in conflict and crisis situations and if they had no other sources of support.

As well as child abuse, the review was provided with evidence of serious abuse of whistle-blowers and SOS primary caregivers who reported abuse. Many of whom lost their homes and SOS families and livelihoods, trying to protect children from harm. This appears to have been enabled by a patriarchal and hierarchical organisational culture, which tolerated disregarding children's rights, victim-blaming, bullying, nepotism, cover-ups, and collusion at all levels of the organisation. Informants to the country case reviews described a serious

failure of oversight and governance on safeguarding within a system of unaccountable ‘fiefdoms and chiefdoms’ led by powerful individuals, about whom few dared complain.

The review found that these factors, combined with an inadequate reporting and responding mechanism, profoundly impacted the way in which children and adult witnesses reported abuse, as well as the ways in which SOS Children’s Villages responded to the abuse. What is absolutely clear from the evidence, is that there were grave and prolonged organisational failings, and in a significant number of incidents, there is no evidence that perpetrators operated with anything other than functional impunity.

Justice and accountability are crucial aspects of human rights and of child rights. Acknowledging and accepting that abuse has occurred and that restorative efforts are required to enable young people with histories of abuse to achieve emotional closure is critical. Priority recommendations of this review are that:

**7.2 Where evidence of wrongdoing exists SOS Children’s Villages should conduct an exhaustive, transparent, and independent investigation without fear or favour as a matter of urgency.**

**7.3 There should be a zero-tolerance approach to abuse with swift and proportionate sanctions for perpetrators, whenever that abuse occurred.**

**7.4 To ensure the integrity of the investigation, no person with a conflict of interest in the incident should be involved in the investigation process, or in decisions about accountability. Evidence of wrongdoing by individuals still working at SOS CV should be prioritised for investigation, particularly if they have direct contact with children or are in positions of power and authority.**

### **Progress on child safeguarding in SOS Children’s Villages**

Many, although not all, of the incidents reviewed appear to have occurred before the launch of the SOS Child Protection Policy in 2008 and the development of the Code of Conduct in 2011. This review found that since then significant progress on child safeguarding has been made across the federation, with many such initiatives developed based on learning from the cases considered by the ICSR.

A notable strength of SOS CV is its willingness to learn from past mistakes and adapt policies and procedures accordingly. The process of developing the child safeguarding framework has been led by committed, skilled and extraordinarily tenacious professionals in the Child Care and Safeguarding Team and across the federation and the ICSR is part of that development.

In 2010, the first guiding documents on managing child protection incidents and concerns, the SOS Children’s Villages Child Protection Reporting and Responding Procedures and associated tools and resources, were developed and released. Member associations formed

Child Protection Teams in all continents and focused on training critical national staff who would oversee the implementation of the Child Protection Policy. Awareness raising and capacity building has been undertaken including the development and strengthening of global and regional child safeguarding networks.

Since 2013 the Care and Child Safeguarding team regularly report to the Chief Operating Officer (COO) on child safeguarding incidents where the General Secretariat (GSC) of SOS Children's Villages gets involved. The GSC gets involved with child safeguarding incidents when member associations require additional support to manage the incident, when the GSC wants to monitor the response to the case, such as sexual abuse, and when there is a possible conflict of interest that requires the incident to be managed from outside the member association. Similar lines of reporting are also in place within regional offices. These reports are shared with the Management Council as well as the Senate Programme Audit Committee where child safeguarding is a standard agenda item.

In March 2015, the Management Council approved the policy support document "Working together to protect children. GSC roles and responsibilities in child protection reporting and responding" which defines the roles and responsibilities of concrete functions in the GSC in the reporting and responding process. In March 2016, the Management Council approved a new policy support document "Child's safety is everybody's business. Child safeguarding reporting and responding procedures in member associations". In March 2016, the Management Council approved a new policy support document "SOS Children's Villages Child Safeguarding Investigations". Child safeguarding risk assessments were introduced as a minimum requirement across the federation that same year.

In 2017 SOS Children's Villages achieved Level 1 certification<sup>1</sup> by Keeping Children Safe. The certification process is an external audit to measure the extent to which a child safeguarding framework is in place.

Child safeguarding audits were introduced as a tool to monitor compliance to the Child Protection Policy and related policy support documents to determine whether the relevant procedures are in place and well implemented. An annual child safeguarding report is prepared by the Child Care & Safeguarding team report for the Management Council and the Programme Audit Committee. This report is based on the results of the annual child safeguarding survey and an analysis of the child safeguarding actions and developments during the year. Since 2018, Annual Child Safeguarding reports have been published externally.

The Child Safeguarding Incident Platform was created in 2019 to provide anonymised updates on child safeguarding incidents where the GSC gets involved. Furthermore, SOS Children's Villages has established a global pool of 20 certified child safeguarding investigators from all regions. All investigators receive annual enhanced capacity building to ensure that they can lead complicated investigations in often challenging contexts where authorities are unable or unwilling to conduct such investigations. Extensive efforts have been made to strengthen

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<sup>1</sup> Level 1 Certification does not assess implementation of that framework.

prevention initiatives in all the regions through care networks active in Africa, Asia, Middle East, Central and Eastern Europe and the Commonwealth of Independent States (CEE/CIS), and Latin America and the Caribbean. Including training on such topics as:

- Protective behaviours
- Trauma-informed care
- Positive parenting and discipline
- Realising Children's Rights
- Guidance on Problematic Sexual Behaviours and Abusive Sexual Practices
- Star C an initiative creating self-training opportunities for children on child rights through games.

The following section sets out how SOS Children's Villages can build on this progress to continue to strengthen safeguarding of children and young people across the organisation and further mitigate the risk of the safeguarding failures reviewed in ICSR focus countries reoccurring.

## Child safeguarding measures within SOS Children's Villages International

At present, wholly insufficient resources are assigned to overseeing child safeguarding (building capacity, setting standards and providing a framework in which line management can be held to account on fulfilling their safeguarding responsibilities) responding to incidents, or prevention work, for an organisation directly serving 65,600 children and young people in alternative care programmes, an additional 347,000 children, young people and adults in programmes to prevent family separation, 525,600 children, young people and adults in education, health and other programmes, and approximately 240,000 children, young people and adults in emergency response programmes.

Staffing levels at the General Secretariat, which is responsible for implementing strategic decisions taken by SOS CV's General Assembly and International Senate, and developing and monitoring federation quality standards, offer some insight. For example, there are at present 11 dedicated, technical FTE for child safeguarding at IO and IORs. Internal child safeguarding audits are carried out by the child safeguarding staff. Limited capacity to work in different languages was identified as a particular concern for the IO team, as well as the capacity to audit and respond to serious cases referred.

Significantly more resources are dedicated to protecting money. There are 7.3 dedicated FTE at IO and IORs to deal with corruption cases including reporting and incident management and 10 FTE for internal audit which includes financial audits and cross-functional audits. Yearly financial audits are carried out by external firms.

Child safeguarding is skilled, emotionally demanding work requiring careful evidence-based decisions and the willingness and courage to speak truth to power. In addition to the challenges of dealing with potentially distressing incidents of abuse, child safeguarding professionals within SOS CV have faced bullying and intimidation. In some instances, staff workloads have been unsustainably high, their work has been obstructed and their advice disregarded. If this remains unaddressed, there is a high risk that such individuals will experience vicarious trauma and burn-out. Particularly since relevant professional supervision and/or psychosocial support is not systematically offered to safeguarding staff.

### **Recommendations:**

**7.5 Adequate resources should be dedicated to context-specific, culturally sensitive child safeguarding across the Federation. In the GSC (both IO and IORs). These should be assigned based on the needs identified in a comprehensive risk assessment. As an absolute minimum, SOS CV should prioritise protecting children at least as much as it prioritises protecting financial resources.**

**7.6 Ensure all staff in the member associations and the GSC involved in managing incidents undertake specific case management training.**

**7.7 Ensure relevant professional supervision and/or psychosocial support is offered to all SOS CV safeguarding staff.**

The review found that individuals at all levels including the most senior in many instances, had failed to cooperate with, undermined, or indeed actively argued against safeguarding investigations including, discrediting, bullying, and abusing whistle-blowers, investigators, and safeguarding staff.

**Recommendation:**

**7.8 The SOS CV Child Protection Policy and code of conduct requires an urgent review to include specific roles and responsibilities at all levels as well as to include a provision that any individual found to have failed to report a safeguarding concern, failed to cooperate fully, or obstructed an investigation in any way will face sanctions.**

A particularly serious gap is that staff involved in managing incidents have not all undertaken specific case management training and there is no consistent system for case management and record-keeping across member associations and the GSC. Without clear and comprehensive record keeping, it is impossible to ensure the quality of incident response. Reports may not be adequately addressed, victims and survivors may be denied access to justice and support, staff who cover-up reports or fail to report abuse might not face sanctions and perpetrators may remain free to abuse more children.

A further consequence is that, the organisation will not be able to adequately review how cases were managed to identify failings and improve practice. In one of the ICSR country cases the team made repeated requests for case files a period over two and a half years. During this time over 3000 documents and 30 hours of audio files were provided in two languages, none of which were organised into case files and some of which only arrived after the draft report was shared for feedback. The sheer scale and complexity of the evidence, and the lack of consistency in record keeping, meant that the review was unable to conclusively identify the total number of victims or develop a clear picture of the organisational response. Similar gaps in record keeping were observed in the other country case reviews.

**Recommendation:**

**7.9 A detailed case management system must be developed by the GSC and implemented by member associations as a matter of urgency. Detailed records of each case and the SOS CV response must be maintained without exception. The GSC should ensure regular audits are conducted to ensure standards are met.**

The failure to systematically consult children on the development and evaluation of safeguarding measures means that they will be less effective. For example, in one ICSR case no information was provided to children about the right to report and the main reporting mechanism, a complaints box, was located in a prominent location in sight of the offices of the alleged perpetrator ensuring that children could not report anonymously. According to the child safeguarding annual survey 2019, 49 member associations fully met the requirement

to consult with children, young people, primary caregivers, and communities on the development and evaluation of safeguarding measures and another 57 member associations met it only partially.

**Recommendation:**

- 7.10 Member associations, supported and monitored by the GSC, must ensure that communities, children, and victims /survivors are systematically involved with the creation and implementation and monitoring of safeguarding measures, accountability structures and wider programmes in order to ensure that these are context-specific, appropriate to the needs of children and accessible to all.**

Child safeguarding is not mentioned in the global HR policy and procedures. There is no overarching document that outlines in detail the specific safeguarding roles and responsibilities of staff at all levels, and individual safeguarding responsibilities are not systematically assessed as part of recruitment, performance management and appraisal processes.

**Recommendations:**

- 7.11 The global HR policy and procedures should be urgently and independently reviewed to ensure appropriate safeguarding is incorporated and becomes mandatory across the Federation. This should include stringent procedures to prevent conflicts of interest. Any individual with a conflict of interest in a safeguarding investigation should be disqualified from decision-making about accountability measures. This should include board members of member associations as well as SOS CVI.**
- 7.12 The GSC and member associations must ensure individual safeguarding responsibilities are assessed as part of recruitment, performance management and appraisal processes, with staff required to understand and model organisational values and appropriate behaviour at all times.**
- 7.13 All SOS CVI and member association senior management and board members should be required to complete a conflict-of-interest form on recruitment and again annually. Failure to do so, or failure to declare any conflicts of interest should result in disciplinary action including removal from the position. Specific procedures should be developed to manage conflicts of interest in line with local laws.**

## Child safeguarding, leadership, and organisational culture

Organisational culture and leadership are critical to effective child safeguarding and this review found that the majority of staff involved in the country case reviews conducted themselves with dedication, care, respect and integrity, in often challenging circumstances.

However, the ICSR found substantial evidence of bullying, abuses of power and concerns of nepotism reported within SOS CV right up to the most senior levels. Informants described widespread discrimination against women and girls, a culture of victim-blaming and in some cases 'colonialist attitudes and approaches'. Both at the time of the incidents in the case reviews, and the present day. Such a culture enables abuses of power and powerfully inhibits reporting of safeguarding concerns.

For example, in one country the organisational culture was described as 'a kingdom and a family', with most interviewees expressing very strong emotions of fear, anxiety, silence, fear of job loss for speaking out, and feeling powerless. In another country, interviewees described some staff as 'untouchable' and reported a culture of 'cover-up and collusion'. One senior regional manager was, according to an interviewee, 'chosen by the founder, untouchable'.

In another example it appears that a senior national manager had used his connections with the police and national authorities to intimidate children, youth and staff who sought to expose the abuses within the organisation. Not only was power centred in one person and his close allies, but he used his administrative powers to provide rewards and punishments, including regarding sponsorship money, financial settlements, employment, housing, and training or educational opportunities, amongst others. Moreover, he sought to entrench his power by ensuring that staff who spoke out or resisted his abuses were removed from employment, or children or youth that did the same were removed from housing.

SOS CVI has no anti-bullying policy. There is no evidence that recruitment and appraisal processes at all levels, including senior leadership, prioritise safeguarding competencies, including demonstrating values and attitudes which underpin a culture of safeguarding and respect.

### Recommendations:

- 7.14 Leadership at all levels of the federation should foster an organisational culture of safeguarding by developing high-profile, adequately-resourced and proactive initiatives to transform the norms, values and attitudes which undermine a culture of safeguarding. This includes lack of respect for women and children's rights or the rights of other groups in vulnerable circumstances, racism, bullying or using abusive and discriminatory language. Specific and measurable indicators for change should be set and independently reviewed at regular intervals. Information on the impact of such initiatives should be transparent and accessible throughout the Federation. The President and CEO should be personally accountable for leading this initiative.**

- 7.15 As a first step a robust and anti-bullying policy and procedures should be developed and rolled out across the federation as a matter of urgency and the code of conduct updated.**
- 7.16 All leaders should be formally held to account through the appraisal process for creating an open and transparent culture of safeguarding and personally modelling appropriate behaviours and organisational values at all times, as well as ensuring all staff in the organisation do the same.**
- 7.17 Recruitment of leaders in member associations, the GSC and governing bodies of SOS CVI should prioritise safeguarding competencies including demonstrating values and attitudes which underpin a culture of safeguarding and respect.**
- 7.18 Leaders should take personal responsibility for ensuring that each and every safeguarding incident including historical incidents is robustly and transparently investigated, by appropriately trained investigators.**

Ensuring children are aware of their right to be protected from abuse and staff understand their responsibility to protect children is fundamental. However, no organisation-wide initiatives have been developed to ensure children and young people understand their rights and no comprehensive global baseline survey has been conducted to understand this issue.

**Recommendations:**

- 7.19 Conduct a comprehensive global baseline survey to understand how well children in SOS CV care understand their rights and the responsibility of SOS CV to keep them safe from abuse.**
- 7.20 Children and young people's rights to be safe from abuse must be foregrounded across the organisation's culture and programmes. Children and young people must be made aware of their right to be safe from abuse and understand the standards of behaviour they should expect from the individuals and organisations with a duty of care towards them and what to do if abuse occurs. Each MA should develop and implement an action plan to address this critical aspect of abuse prevention, including specifying resources, timelines, and accountabilities.**

Most respondents to the review described SOS CV as a 'patriarchal organisation'. No systematic and independent research has ever been conducted on gender equality or women's leadership within SOS, including attitudes and beliefs around gender and women's rights, experiences of discrimination, differentials in pay and conditions, gender balance in leadership and Preventing Sexual Exploitation Abuse and Harassment. During 2016 and 2019 the Gender Audits were carried out in 31 countries (out of 135), however the global gender lead position is currently vacant so this work has been paused. It is unclear to what extent the audit recommendations were implemented. To address this gap, recruitment is now

underway to fill the gender position and a federation wide gender and PSEAH initiative is planned later this year.

Despite the incomplete audit process, some quantitative evidence of gender inequality does exist. In 2016 research on gender pay differentials between GSC staff showed that women were paid on average 7.8% less than men. The income of primary caregivers is very different by countries and Regions, as a tendency, in the CEE/CIS part of EUCM the pay is better than in the other Regions, globally the pay for SOS primary caregivers has not increased as favourably as for all other employees since 2008. There is a high turnover of SOS primary caregivers, the majority of whom are woman (88% of SOS parents are women). Pay and working conditions were identified as one reason for this.

The Sexual Misconduct Regulation on Preventing Sexual Exploitation Abuse and Harassment (PSEAH) was only launched in 2020 with limited resources for global implementation. No comprehensive data on SEAH is collected across the Federation. This leaves all staff at risk of harm. Given the disproportionate impact of SEAH on women and girls, the lack of comprehensive PSEAH measures is profoundly discriminatory, reinforcing patriarchal norms and contributing to a culture and environment where abuse of power is unchallenged. However, the roll out of the regulation has now begun with implementation by MAs planned over the next two years.

**Recommendations:**

**7.21 Commission robust, systematic and independent research on gender equality or women's leadership within SOS CV. This should include attitudes and beliefs around gender and women's rights, experiences of discrimination, differentials in pay and conditions, gender balance in leadership and SEA. Set out a clear action plan to address issues identified by the research.**

**7.22 As a matter of urgency implement a mandatory, comprehensive and rigorous PSEAH framework (including reporting and responding procedures, staffing, capacity building and awareness raising) across the federation. This must be additional to child safeguarding with dedicated resources. Where appropriate processes should be aligned and streamlined.**

## Oversight, Governance and Accountability on Safeguarding

Risk assessment is the foundation of a robust child safeguarding framework. Developing a clear understanding of when, where and how an organisation comes into contact with children, what risks this may present and what mitigations should be in place, is a primary governance responsibility. Whilst risk assessments are conducted at MA level, the ICSR found that there is no child safeguarding risk assessment for the GSC or the whole organisation, including regions, programmes, functions, projects and operations at all levels nor is there a safeguarding implementation plan with dedicated resources, timelines and accountabilities.

### **Recommendation:**

- 7.23 The GSC should develop and maintain a child safeguarding global risk assessment and an implementation plan for the Federation with specific resources, timelines and accountabilities.**

In addition, the review found a number of gaps related to child safeguarding and governance.

- National Boards do not all have Designated Child Safeguarding Leads.
- National Board members do not undertake regular comprehensive child safeguarding training.
- Child safeguarding has been a standing item on GSC meeting agendas for the last two months, however this change should be permanent and mandatory.
- All GSC staff are not required to undertake regular comprehensive child safeguarding training.
- There is evidence that procedures for preventing conflicts of interest have not been effective across the Federation.

### **Recommendations:**

- 7.24 Mandate a Designated Child Safeguarding Lead on every National Board. Define responsibilities in a specific job description.**
- 7.25 All National Board members should undertake a regular comprehensive child safeguarding training. The Designated Child Safeguarding Lead should receive enhanced training.**
- 7.26 Child safeguarding should be a mandatory item on an MA board meeting agendas.**
- 7.27 Child safeguarding should be a mandatory item on GSC leadership meeting agendas.**
- 7.28 All GSC staff should undertake regular comprehensive child safeguarding training.**

There is no specific and binding process for the GSC to hold MAs to account on child safeguarding failures. The consequences of this were evident in one country case review when following serious child safeguarding incidents, the National Board flatly refused to respond appropriately following a serious investigation or share information about the cases with the International Office. There is further evidence that some of the same members of the National Board, intimidated and subsequently fired whistle-blowers after their details were leaked allegedly by the IOR.

**Recommendations:**

**7.29** The GSC should develop and adopt a procedure for ensuring all MAs have appropriate safeguarding measures in place and respond appropriately to concerns when they occur. This should be demonstrated through a transparent and regular audit process. This should include an audit of measures to prevent conflict of interest in recruitment and governance.

**7.30** Where MAs fail to meet their safeguarding responsibilities, there should be a process for holding them to account including removing them from the federation and/or withdrawing funding.

Child safeguarding is everyone's responsibility. This means that the safeguarding leads should not be viewed as being solely responsible for all aspects of implementing child safeguarding per se. This would be impossible to achieve, and is likely result in extreme stress, burn-out and the risk that safeguarding staff are made scapegoats for broader organisational failures. Their purpose is to advise, support, set standards and provide a framework in which line management can be held to account on fulfilling their safeguarding responsibilities - they must however have adequate seniority and resources to do this and there must be clearly documented safeguarding accountability for all staff. Articulating and mandating clear safeguarding accountabilities is a governance and oversight responsibility.

**Recommendations:**

**7.31** An International Director of Child Safeguarding, reporting directly to the CEO and child safeguarding team should be appointed and assigned sufficient authority and resources to implement the global child safeguarding plan. The safeguarding team should be independent and enabled to investigate all safeguarding concerns, without fear or favour and without the risk of unwarranted interference and obstruction.

**7.32** The GSC should produce a document that outlines in detail the specific safeguarding roles and responsibilities of staff at all levels. This should include specific governance and oversight responsibilities with timescales and specific accountabilities for responding to concerns, alongside sanctions for failing to meet

**such responsibilities. National Directors should be accountable for ensuring this is communicated and implemented across all programmes.**

Issues of accountability and transparency compounded by the fact that the international safeguarding team does not have complete access to all relevant case documents and records when required and there is some strong evidence that this has resulted in conflicts of interest, avoidable and prolonged delays and the potential for tampering with an investigation.

**Recommendation:**

**7.33 To prevent conflicts of interest, reduce delays and the potential for tampering with an investigation, the GSC should mandate that the international safeguarding team be allowed complete unfettered access to all relevant case documents and records at any point. Appropriate mandatory standard deadlines should be identified for sharing such documents and compliance should be a condition of remaining in the federation.**

## Care quality and the role of primary caregivers

Care quality is a critical part of safeguarding. A child is at a higher risk of being harmed if there are failures in care quality and child safeguarding incidents may indicate poor programme quality. Children are more likely to report abuse if they are confident the organisation cares enough to protect them and will support them to recover and heal.

Primary caregivers play an essential role in protecting children from abuse. Across SOS CV the overwhelming majority (88 percent) of primary caregivers (SOS CV Mothers) are women, often from very vulnerable circumstances. The SOS mothers involved in the ICSR case reviews were offered very little supervision, support or training to undertake this challenging and skilled role with children who often presented with complex needs and histories of trauma and loss.

### Recommendation:

- 7.34 The GSC and member associations should invest in high-quality care programmes across the Federation, including improving pay, training, and conditions for primary caregivers.**

The original concept behind the model of SOS Children's Villages is described in the 2014 publication *Bound to Silence* which focused on cases of abuse between 1950 and the 1990s. 'A children's village consisted of several individual houses in which up to nine children lived with a female carer as though in a household. The carer functioned as a substitute mother. She had to live a celibate life in order to devote all her energy and attention to the children. The male position in the simulated family was occupied by the village director. As the substitute father he represented the element of order, obedience, and sanctioning powers. This model of the family – distorted by a conservative patriarchal attitude.'

It goes on to describe how 'the lack of expertise of the care personnel on the one hand and the conceptually founded sexual hierarchy between the female carers in the family-type communities and the male-occupied managerial positions on the other. These can be viewed as structures providing the opportunity for the practices of violence and abuse towards children and young people in the children's villages.'

This dynamic was observed in evidence provided to the review about SOS Mothers who were allegedly dismissed because they refused to give 'sexual favours' to powerful men within SOS CV and some children who were expelled or 'reunified' with family of origin for doing the same. There appeared to be systematic favouritism which could perhaps be described as a system of segregation whereby those children and SOS Mothers who received preferential treatment but were also abused were segregated from those who were chastised, deprived of an education, or who lost jobs, became victims of mobbing, or sent to refugee camps, amongst other reprisals.

While there were some SOS Mothers who were willing and able to take great risks to protect their children (in one case for example, by hiding them when a senior national staff member

sent people to forcibly remove and displace those children), most were placed in an untenable position where they could not protect their children through formal or informal channels internally or externally. Other SOS Mothers were subjected to rights violations such as being forced to abandon their biological children. All risked losing their homes, families, livelihoods and pension by reporting abuse.

In the time since many of the incidents in the country case reviews, SOS CV has undertaken a number of initiatives to improve the situation of primary caregivers including the SOS Care Promise Policy. Additionally, a statement by the International Senate was released on the human and child rights issues affecting SOS mothers/parents and their biological children, “Strong mothers/parents provide a caring family environment for children”, as well as a Policy Support Document on SOS Parents and their Biological Children Reunification, other support measures and new employment conditions. In 2020, the SOS Parent Profession User Guide was approved by the Management Team.

Such developments represent a considerable improvement on previous conditions, however there is still evidence of systemic power differentials across the federation. In order to create a safe environment for children and SOS primary caregivers, an urgent and comprehensive intervention to dismantle entrenched patriarchal norms, a zero-tolerance policy to rights violations, continuing to improve pay, training, and conditions for primary caregivers, and addressing the risk of SEAH is absolutely critical.

**Recommendations:**

- 7.35 The GSC and member associations should conduct comprehensive, independent global research to understand the situation, needs and priorities of primary caregivers. Each MA should develop and implement an action plan to address issues identified by the research, specifying resources, timelines, and accountabilities.**
- 7.36 SOS CV must uphold the full rights of all primary caregivers. They must be allowed their biological children to live with or visit them. There must also be safeguards put in place to ensure that if primary caregivers leave their employment they have access to a home and a stipend – the fear of losing their house and salary means they are far less likely to report.**
- 7.37 The GSC and member associations should ensure that the research on gender equality within SOS CV is focused on primary caregivers. Ensure the resulting clear action plan addresses the situation and priorities of primary caregivers.**
- 7.38 The GSC and member associations should ensure the new PSEAH framework is appropriate for and accessible to primary caregivers.**

**7.39 The GSC and member associations should systematically consult with primary caregivers on the creation, implementation and monitoring of programmes including child safeguarding and PSEAH measures.**

## Justice and support for victims, survivors, and whistle blowers

The ICSR found that although there were some examples of good practice, SOS Children's Villages does not have a specific protocol for supporting for all victims and survivors of abuse. There are no standards or designated resources assigned to implementing a victim and survivor centred approach to ensure quality, transparency, and accountability.

Limited comprehensive records are kept on outcomes for children abused in SOS care, however the review was provided with information on the situation of some. For example, two girls who became pregnant at 13 were 'exited' by SOS and forced onto the streets, and another 16-year-old, pregnant allegedly as the result of abuse became homeless and forced into commercial sexual exploitation. It is important to note that, since then measures have been put in place to require programmes to support pregnant girls. In October 2014, the Senate issued a statement on teenage pregnancy, stating that SOS Children's Villages must provide appropriate support to the mother and child in teenage pregnancy cases in programmes. However, these initiatives do not address the needs of girls who were previously abandoned by SOS CV.

Other young people described their situation on leaving SOS care as 'no skills, it is a life of broken promises'; 'I am old without skills'. Some reported that they are now living in dustbins. One interviewee reported that 'there are young people who have been completely unable to move forward. They have had no closure, are still scrambling for food, have no income whatsoever and their children are in the same situation'.

Independent external safeguarding practice reviews of serious cases are not regularly conducted and there are limited options for victims and survivors to pursue accountability, particularly if legal accountability is not possible.

### Recommendations:

**7.40** As a matter of priority, the GSC should develop a clear and detailed protocol to be implemented by all MAs outlining how SOS Children's Villages will provide timely support for all victims /survivors of abuse. This should build on the Child Protection Policy support document on child safeguarding investigations but set out clearly how SOS CV will implement a victim /survivor centred approach. It should require that a specific staff liaison person is nominated to advocate for the survivor. All staff should be trained in this protocol.

**7.41** The GSC should, in consultation with survivors, develop a set of standards and designate resources for a holistic, developmentally appropriate, culturally sensitive support plan to be offered to all victims /survivors. This should be adapted to the specific needs of each individual and include medical and psychosocial support, when required, as well as livelihoods and educational support. The plan should be developed by MAs in collaboration with each individual, however, care

**should be taken to ensure the immediate needs of victims /survivors (basic security, food, shelter, medical and legal needs, support to address trauma and so on) are addressed, in order that they are able to consent to, and participate in, such support and accountability initiatives in a meaningful way.**

**7.42 SOS CV should ensure that all survivors, including any subsequently identified, as well as former and current staff affected by abuse are offered an appropriate support plan in line with the standards adopted by the GSC with transparent reporting on long-term outcomes for each individual. National Directors should hold overall accountability for ensuring this is implemented.**

**7.43 The GSC should create a central database to track responses, investigations, as well as document support and long-term outcomes for all victims and survivors in the long term.**

**7.44 A new senior position to advocate for victims /survivors' rights should be created to oversee this process and ensure quality, transparency, and accountability.**

**7.45 The GSC should ensure regular independent external safeguarding practice reviews are conducted of serious cases.**

**7.46 The GSC should implement a mechanism which survivors can access directly to request a review of how their case was managed. Extensive efforts should be made to communicate this initiative widely.**

## 8. Conclusion

Since the incidents considered by the Independent Child Safeguarding Review, significant progress has been to strengthen child safeguarding across the federation, stepping up prevention efforts, increasing the capacity of child safeguarding investigators and improving reporting and responding procedures. However, to mitigate the risk of such incidents reoccurring, further robust, comprehensive and radical improvements are needed as a matter of urgency to ensure SOS Children's Villages can meet its commitment to create and maintain a caring and protective environment for every child reached through its programmes.

This requires an increased focus on care quality and support for primary caregivers, addressing gaps in safeguarding risk assessment, continuing to improve policy, process and practice across the federation, implementing a strong PSEAH framework, stepping up oversight and governance and ensuring a culture of respect for all by tackling bullying, victim-blaming, discrimination and patriarchal norms.

All efforts will be compromised if SOS CVI fails to empower and support its safeguarding staff. This means protecting them from bullying, harassment, burn out and vicarious trauma, as well as those who might seek to obstruct, interfere with, or undermine their work. Substantial investments should be made to expand capacity, at regional and national levels, including hiring a Director of Safeguarding reporting directly to the CEO, and mandating clear safeguarding accountabilities for staff at all levels of the organisation.

Each and every one of the children abused in SOS care should be treated as if they are part of a loving family, regardless of when they were abused or how old they are now. Therefore justice, accountability, care, healing and protection for all victims and survivors should be at the heart of every decision. This means a zero-tolerance approach to all child safeguarding violations, high-quality case management processes, investigations conducted without fear or favour and prioritising investing in support and advocacy for all survivors.

## 9. Summary of recommendations

<p><b>Overall</b></p> <p>7.1 SOS Children’s Villages International should prioritise the best interests of victims and survivors of abuse including historical abuse, and guarantee appropriate high-quality support and remedies to all without exception.</p> <p>7.2 Where evidence of wrongdoing exists SOS Children’s Villages should conduct an exhaustive, transparent, and independent investigation without fear or favour, as a matter of urgency.</p> <p>7.3 There should be a zero-tolerance approach to abuse with swift and proportionate sanctions for perpetrators, whenever that abuse occurred.</p> <p>7.4 To ensure the integrity of the investigation, no person with a conflict of interest in the incident should be involved in the investigation process, or in decisions about accountability. Evidence of wrongdoing by individuals still working at SOS CV should be prioritised for investigation, particularly if they have direct contact with children or are in positions of power and authority.</p>
<p><b>Child Safeguarding measures within SOS Children’s Villages International</b></p> <p>7.5 Adequate resources should be dedicated to context-specific, culturally-sensitive child safeguarding across the Federation. In the GSC (both IO and IORs). These should be assigned based on the needs identified in a comprehensive risk assessment. As an absolute minimum, SOS CV should prioritise protecting children at least as much as it prioritises protecting financial resources.</p> <p>7.6 Ensure all staff in the member associations and the GSC involved in managing incidents undertake specific case management training.</p> <p>7.7 Ensure relevant professional supervision and/or psychosocial support is offered to all SOS CV safeguarding staff.</p> <p>7.8 The SOS CV Child Protection Policy and code of conduct requires an urgent review to include specific roles and responsibilities at all levels as well as to include a provision that any individual found to have failed to report a safeguarding concern, failed to cooperate fully, or obstructed an investigation in any way will face sanctions.</p> <p>7.9 A detailed case management system must be developed by the GSC and implemented by member associations as a matter of urgency. Detailed records of each case and the SOS CV response must be maintained without exception. The GSC should ensure regular audits are conducted to ensure standards are met.</p>

7.10 Member associations, supported and monitored by the GSC, must ensure that communities, children, and victims /survivors are systematically involved with the creation and implementation and monitoring of safeguarding measures, accountability structures and wider programmes in order to ensure that these are context-specific, appropriate to the needs of children and accessible to all.

7.11 The global HR policy and procedures should be urgently and independently reviewed to ensure appropriate safeguarding is incorporated and becomes mandatory across the Federation. This should include stringent procedures to prevent conflicts of interest. Any individual with a conflict of interest in a safeguarding investigation should be disqualified from decision-making about accountability measures. This should include board members of member associations as well as SOS CVI.

7.12 The GCS and member associations must ensure individual safeguarding responsibilities are assessed as part of recruitment, performance management and appraisal processes, with staff required to understand and model organisational values and appropriate behaviour at all times.

7.13 All SOS CVI and member association senior management and board members should be required to complete a conflict-of-interest form on recruitment and again annually. Failure to do so, or failure to declare any conflicts of interest should result in disciplinary action including removal from the position. Specific procedures should be developed to manage conflicts of interest in line with local laws.

#### **Leadership and organisational culture**

7.14 Leadership at all levels of the federation should foster an organisational culture of safeguarding by developing high-profile, adequately-resourced and proactive initiatives to transform the norms, values and attitudes which undermine a culture of safeguarding. This includes lack of respect for women and children's rights or the rights of other groups in vulnerable circumstances, racism, bullying or using abusive and discriminatory language. Specific and measurable indicators for change should be set and independently reviewed at regular intervals. Information on the impact of such initiatives should be transparent and accessible throughout the Federation. The President and CEO should be personally accountable for leading this initiative.

7.15 As a first step a robust and anti-bullying policy and procedures should be developed and rolled out across the federation as a matter of urgency and the code of conduct updated.

7.16 All leaders should be formally held to account through the appraisal process for creating an open and transparent culture of safeguarding and personally modelling appropriate behaviours and organisational values at all times, as well as ensuring all staff in the organisation do the same.

- 7.17 Recruitment of leaders in member associations, the GSC and governing bodies of SOS CVI should prioritise safeguarding competencies including demonstrating values and attitudes which underpin a culture of safeguarding and respect.
- 7.18 Leaders should take personal responsibility for ensuring that each and every safeguarding incident including historical incidents is robustly and transparently investigated, by appropriately trained investigators.
- 7.19 Conduct a comprehensive global baseline survey to understand how well children in SOS CV care understand their rights and the responsibility of SOS CV to keep them safe from abuse.
- 7.20 Children and young people’s rights to be safe from abuse must be foregrounded across the organisation’s culture and programmes. Children and young people must be made aware of their right to be safe from abuse and understand the standards of behaviour they should expect from the individuals and organisations with a duty of care towards them and what to do if abuse occurs. Each MA should develop and implement an action plan to address this critical aspect of abuse prevention, including specifying resources, timelines, and accountabilities.
- 7.21 Commission robust, systematic and independent research on gender equality or women’s leadership within SOS CV. This should include attitudes and beliefs around gender and women’s rights, experiences of discrimination, differentials in pay and conditions, gender balance in leadership and SEA. Set out a clear action plan to address issues identified by the research.
- 7.22 As a matter of urgency implement a mandatory, comprehensive and rigorous PSEAH framework (including reporting and responding procedures, staffing, capacity building and awareness raising) across the federation. This must be additional to child safeguarding with dedicated resources. Where appropriate processes should be aligned and streamlined.

**Oversight, governance and accountability**

- 7.23 The GSC should develop and maintain a child safeguarding global risk assessment and an implementation plan for the Federation with specific resources, timelines and accountabilities.
- 7.24 Mandate a Designated Child Safeguarding Lead on every National Board. Define responsibilities in a specific job description.
- 7.25 All National Board members should undertake a regular comprehensive child safeguarding training. The Designated Child Safeguarding Lead should receive enhanced training.
- 7.26 Child safeguarding should be a mandatory item on an MA board meeting agendas.

- 7.27 Child safeguarding should be a mandatory item on GSC leadership meeting agendas.
- 7.28 All GSC staff should undertake regular comprehensive child safeguarding training.
- 7.29 The GSC should develop and adopt a procedure for ensuring all MAs have appropriate safeguarding measures in place and respond appropriately to concerns when they occur. This should be demonstrated through a transparent and regular audit process. This should include an audit of measures to prevent conflict of interest in recruitment and governance.
- 7.30 Where MAs fail to meet their safeguarding responsibilities, there should be a process for holding them to account including removing them from the federation and/or withdrawing funding.
- 7.31 An International Director of Child Safeguarding, reporting directly to the CEO and child safeguarding team, should be appointed and assigned sufficient authority and resources to implement the global child safeguarding plan. The safeguarding team should be independent and enabled to investigate all safeguarding concerns, without fear or favour and without the risk of unwarranted interference and obstruction.
- 7.32 The GSC should produce a document that outlines in detail the specific safeguarding roles and responsibilities of staff at all levels. This should include specific governance and oversight responsibilities with timescales and specific accountabilities for responding to concerns, alongside sanctions for failing to meet such responsibilities. National Directors should be accountable for ensuring this is communicated and implemented across all programmes.
- 7.33 To prevent conflicts of interest, reduce delays and the potential for tampering with an investigation, the GSC should mandate that the international safeguarding team be allowed complete unfettered access to all relevant case documents and records at any point. Appropriate mandatory standard deadlines should be identified for sharing such documents and compliance should be a condition of remaining in the federation.

#### **Care quality and the role of primary caregivers**

- 7.34 The GSC and member associations should invest in high-quality care programmes across the Federation, including improving pay, training, and conditions for primary caregivers.
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a home and a stipend – the fear of losing their house and salary means they are far less likely to report.

7.37 The GSC and member associations should ensure that the research on gender equality within SOS CV is focused on primary caregivers. Ensure the resulting clear action plan addresses the situation and priorities of primary caregivers.

7.38 The GSC and member associations should ensure the new PSEAH framework is appropriate for and accessible to primary caregivers.

7.39 The GSC and member associations should systematically consult with primary caregivers on the creation, implementation and monitoring of programmes including child safeguarding and PSEAH measures.

**Justice and support for victims, survivors, and whistle blowers**

7.40 As a matter of priority, the GSC should develop a clear and detailed protocol to be implemented by all MAs outlining how SOS Children’s Villages will provide timely support for all victims /survivors of abuse. This should build on the Child Protection Policy support document on child safeguarding investigations but set out clearly how SOS will implement a victim /survivor centred approach. It should require that a specific staff liaison person is nominated to advocate for the survivor. All staff should be trained in this protocol.

7.41 The GSC should, in consultation with survivors, develop a set of standards and designate resources for a holistic, developmentally appropriate, culturally sensitive support plan to be offered to all victims /survivors. This should be adapted to the specific needs of each individual and include medical and psychosocial support, when required, as well as livelihoods and educational support. The plan should be developed by MAs in collaboration with each individual, however, care should be taken to ensure the immediate needs of victims /survivors (basic security, food, shelter, medical and legal needs, support to address trauma and so on) are addressed, in order that they are able to consent to, and participate in, such support and accountability initiatives in a meaningful way.

7.42 SOS CV should ensure that all survivors, including any subsequently identified, as well as former and current staff affected by abuse are offered an appropriate support plan in line with the standards adopted by the GSC with transparent reporting on long-term outcomes for each individual. National Directors should hold overall accountability for ensuring this is implemented.

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7.46 The GSC should implement a mechanism which survivors can access directly to request a review of how their case was managed. Extensive efforts should be made to communicate this initiative widely.