

# Final Report of the Independent Special Commission: Management Response

As part of our response to past organizational failures, SOS Children's Villages has received the final report of an impartial, expert commission and welcomes its recommendations. The commission recognizes our progress in the past two years and the work that remains. The report is made public in line with our commitment to transparency.

SOS Children's Villages does not tolerate abuse or violence against children and adults participating in our programmes or against the people who work for our organization. It deeply saddens us that there have been instances where we have failed to keep people safe.

Two years ago, we publicly apologized for the harm caused to those affected by past abuse, and we apologize again today. We continue to urge anyone with knowledge of wrongdoing anywhere in the SOS Children's Villages federation to come forward. We will listen to and act on all allegations and remain focused on supporting the victims/survivors.

# **The Independent Special Commission**

The Independent Special Commission (ISC) was established by the International Senate as the highest supervisory body, following reviews initiated by SOS Children's Villages. It was part of our extensive Safeguarding Action Plan, adopted in 2021 to ensure that victims/survivors get the support they need and that we address the root causes of past failures.

We thank all those who came forward to raise concerns and to give evidence to the commission. We will do everything possible to do right by them so that SOS Children's Villages delivers on its mission to ensure children and young people grow up with the support and relationships they need to become their strongest selves.

# **Progress made**

We are pleased that the commission recognized the progress we have been making in the past two years: We have put in place a global ombudsperson system to represent the needs of children and young people, and we have provided integral, individualized support to more than 500 victims/survivors. We have adopted stronger policies such as a new Code of Conduct and Child and Youth Safeguarding Policy. We have increased awareness of safeguarding risks across the federation. Further information on our progress is described in our Safeguarding Action Plan Progress Report on our international website.

## **Next steps**

The commission also concluded that significant work remains to complete the necessary transformation, including improving human resources standards; conducting leadership audits at all levels; strengthening governance structures; and ensuring we meet our duty of care to child and youth care practitioners. Plus following up on the commission's investigation reports and holding individuals, including leaders, accountable.





In its resolution responding to the ISC final report, our International Senate has recognized the need to re-design our current governance structure and has committed to setting up a new mechanism for dealing with failures to comply with binding policies. It has committed to strengthening good governance by, for example, mandating background checks, annual declarations of interests, and safeguarding training for all supervisory board members.

This work is paramount to ensuring a safe environment for children, young people, and the people who deliver our programmes. We must do what is necessary to embed a culture of accountability and to address weaknesses in our governance systems.



SUMMARY OF K  ISC recommendation	EY ACTIONS TO THE RECOMMENDATIONS IN THE FINAL REPORT OF THE INDEPENDENT SP  Key actions	Select Key Performance
ISC Recommendation 1	Ongoing or Immediate Actions responding to recommendation 1	Indicators / Time Frame
Fundamental reforms to governance and leadership structures through strengthened commitment to objectives-based approach to transparency, checks and oalances, and accountability.	<ol> <li>Strengthen Good Governance         <ul> <li>In July 2023, the International Senate will put forward to the General Assembly for approval substantially revised International Statutes and General Assembly Rules of Procedure that significantly strengthen compliance mechanisms, our binding policy framework and sanctions for non-compliance.</li> <li>The International Senate further acknowledges the need to continue to re-design our governance structure and emphasizes the need to guarantee good governance, leadership, and accountability at all levels of the Federation and commits to leading a process that strengthens these.</li> <li>The International Senate further confirms its commitment to strengthen good governance across the federation by putting in place background checks, annual 'declaration of interests' and mandatory safeguarding training for all International Senate and board members.</li> <li>The International Senate announced the establishment of an International Senate Risk Management &amp; Compliance Committee.</li> <li>Further measures will be pursued to ensure that ISC Recommendation 1 is implemented in full</li> </ul> </li> </ol>	07/23  General Assembly 06/25  Immediate  Immediate
	<ul> <li>Individual Accountability</li> <li>The International Senate commits to continue to lead and support Member Associations in pursuing legal action with local authorities for any persons found culpable of safeguarding violations, including to pursue active recovery of physical assets that may have ended up in private hands.</li> <li>The International Senate asks all legal bodies in the federation to redefine the relationship with, and role of, historical leaders.</li> <li>Continue current efforts to foster individual accountability through increased awareness, training and the implementation of tools that facilitate self-reflection and promote responsible decision-making.</li> <li>Misconduct Incident Management Regulation streamlines and will be complemented in the next 12 months by significant additional efforts in HR.</li> </ul>	Ongoing  07/24  Ongoing  07/24



### ISC Recommendation 2 Ongoing or Immediate Actions responding to recommendation 2 Child Safeguarding: enhancing 1. The 2021-2024 Safeguarding Action Plan implementation of policies and The ISC report further underscores the importance of initiatives already under way. Safeguarding Action Plan delivered procedures through As of March 2022, we have advanced on all 24 actions of the Safeguarding Action in full by 12/24 commitment to resourcing, Plan, and more than 70% of the 35 indicators are on track or already completed. training, and accountability for (Safeguarding Action Plan Progress Report, 03/23). For example, 100% of Member adherence failures. Associations already completed their first annual assessment of their risk profile and defined mitigating actions to address their internal and external risks. A revision of the Safeguarding Action Plan is planned for Q3/2023 to incorporate the 100% of Member Associations findings from ISC. Topics to be revised include the incorporation of an asset implement continuous safeguarding action plan, strengthening prevention and programme quality, surge safeguarding capacity-building capacity, complaints and feedback mechanisms for community-based programmes programmes by 12/24 and humanitarian responses and key performance indicators. Focus will be put on increasing capacity and monitoring to ensure implementation of the Safeguarding Action Plan in all Member Associations. 98 Member Associations have a We are now half-way through the four-year plan. We recognize that rolling out strategy to ensure relevance, policies, providing training, and generally raising awareness needs to go faster. We efficiency and sustainability of must continue to address the root causes such as programme quality, as described programmes by 12/24 in the ISC's report. 2. Ombuds Office to represent needs of children and young people. Global Ombuds for the federation We are fulfilling our commitment to independent ombuds (or equivalent) to represent the rights of all children and young people, past and present, in all programmes in place by 12/23 through establishing the Ombuds Office. Requirements are formalised in the new Child and Youth Safeguarding Policy and Regulation. Children and young people are at the centre of the Ombuds Office model, as rights 100% of MAs covered by the holders, clients and social actors who inform the design, implementation and system by 12/24 monitoring of the Ombuds Office. This approach ensures the model is relevant and Ombuds are accountable. The Ombuds Office also follows a 'ground-up' approach that operates on the principle "The solution is where the problem is." National Ombuds work with inquirers to promote fairness of process; mediate; resolve conflicts; and identify gaps and themes for management and governance to act on. The Ombuds Office is now operational with National Ombuds in the 2022 pilots in



Benin, Sierra Leone, and Uruguay; Regional Ombuds in LAAM and WCNA; Ombuds Coordinators (2); co-interim Global Ombuds; and an Ombuds Board of 5 members.

	<ul> <li>The Global Ombuds will be selected by July 2023, including the participation of young people in an interview panel; three more Regional Ombuds will be recruited for ASIA, ESAF and EUCM by the end of 2023.</li> <li>The target for 2023 is 27 additional MAs recruiting National Ombuds, building on the 'ground up' experience of the first pilots in Benin, Sierra Leone and Uruguay.</li> </ul>	
	<ul> <li>3. Competitive remuneration for Child and Youth Care Practitioners across the federation</li> <li>Most Member Associations already pay competitive wages to their employees, however there are a few countries that struggle to do so due to an overall lack of resources. Global rise in inflation and cost of living has further exacerbated this.</li> <li>A clearly defined and resourced roadmap to ensure competitive remuneration for all employees with a focus on child and youth care practitioners has already been agreed in Q1/2023. In a first step until end of 2023, for any remaining Member Associations where this is not already in place, all child and youth care practitioners sharing life space with beneficiaries will receive a living wage.</li> </ul>	By 12/24, 101 Member Associations contextualize and implement the SOS Parent Profession User Guide, including filling pension and compensation gaps.  By 12/24, 106 Member Associations ensure access to learning and development opportunities for all child and youth care practitioners
ISC Recommendation 3	Ongoing or Immediate Actions responding to recommendation 3	
Reassess and recommit to the welfare and rights of survivors and to reconciling the safeguarding failures endured.	<ol> <li>Integral, individualized support to 500+ victims/survivors.</li> <li>In 2021, SOS Children's Villages set aside funding from existing reserves for direct individual support to all children, young people and other persons that have experienced abuse to ensure those affected are supported towards healing, reconciliation, and becoming self-reliant. By December 2022, 83 countries had already implemented minimum standards for individualized support</li> <li>This includes medical, mental health, psychosocial and legal support as well as support to improve their individual living situations. Support is to be immediate, individualized, supportive, realistic, and empowering to the individual.</li> </ol>	By 12/24, 100% of Member Associations will have implemented strict minimum standards on delivering individualized support
	New Misconduct Incident Management Regulation     The regulation manages how all forms of suspected cases of misconduct are to be handled in the organization. Focus is on transparent reporting and responding processes and procedures available across child safeguarding, adult safeguarding	Aligned reporting, responding and investigation procedures concept



	<ul> <li>and asset protection. It clarifies and details the necessary steps to manage incidents from receiving a complaint to its closure.</li> <li>Zero tolerance for abuse and accountability for perpetrators</li> <li>We will continue to facilitate access to legal services and engage lawyers experienced with cases of abuse so that victims/survivors can bring their abusers to justice wherever possible.</li> </ul>	rolled out by 12/23, further implementation in 2024  Ongoing
	<ul> <li>When the investigations' findings are confirmed, we continue to commit to taking appropriate disciplinary sanctions and/or legal proceedings.</li> <li>Safeguarding Incident Management System (SIMS)         <ul> <li>A pilot Real-Time Reporting platform on child safeguarding incidents of abusive behavior was developed in 2021 and implemented in West and Central Africa.</li> <li>A Safeguarding Incident Management System (SIMS) is currently under development and will be rolled out across the federation by 2024, supporting transparency in all areas of safeguarding.</li> <li>SIMS will enable the collection, storage and analysis of information on misconduct incidents agrees shild referenceding, adult of guarding and agent protection.</li> </ul> </li> </ul>	100% of Member Associations complete SIMS roll-out by December 2024, which includes determining linkage of current reporting systems in place at Member Association level
ISC Recommendation 4 Fundamental recommitment to	<ul> <li>incidents across child safeguarding, adult safeguarding and asset protection.</li> <li>All Member Associations must use either SIMS or their own equivalent system that can interface with the global system.</li> <li>Ongoing or Immediate Actions responding to recommendation 4</li> <li>Asset Safeguarding Action Plan (2023-2024)</li> </ul>	
asset safeguarding frameworks developing and instilling internal controls to improve implementation, governance, assessment management, audit, and whistleblower protection.	Priority has been given in 2023 to the implementation of an <b>Asset Safeguarding System</b> , and the following has already been achieved in the last 6 months or are currently underway:  • Creating a blueprint of an internal control system for all Member Associations.  • Conducting risk assessment workshops on asset protection across all regions  • Building a new and dedicated Asset Safeguarding Unit in the General Secretariat  • Compiling and assessing all existing regulations with reference to asset safeguarding and defining the gap area. Drafting will commence shortly on an updated Anti-Fraud and Anti-Corruption Regulation and a revision of the Good Management and Accountability Quality Standards Policy.	12/24



	<ul> <li>Establishing an organization-wide asset register.</li> <li>Developing a system for business partner compliance check, incl. sanctions compliance, anti-money laundering and business partner assessment.</li> <li>Integrating asset protection as an integral part into the new Safeguarding Information Management Systems.</li> </ul>	
	<ul> <li>Finalize set-up of an independent investigation unit and audit function.</li> <li>The international audit function has been growing significantly and already has a direct reporting line to the supervisor board since 2022. The first International Audit Charter was approved in 03/23 and is mandatory for all Member Associations.</li> <li>The detailed set-up of an independent investigation unit has been drafted and the recruitment process for the first Head of Investigations is in its final phase.</li> </ul>	07/24
ISC Recommendation 5	Ongoing or Immediate Actions responding to recommendation 5	
Secure funding, policy, and procedures commitment to revamp Human Resources guided by fundamental considerations for safeguarding prevention and staff protection.	<ul> <li>Values-based Code of Conduct</li> <li>A revised value-based Code of Conduct was approved in 03/23 and is now binding for all Member Associations and outlines behaviors expected across the federation.</li> <li>A Values-based competency framework was developed in 2022 and will be integrated into all key HR processes by December 2024</li> </ul>	100% of the General Secretariat staff to be trained on new Code of Conduct by 06/24
	<ul> <li>2. Protection from Sexual Harassment, Exploitation and Abuse (PSHEA)</li> <li>Full implementation of the 2019 Sexual Misconduct (PSHEA) Regulation forms a cornerstone of the Safeguarding Action Plan. In 2022 pilots were rolled out in 10 Members Associations in Africa as well as the General Secretariat and in 2023 the roll out to all countries has started.</li> <li>A regulation implementation user guide and implementation toolkit are now available across the Federation to support implementation of the three pillars: prevention, reporting and response.</li> <li>A PSHEA e-learning training will be available in August 2023.</li> </ul>	PSHEA regulation rolled-out in 100% of federation by 12/24, implementation continuing in 2025



<ul> <li>Safe work environment with promotion of 'Speak Up' culture</li> <li>Cycles of awareness raising sessions on speak up culture and safeguarding leadership practices have started with hundreds of leaders across the federation, with particularly high resonance in the LAAM region.</li> <li>This offer will be further promoted to extend the initiative to all parts of the federation and ensure that a critical mass of leaders role model safeguarding leadership practices and promote a speak up culture.</li> </ul>	3 targeted initiatives for federation culture development on holistic safeguarding developed by 12/23  80% of all federation leadership, including board representatives, reached with safeguarding awareness raising and training by 12/2024
4. Federation-wide Human Resource (HR) Framework.	
<ul> <li>Building a federation wide HR Framework is under way with related binding standards, processes, guidelines and tools – implementation through strong, training &amp; capacity building leading to local ownership to achieve accountability. This includes but is not limited to:</li> <li>Misconduct response – capacity building of set regulation and expanding upon needed standards (being developed) in disciplinary, appeals, grievance.</li> <li>Performance management at all levels</li> <li>The development of a new "People and Culture Policy" setting minimum standards/concepts/principles.</li> <li>Safe recruitment guideline</li> <li>Development of the concept of Duty of Care to victim/survivors and staff with the Global Ombuds Office and rolling out of the sector wide Misconduct Disclosure System.</li> </ul>	New global HR policy rolled-out to 100% of Member Associations by 12/24, implementation continues in 2025  By 12/24, safe recruitment regulation implemented in GSC incl. IORs
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<ul> <li>Leadership development and audits</li> <li>Following the ISC recommendation, leadership 'audits' will be conducted at all levels of SOS Children's Villages International</li> <li>Clear expectations and goals for each leadership position as well as regular performance reviews referring to the achievement of results as well as behavioral aspects to be reinforced.</li> <li>Continuous development for leaders and a collaboration culture strengthened to emphasize values-based conduct (cf. Living our Values competency framework), strengthened performance management and leadership assessment to be applied</li> </ul>	12/24
where appropriate.	



ISC Recommendation 6	Ongoing and Immediate Actions responding to recommendation 6	
Reform confidence in the autonomy of MA governance and leadership through improved multilateral communications and improved member level administration of SOS CV policies and	<ul> <li>Trainings on power imbalances for leaders across the federation</li> <li>The trainings will cover different aspects of safeguarding culture, especially power dynamics and how they influence safeguarding. Other topics such as anti-discrimination, -bullying, -harassment and diversity and inclusion will be added. The trainings will be organized over a period of 12 months.</li> </ul>	To be developed. Planned roll-out by 12/24
procedures.	Strengthen Good Governance in MAs:     Analyse good governance practices and corrective measures, incl. issues like selection and composition of Supervisory Boards, to guarantee that Boards and National Directors do not have conflicts of interest, incompatibilities and disqualifications, and determine terms and continuity plans.	12/24
	3. Finalize model statutes for member associations based on the revised International Statutes	Model statutes finalized by 04/24
ISC Recommendation 7	Immediate and Ongoing Actions responding to recommendation 7	
Effectuate diversity and representation through proactive inclusion from across the federation to	<ul> <li>Addressing power imbalances between members of the Federation and its structures by prioritizing localization based on the principles of solidarity, humility, self-determination and equity.</li> </ul>	12/24
leadership position and structures.	<ul> <li>The International Senate is discussing the representation of a more equal representation of global south members with funding members in the Senate.</li> </ul>	06/25
	<ul> <li>Since 2022, all leadership positions in the General Secretariat and most international office positions have been opened globally, to ensure global and diverse representation in senior positions and the international office.</li> </ul>	Ongoing
	<ul> <li>The General Secretariat will develop a guideline on i) Diversity, Equity and Inclusion,</li> <li>ii) Gender Equity/Equality.</li> </ul>	12/24
	<ul> <li>SOS Children's Villages International will become a signatory of the Pledge for Change.</li> </ul>	12/23

