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# Girls' Education Challenge

## Overarching Safeguarding Policy

**Approval Date:** October 2023

**Policy Owner:** Zlatina Loudjeva, PwC Engagement Partner

**Cross Reference/ Related policies:**

- Child and Adults at Risk Safeguarding Policy
- Protection from Sexual Exploitation, Abuse and Harassment Policy
- Protection from Sexual Exploitation, Abuse and Harassment at Work Policy
- Do No Harm Policy
- Whistleblowing Policy
- PwC Mandatory Safeguarding guidance for all engagements with the Foreign, Commonwealth and Development Office (FCDO)

If you have a concern about inappropriate behaviour perpetrated by a GEC Fund Manager staff member or contractor, please contact your line manager or report anonymously to the GEC whistleblowing email address: [uk\\_gec\\_pmo@pwc.com](mailto:uk_gec_pmo@pwc.com).

If you have a safeguarding concern involving a GEC fund recipient please contact the GEC's Safeguarding Lead, [nancy.abwola@girlseducationchallenge.org](mailto:nancy.abwola@girlseducationchallenge.org) and/or [uk\\_gec\\_pmo@pwc.com](mailto:uk_gec_pmo@pwc.com).

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## Definitions

**Adult at risk:** Any person who is aged 18 years or over and who is at risk of abuse or neglect because of their needs for care and support. This can include for mental health issues, learning or physical disability, sensory impairment, age or illness and who is or may be unable to take care of themselves or are unable to protect themselves against significant harm or exploitation. (Care Act 2014 [England]).

**Alliance Partner:** any of the organisations that form the key partners of the Fund Manager (FM), PricewaterhouseCoopers (PwC), Cambridge Education, Nathan Associates, and Social Development Direct (SDDirect).

**Child:** refers to any person under the age of 18.

**Child Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children. Child Abuse can be physical, sexual, emotional or through purposeful or unintentional neglect.

**Child Exploitation:** refers to the use of children for someone else's advantage, gratification or profit often resulting in unjust, cruel and harmful treatment of the child. These activities are to the detriment of the child's physical or mental health, education, moral or social-emotional development.

**Child Labour:** refers to work that deprives children (any person under 18) of their childhood, their potential and their dignity, and that is harmful to their physical and/or mental development. It refers to work that is mentally, or morally dangerous and harmful to children; and/or interferes with their schooling by: (1) depriving them of the opportunity to attend school; (2) obliging them to leave school prematurely; (3) requiring them to attempt to combine school attendance with excessively long and heavy work. The Worst Forms of Child Labour include: all forms of slavery, the trafficking and sale of children, and the compulsory recruitment of children into armed conflict; the use, procuring or offering of child for prostitution, for the production of pornographic performances; the use, procuring or offering of a child for illicit activities; work which, by its nature of the circumstances in which it is carried out, it likely to harm the health, safety and morals of children.

**Child Protection:** The FM uses the term 'child protection' to refer to preventing and responding to violence, exploitation and abuse against children – including commercial sexual exploitation, trafficking, child labour and harmful traditional practices, such as female genital mutilation/cutting and child marriage. The FM acknowledges that many of our partners' projects target children who are uniquely vulnerable to abuses, such as when living without parental care, in conflict with the law, in armed conflict contexts, street children and are particularly vulnerable to child protection concerns due to identity, social and geographical

determinants – notably gender and disability status. Violations of the child’s right to protection take place in every country and are under-recognised and under-reported. Children subjected to violence, exploitation, abuse and neglect are at risk of death, poor physical health, poor mental health, developmental delays, HIV/AIDS infection, displacement, homelessness and other issues. The impacts may last for their entire lives, including affecting their parenting skills in later life.

**Complainant:** The person/s who file a complaint regarding wrongdoing. This can be the alleged survivor or may be a witness or another person who becomes aware of the wrongdoing.

**Disclosure:** The process of revealing information. Disclosure about abuse can be directly or indirectly communicated. The term disclosure is preferred over identification as it indicates that the individual sharing details of an incident or concern has decided to discuss the incident with the organisation. An individual who discloses may become a complainant.

**Discrimination:** refers to treating a person, or a group of people less favourably than another person or group based on protected characteristics, as listed in the UK Equality Act (2010), affiliation to unions or groups, perceived class status, educational background or political belief.

**Do No Harm:** In the GEC to ‘do no harm’ means to avoid causing damage and suffering, through action or inaction, as a result of GEC activities.

**Fund Manager (FM):** an alliance led by PwC to administer the funds for the Girls’ Education Challenge (GEC) programme.

**Fund recipient:** any organisation receiving a grant from the FM to implement activities to promote girls’ education.

**Gender Based Violence:** Refers to violence that targets individuals or groups on the basis of their gender. The Committee on the Elimination of Discrimination against Women (CEDAW) defines it as “violence that is directed against a woman because she is a woman or that affects women disproportionately”, in its General Recommendation 19. This includes acts that inflict physical, mental or sexual harm or suffering, the threat of such acts, coercion and other deprivations of liberty. Together with violence against women, “gender-based violence” is used interchangeably.

**Inclusion:** ensuring all are valued, respected and supported.

**Harassment in the Workplace:** any form of behaviour that is unwelcomed, unsolicited, unreciprocated and may be repeated. It is behaviour that is likely to offend, humiliate, or intimidate. It can make it difficult for effective work to be done by the staff member or groups targeted or affected by this behaviour. For harassment to occur, there does not have to be an intention to offend or harass. It is the impact of the behaviour on the person who is receiving it, together with the nature of the behaviour, which determines whether it is harassment.

**Informed Consent:** Consent is when a person makes an informed choice to agree freely and voluntarily to do something. There is no consent when agreement is obtained through:

- The use of threats, force or other forms of coercion, abduction, fraud, manipulation, deception, or misrepresentation;
- The use of a threat to withhold a benefit to which the person is already entitled; or
- A promise is made to the person to provide a benefit.<sup>1</sup>

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<sup>1</sup> OCHA, UNHCR, IRC [The GBV IMS, GBV Classification Tool](#), 2006.

**Potential Wrongdoing/Wrongdoing:** A claim that an individual or group of individuals has done something which is 'wrong' and breaches code of conduct or other safeguarding policy – but there is not yet evidence that this claim is true. When the claim has been proven, we use the word 'wrongdoing'.

**Potential Wrongdoer/Wrongdoer:** The individual or group of individuals who have been accused of wrongdoing.

**Safeguarding:** Preventing and responding to harm caused by sexual exploitation, abuse, harassment or bullying. The aim is to minimise the likelihood and impact of these actions towards both the people we are trying to help, and also people who are working in the sector. (From: Enhanced Due Diligence for External Partners- FCDO). **Child safeguarding** refers explicitly to the protection of children. The FM uses the term Child Safeguarding to refer to action that is taken to promote the welfare of children and protect them from harm – directly or indirectly.

Child protection is a part of the safeguarding process, but the term safeguarding is wider as it also encompasses taking action to enable children to have the best outcomes in life. Child Safeguarding also highlights the responsibility of organisations working with children, directly or indirectly, to take all reasonable measures such that the risks of harm to children's welfare are minimised and, where there are concerns about children and young people's welfare, to take appropriate actions to address those concerns, working to agreed policies and procedures and in partnership with other organisations. It refers to institutional/internal policies and procedures intended such that children are not exposed to harm and abuse through their contact with the organisation, their staff and their participation in projects and programmes and that the organisation's operations do no harm to children. In addition, it incorporates the FM's responsibility to make sure that where there are concerns over a child's/children's welfare or where a child has/children have been subject to abuse by a staff member or contractor of the FM or similar of a GEC partner, actions are taken to address this, i.e. concerns are reported and responded to appropriately in line with the relevant global and local procedures, whether the abuse may have happened within or external to our organisation.

**Secondary beneficiary:** A secondary beneficiary is an individual who directly or indirectly is affected by GEC activities. For example, the family or partner of a direct beneficiary.

**Secondary survivor:** Person impacted by the experience of Gender-based Violence inflicted upon the survivor. May include family members or others close to the survivor.

**Sexual exploitation, abuse and harassment (SEAH):** Sexual exploitation "means any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including but not limited to profiting monetarily, socially, or politically from the sexual abuse of another. The term sexual abuse means the actual or threatened physical intrusion of a sexual nature, whether by force or unequal or coercive conditions". (UN Secretary General's Bulletin Special measures for protection from sexual exploitation and sexual abuse, 2003). Sexual harassment is a type of harassment involving the use of explicit or implicit sexual favours. Sexual harassment can occur in many different social settings such as the home, school, churches, or the workplace. Sexual harassment can involve teasing, offhand comments or sexualised 'jokes'. Sexual harassment may include the disclosure, or discussion of, an individual's sexual orientation or gender-identity without an individual's express permission. Sexual harassment can be viewed as isolated incident or repeated incident, which creates a hostile or offensive environment.

For work-place related sexual harassment, see the GEC Protection from Sexual Exploitation, Abuse and Harassment at Work Policy.

The FM's definition of sexual exploitation, abuse and harassment goes further to include all forms of Gender based Violence (GBV).

**Survivor:** We use the term survivor to describe the person who has experienced violence. Sometimes people use the word 'victim'. This is now out-dated. The word 'survivor' is used as it is more empowering and implies resiliency.

**Staff and contractors:** any person employed by or contracted through any of the alliance Fund Recipients to work for the FM, either full time or part time.

**Whistleblowing:** When a worker passes on information concerning wrongdoing which they feel is in the public interest.

## Acronyms

|          |  |
|----------|--|
| CFM      | Country Finance Monitor                      |
| DBS      | Disclosure and Barring Service               |
| FM       | Fund Manager                                 |
| FCDO     | Foreign, Commonwealth and Development Office |
| GEC      | Girls Education Challenge                    |
| ICPC     | International Child Protection Certificate   |
| PA       | Portfolio Adviser                            |
| PMO      | Programme Management Office                  |
| PwC      | PricewaterhouseCoopers                       |
| SDDirect | Social Development Direct                    |
| SPA      | Senior Portfolio Adviser                     |
| SMT      | Senior Management Team                       |

# 1. The Girls' Education Challenge

The Girls' Education Challenge (GEC) is a Foreign, Commonwealth and Development Office (FCDO) supported fund set up to support charitable and private sector organisations to find better ways to provide education opportunities to marginalised girls in some of the poorest countries in Africa and Asia. Through a competitive process, it funds projects that focus on innovative and cost-effective ways of getting marginalised girls into primary and secondary education, keeping them there, and making sure they learn. Applicant organisations have to demonstrate measurable improvements in the quality of learning as well as increased numbers of girls going through school.

The GEC is run by a Fund Manager (FM), and administered by PricewaterhouseCoopers LLP (PwC) and Mott MacDonald Limited, UK, trading as Cambridge Education as subconsultants, working with organisations including Nathan Associates London Ltd. and Social Development Direct Ltd (SDDirect). In addition to the Alliance Partners, FCDO directly recruits candidates into the FM.

The FM is responsible for the day-to-day operation of the GEC, including establishing the selection process, supporting applicants, sifting and scoring concept notes and proposals, evaluating value for money, making project funding recommendations for FCDO approval, and putting in place accountable grant arrangements/contracts with successful applicants (henceforth referred to as fund recipients). Once funding has been allocated, the FM is responsible for monitoring project progress against the accountable grant arrangement/contract and managing the relationship with projects.

## 1.1 Structure of the Fund Manager

The FM draws on technical expertise provided by all Alliance Partners with a global team spread across three continents. The GEC FM team is split between the UK and smaller regional presences in the countries where GEC projects operate. However, in times of crisis, some of our team members may be relocated to other parts of the world for their own safety, and work from 'home'.

Monitoring of fund recipients, including visits to project communities, is primarily done by Technical Monitors, Senior Portfolio Advisers (SPAs), Portfolio Advisers (PAs), and at times Regional Education Advisers (REAs) and Country Finance Monitors (CFMs). However, additional project visits are conducted on an ad hoc basis by the UK-based team, including Senior Management Team (SMT) members, the Finance team, the Learning team, the Evaluation team and the Safeguarding Team.

Recruitment to the FM is done primarily by the Alliance Partner responsible for that thematic area although there is some overlap in areas of responsibility. Each Alliance Partner is responsible for nominating and contracting candidates subject to PwC and FCDO approval.

# 2. Policy Introduction

## 2.1 Purpose

This safeguarding policy outlines the FM's Safeguarding Policies. All members of the FM should familiarise themselves with this policy and the more detailed policies and guidance it overarches. The FM recognises that at the heart of safeguarding abuses lies inequality and an abuse of those power differentials that that inequality affords. However, in order to be able to address different manifestations of safeguarding concerns, the FM has created multiple policies – each addressing different aspects of Safeguarding.

- Child and Adults at Risk Safeguarding Policy
- Protection from Sexual Exploitation, Abuse and Harassment Policy

- Protection from Sexual Exploitation, Abuse and Harassment at Work Policy
- Do No Harm Policy

For concerns regarding children and adults at risk, please refer to the *Child and Adults at Risk Safeguarding Policy*. For concerns regarding the sexual exploitation, abuse and harassment of beneficiaries and secondary beneficiaries of the GEC, see the *Protection from Sexual Exploitation, Abuse and Harassment Policy*. For concerns regarding the sexual exploitation, abuse and harassment of GEC staff members and Fund Recipients, see *Protection from Sexual Exploitation, Abuse and Harassment at Work Policy*. For information regarding the GEC's expectations of Fund Recipients and GEC staff and consultants to do no harm, refer to the *Do No Harm policy*.

For concerns regarding bullying and other forms of harassment, see Alliance Partners' individual Bullying and Harassment policies and see our policy statement below. For any concerns regarding allegations of illegal and improper conduct and wrongful acts including, but not limited to, suspected fraud, criminal activity, miscarriages of justice or mishandling of cases, please refer to Alliance Partners' and the FM's *Whistleblowing Policy*. Please also see information below regarding official whistleblowing options available should you wish to report the FM, Alliance Partner or Fund Recipient for any of the criteria listed above. For safeguarding guidance regarding communications, please see our guidance below.

The principal aim of the policy and subsequent practice is to protect beneficiaries and secondary beneficiaries from sexual exploitation, abuse and harassment perpetrated by FM staff and contractors. In addition, the policy also serves to protect staff and contractors as well as the reputation of PwC and the Alliance Partners, and FCDO.

The policy covers conduct issues for FM staff and contractors and sets out ways of working for Alliance Partners. All FM staff and contractors are also required by the policy to report any disclosure of sexual exploitation, abuse and harassment (including GBV, as defined by this policy) they come across as part of their interactions in project communities to the relevant project they are visiting.

The FM operates a zero-tolerance policy towards any breach of any of our safeguarding policies and code of conduct. The FM is committed to addressing all forms of abuse, whether physical, psychological, sexual abuse or child abuse in the form of neglect. This means that we take all concerns seriously and carry out timely and robust responses to allegations of breach of safeguarding policy. No one will be victimised for making a complaint and the FM is committed to working with complainants and survivors to ensure they are central to any response, are not further harmed or disempowered by any processes, and receive support throughout.

We recognise that all forms of Sexual Exploitation, Abuse and Harassment – as well as other Safeguarding Concerns – are rooted in power imbalances. Because of the gendered, racial, geographical and material power imbalances which are present in the international aid sector, the FM has a duty to ensure that the FM itself applies appropriate and robust mitigation, prevention and response measures and mechanisms - this policy is a part of a suite of policies and procedures which seek to operationalise that commitment.

We recognise that gendered forms of violence disproportionately affect women and girls, and this policy also recognises the impact that sexual exploitation, abuse and harassment can have on boys, men, and gender non-binary people. We further recognise that women and girls, who experience multiple forms of oppression due to identity, social and geographical determinants – are at increased risk of experiencing gender-based violence and sexual exploitation, abuse and harassment, by perpetrators with increased power. Most often, perpetrators of violence are men – however, more rarely, perpetrators may be women.



We recognise that staff members of the Fund Manager have increased power and privilege and we are committed to safeguarding all people who come into contact with the FM through our work in both humanitarian and development contexts from abuse of that power and privilege.

Lastly, this policy also references the GEC's ways of working on safeguarding with Fund Recipients. Communicating the ways of working clearly to projects and FM Staff and contractors is key to operationalising and socialising our safeguarding policy framework. Guidelines can be found in section 5 of this document.

These guidance documents can be downloaded individually and are also referenced in the *Grant Recipient Handbook*.

## 2.2 Scope

The policy covers all personnel (referred to throughout the policy as 'staff and contractors') employed or engaged by the FM in any activity related to the GEC, whether as staff or contractors or in any other paid or unpaid position, full time or part time.

This policy does not cover GEC fund recipients. GEC fund recipients are expected to have their own policies and processes in place to safeguard children and adults at risk that they come into contact with. Annex 2 outlines the FM's minimum standards in relation to fund recipients.

## 2.3 Alliance Partner compliance

The GEC alliance requires all staff and contractors to work in ways that are consistent with the principles and practices described in this policy. It is the responsibility of the contracting Alliance Partner to make sure that they put in place processes and systems that are compatible with this policy and that adhere to the GEC's own minimum standards on safeguarding. Compliance of all the Alliance Partners may be monitored and reviewed by PwC as leader of the alliance throughout the course of the GEC contract.

The FM will make fund recipients aware of its policy in order that they may hold FM staff and contractors accountable as appropriate.

**The policy takes precedence over the policies of all GEC Alliance organisations in relation to their work on the GEC programme.**

**All staff and contractors are required to report any actual or suspected breaches of this policy to their GEC line manager and/or to the GEC Safeguarding Lead ([nancy.abwola@girlseducationchallenge.org](mailto:nancy.abwola@girlseducationchallenge.org)) or through the whistleblowing mechanism - [uk\\_gec\\_pmo@pwc.com](mailto:uk_gec_pmo@pwc.com) or if they feel uncomfortable reporting in this way, or if they would prefer to report anonymously.**

### 3. Policy statement and commitments

The FM is committed to the safety and protection of all beneficiaries and secondary beneficiaries and intends that their welfare will at all times be the paramount consideration. The FM recognises that power differentials put in place either through systemic, societal-level oppressions or through institutional structures and hierarchies – mean that some women, men, boys and girls have more power than others. Power differentials may be abused by those with more power, against those with less power. Systemic and societal-wide oppressions exist, play out and replicate in every context, and may vary according to time and location. However, an inexhaustive list of identity-based determinants of oppression are gender, gender identity, sexual orientation, ethnicity, disability status, age and whether someone is from the global-North or global-South (post-colonial narratives). Geographical determinants (such as rural, remote, urban, displacement, access to services, pollution and climate change), and social determinants (such as income and income distribution, education, job security, working conditions, early childhood experiences, food security, health and housing) also increase or decrease opportunity for abuse of power by a perpetrator. It is important to remember that many of these determinants of oppression are interlocking. The more identity-based, social and geographic determinants an individual experiences, the less power they are likely to have.

The FM has a particular focus on protecting girls given the work it is supporting. Girls are especially vulnerable and at risk from certain forms of harm, including gender-based violence, due to their dual vulnerability of the intersection of their gender and age. Adolescent girls are at an even greater risk than other girls, as at this time in their lives they may be starting to explore their sexuality and be under increased pressure to engage in harmful traditional practices, such as child marriage and female genital mutilation.

The FM recognises that violence against women and girls is deeply rooted in the patriarchal system of power, and further recognises that where high levels of violence against women and girls exists, violence against individuals based on sexual orientation, gender identity and other social determinants also exists and thrives. Therefore, a large aspect of the FM's work on protection from sexual exploitation, abuse and harassment is to work proactively towards gender equality.

The GEC Alliance recognises that violence, discrimination and abuse against girls limits their access to education. As such the FM is particularly concerned that girls do not experience (directly or indirectly) physical, emotional or sexual violence, neglect or any other form of harm as a result of their engagement with the GEC programme.

#### **3.1 Summary of The GEC Child and Adult at Risk Safeguarding Policy**

This safeguarding policy sets out the FM's position on working with children and adults at risk and keeping them safe from harm through all of its activities.

The principal aim of the policy and subsequent practice is to prevent the risk of harm to children and adults at risk as a result of their contact with FM staff and contractors. In addition, the policy also serves to protect staff and contractors as well as the reputation of PwC, and the Alliance Partners, including FCDO.

The policy covers conduct issues for FM staff and contractors and sets out ways of working for Alliance Partners. All FM staff and contractors are also required by the policy to report any disclosure of abuse they come across as part of their interactions in project communities to the relevant project they are visiting.

### **Child and Adults at Risk Safeguarding Key Policy Position**

**The Fund Manager will not tolerate any form of abuse, exploitation, or harm carried out towards children (defined as anyone under the age of 18) or adult at risk. We operate a zero-tolerance approach.**

**Every aspect of our work must be carried out in a way that ensures the rights, dignity and empowerment of children and adults at risk. We are committed to engaging with children in a way that recognises their agency, individuality, and value.**

## **3.2 Summary of The GEC Protection from Sexual Exploitation, Abuse and Harassment Policy**

This safeguarding policy sets out the FM's position on protecting GEC beneficiaries and secondary beneficiaries, from sexual exploitation, abuse and harassment.

The principal aim of the policy and subsequent practice is to protect beneficiaries and secondary beneficiaries from sexual exploitation, abuse and harassment perpetrated by FM staff and contractors. In addition, the policy also serves to protect staff and contractors as well as the reputation of PwC and the Alliance Partners, including FCDO.

The policy covers conduct issues for FM staff and contractors and sets out ways of working for Alliance Partners. All FM staff and contractors are also required by the policy to report any disclosure of sexual exploitation, abuse and harassment (including GBV, as defined by this policy) they come across as part of their interactions in project communities to the relevant project they are visiting.

### **Protection from Sexual Exploitation, Abuse and Harassment Key Policy Position**

**The Fund Manager will not tolerate any form of abuse, exploitation, harassment, or gender-based violence perpetrated by our staff or contractors anywhere. We operate a zero-tolerance approach.**

## **3.3 Summary of The GEC Protection from Sexual Exploitation, Abuse and Harassment at Work Policy**

This safeguarding policy sets out the FM's position on protecting GEC staff members, contractors and Fund Recipients, from sexual exploitation, abuse and harassment perpetrated by GEC personnel.

The principal aim of the policy and subsequent practice is to protect staff members, contractors and Fund Recipients from sexual exploitation, abuse and harassment perpetrated by FM staff and contractors. The policy serves to protect staff and contractors as well as the reputation of PwC and the Alliance Partners, including FCDO.

The policy covers conduct issues for FM staff and contractors and sets out ways of working for Alliance Partners. All FM staff and contractors are also required by the policy to report any disclosure of sexual exploitation, abuse and harassment (including GBV, as defined by this

policy) they come across as part of their interactions in project communities to the relevant project they are visiting.

### 3.4 Summary of The GEC Do No Harm Policy

This policy provides specific guidance on the ways in which GEC fund recipients and the FM must apply Do No Harm to their work. It also considers some additional policy issues such as what to do if a Do No Harm issue is identified and the education and training needs of staff. The FM is committed to considering Do No Harm principles across its activities.

#### **Do No Harm Policy Position**

**The Fund Manager and Fund Recipients have a responsibility to Do No Harm in the communities where GEC operates, or to individual beneficiaries or secondary beneficiaries.**

### 3.5 The GEC's Safeguarding and Communication Guidance

The FM may occasionally use images or videos of children, adults and adults at risk in our external communications such as brochures, publications and social media. This may be to raise awareness of the issue of girls' education or to illustrate achievements or learning across the portfolio. When doing so we will adhere to the following guidelines:

- 1. Adequate consent is sought from the child/adult at risk/adult and the parent/guardian (where needed) using the consent form in Annex 4. This needs to be shared with Clare Convey ([clare.convey@girlseducationchallenge.org](mailto:clare.convey@girlseducationchallenge.org)) before the image can be used.**

The informed, oral consent of the child and parent/guardian should always be obtained before a photograph, image or recording of a child is used, and its intended and/or possible use(s) explained. This includes when it is being used on social media. As far as possible written consent should also be obtained but this may not be possible if levels of literacy are low. The implications of using images, including risks and possible negative consequences, especially where images may be used on websites, should be fully explained to the subject of the media and their parent/caregiver (where appropriate). The consent form in Annex 4 should be used for obtaining consent from children where possible, the child and family should be shown the image before it is published. Adults should similarly sign the consent form.

**Group photographs and recordings:** As with individual photographs or recordings, it should be explained to the group what the photograph/recording will be used for and consent sought from individuals in the group including their parent/guardian. Any individuals who wish to opt out (or in the case of children/adults at risk whose parent/guardian wish them to opt out) should be allowed to do so.

**General photographs and recordings:** Where using images of children in crowd scenes where it may be difficult or impossible to get consents, the following should be taken into consideration:

- Is there a risk that the image could put the child at risk of in any way? (e.g., could their exact location be made known)
- Would the children attending the event expect photographs/recordings to be taken?
- Would children in the photograph/recording probably consider themselves to be in a public place, with no expectation of privacy?

- Do you think it unlikely that anyone would object to the photograph being taken? (An individual could be in a public place but may not want any images in which they are present being used).
- Where photographs/recordings are being taken at a planned event, as far as possible individuals should be told in advance that cameras will be being used and how the photos will be used, in order that they can opt out of the event or notify organisers that they do not wish to be featured in any photographs.

The FM will only use images from Fund Recipients that meet these standards. Where fund recipients have not obtained consent in line with the above standards the FM will not use their photographs/recordings/videos for GEC promotional material.

## **2. Risks associated with images/recordings are assessed before they are taken and again before they are used in internal and external communications.**

The FM will not publish personal information that could be used to identify the specific location of a child. Personal information about a child (such as full name, date of birth, or names of family members) or location information (such as village or community names, school, parish, etc.) should not be used, especially where this is linked to an image. The maximum information provided externally or internally when using an image about a child is first name and name of the district in which they live.

Children that have experienced violence, exploitation, have been otherwise abused or are in some way particularly vulnerable or at risk if identified, should not have their faces displayed or in any other way be represented in a way that may lead to their identification. Images of children are never to be used in association with written text about sexual violence. The same applied to adults without their express permission that this association is something they are comfortable with, and they provide informed consent for this to happen.

Staff and contractors working for the FM will not publish photos from the GEC on their own personal social networking sites unless they refer to the wider communication material produced by the FM.

Images or recordings of children in states of undress should not present them in poses that could be interpreted as sexually suggestive or in ways that impact negatively on their dignity or privacy.

All images, recordings and stories, along with accompanying details of individuals, shall be used and kept in accordance with relevant data and privacy laws. This includes that:

- Images are stored securely (e.g. lockable safe/cabinet, electronic files password protected, limited access etc.);
- Images are destroyed two years after the date on the consent form unless further consent is agreed and not used in any further publications.

## **3. Photographers/writers contracted by the FM must also abide by the guidelines outlined here**

In addition, independent photographers and writers commissioned as contractors/consultants to be in contact with children are subject to the safeguarding policies in place within the GEC - including the need for recruitment checks and measures prior to commencing their assignment. This means that where possible criminal records are checked, references are sought, compliance with safeguarding policies is written into the contract, and a copy of the Policies, Code of Conduct and these guidelines on the use of images and stories are provided.

As far as possible, children and their parents/guardians should be prepared and be given guidance on interaction with the media – what is acceptable and unacceptable and what steps

to take if they have a complaint regarding inappropriate use of images or the manner in which the images have been taken.

#### **4. The above principles also applies to personal photography**

Visitors and anyone else visiting GEC funded programmes should be made aware that taking photographs, even if only for personal use, may be sensitive and cause offence or discomfort. The principles described herein apply just as much to personal photography, permissions are required and personal photos and stories must not be published, e.g. via social media, personal blogs, etc.

**Any concerns regarding inappropriate use of the images of children should be reported in accordance with the normal process for a breach of the safeguarding policy, i.e. to your line manager or through the whistleblowing mechanism [uk\\_gec\\_pmo@pwc.com](mailto:uk_gec_pmo@pwc.com)**

#### **Summary Guidance:**

- Images of children must not show them in states of undress or in inappropriate poses.
- Details attached to images and included in stories must not allow that child to be traced to his or her home or community.
- Distinctive buildings, street signs or landmarks should not be included in an image if they identify where a child lives or works.
- Geotagging of images should be disabled when taking photographs.
- Ensure the photographer/journalist/translator you have employed has been properly vetted and reference checked.
- Make sure you have been given permission by children and their parents/carers to take their image and use their information.
- Images of children are never to be used in association with written text about sexual violence. The same applied to adults without their express permission that this association is something they are comfortable with, and they provide informed consent for this to happen.

### **3.6 The GEC's Bullying and Harassment Statement**

The FM values a safe and inclusive work environment for all staff and expects that all FM staff and associates treat other with dignity and respect. Further, staff members and contractors should reflect on their positionality (the power and privilege they hold due to identity, social, geographical and organisational determinants) in order to avoid inadvertent abuse of that power, and to mitigate against purposeful abuse of that power.

Staff and contractors should refer to their Alliance Partner bullying and harassment policy (or equivalent) as well as their Alliance Partner Grievance Policy, and should adhere to this policy and the behaviour protocols it outlines. However, within the FM, many of our staff and contractors are 'seconded' (or similar) into the FM team. The FM therefore has a duty of care to our staff and contractors.

#### **The FM will:**

- Provide a safe and inclusive workplace where all staff and associates are treated with dignity, courtesy and respect;
- Provide a workplace where equality and inclusion are integral to how we work, which creates a positive environment and culture for us all;
- Ensure all acts of bullying, victimisation or retaliation are investigated appropriately by the Alliance Partner.

### **FM staff and associated contractors must not:**

- Use offensive, derogatory language or intimidating actions or behaviours.
- Insult or use threatening gestures, language (overt or implied) or continual and unwarranted.
- Be physically or emotionally abusive in any way.
- Shout at any staff members, contractors or Fund Recipients.
- Use unjustified and/or unnecessary comments about a person's work or capacity for work.
- Openly display pictures, posters, graffiti, written materials, emails or digital media which might be offensive to some.
- Place phone calls or send messages on voicemails or electronic mail or computer networks which are demeaning, threatening, abusive, humiliating, or offensive to staff.
- Persistently follow or stalk within the workplace, or to and from work.
- Exclude a person, or group, from normal conversations, work assignments, workplace updates, information, resources, meetings, work related social activities and networks in the workplace.
- Assign impossible tasks or deadlines, meaningless tasks unrelated to their job, or give an individual the majority of unpleasant tasks.
- Undermine an individual's responsibility.
- Withhold information which is essential to completing a task properly.
- Copy (cc) emails that are critical about someone to others, who do not need to know.
- Use blind copy (bcc) on emails inappropriately.
- Make threats or comments about job security without foundation.
- Change workplace arrangements to inconvenience a particular employee.
- Excessively scrutinise a person's work.
- Spread malicious rumour.
- Cyber bully.

*Please note that harassment may come in the form of sexual harassment. This form of harassment is covered within the GEC's Protection from Sexual Exploitation, Abuse and Harassment at Work policy.*

### **3.7 Other Channels for Whistleblowing**

For the GEC's overall approach to whistleblowing, please see the *GEC's Whistleblowing Policy*. This outlines the routes for reporting and what to report if you are reporting internally.

Whistleblowers are workers who report wrongdoing. This will usually be something they have seen at work – though not always. Whistleblowers are protected by law – they should not be treated unfairly or lose their job because they 'blow the whistle'. Concerns can be raised at any time about an incident that happened in the past, is happening now, or believe will happen in the near future. Personal grievances, such as bullying, harassment or discrimination are not covered under whistleblowing policies. Whistleblowing covers matters that are in the public interest only.

The term **whistleblower** has some negative connotations, however, whistleblowing is really 'making a disclosure in the public interest'. The FM welcomes whistleblowers and encourages staff, contractors and Fund Recipients to report.

#### **External Reporting**

Where someone feels the FM or a Fund Recipient has not responded appropriately to a whistleblowing report, or where you feel that there are issues occurring which could seriously harm: the people we work with; our staff and volunteers; our assets; the GEC or FCDO's reputation – and they do not trust that normal whistleblowing reporting mechanisms are

appropriate, or where they feel we have mishandled the report – there are other options available to them.

- Report to FCDO: you can report to FCDO directly at [reportingconcerns@fcdo.gov.uk](mailto:reportingconcerns@fcdo.gov.uk)
- You can inform the police about a crime or if you are worried about someone's safety.
- If you need advice about blowing the whistle on a charity call [Protect](#)'s free and confidential advice line: +44 020 3117 2520

It should be noted that the GEC has a zero-tolerance policy to retributive action. Similarly, we have zero tolerance policy to malicious reports.

## 4. Safeguarding Measures

The FM will safeguard staff, contractors, Fund Recipients and beneficiaries through the following measures.

### 4.1 Safe recruitment

Building safe environments within organisations relies on the appointment of suitably qualified and skilled staff that have the appropriate values, attitudes and approach to sexual exploitation, abuse and harassment.

The GEC Alliance Partners shall have recruitment processes in place such that only staff meeting these criteria are employed or contracted by the FM. These processes shall contain measures that aim to deter and detect anyone that may pose a risk to our beneficiaries and secondary beneficiaries or put them at risk. All Alliance Partners shall put systems in place that include at least the following safe recruitment measures whether they are recruiting for staff or contractors within the FM:

- Assessment of the role for the type and frequency of potential contact with beneficiaries or secondary beneficiaries or access to sensitive data.
- Applicants to be advised of their responsibilities towards protection from sexual exploitation, abuse and harassment and for roles likely to have contact with beneficiaries or secondary beneficiaries, applicants to be assessed on their awareness of child safeguarding and safe practices via standard questions at interview.
- All successful applicants shall be required to provide background checks prior to onboarding. For British or UK based staff and contractors that will include either a Disclosure and Barring Service (DBS) check or International Child Protection Certificate (ICPC). For non-British staff and contractors Alliance Partners will strive towards securing a criminal record check, however, it is acknowledged<sup>2</sup> that this will not always be possible.<sup>3</sup> Where a criminal background check is not possible, further references will be required, as well as a self-declaration confirming that the individual does not have a criminal record (see Annex 5).
- All references are to be checked by contacting the Human Resources of the organisation/company listed (where the referee is not a member of the Human Resources team) to confirm employment. For roles that will work with/have contact with children, applicants' referees shall be specifically asked to provide a view on the candidate's suitability to be working/in contact with children.

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<sup>2</sup> Where it is not possible to obtain such assurances, details of efforts that have been undertaken will be recorded and a judgement made on suitability for employment based on other supporting information.

<sup>3</sup> The FM will follow the guidance on criminal record checks issued by the home office where it is possible <https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>. It may be that in some situations applicants will need to be responsible for obtaining their own checks.



- Where a criminal background check is not possible, Human Resources of previous employers are to be contacted and asked about the candidate’s employment record at the organisation. Where prospective candidates will be working with/having contact with children and/or adults at risk, and where a criminal record check has not been possible, the contracting or employing organisation requires that they sign a personal disclosure form declaring that there is no reason why they should be excluded from working on their prospective role.
- Where a criminal record check indicates that a successful applicant is unsuitable for that role, no job offer will be made, or any existing job offer withdrawn.
- All background checks and references are to be in place *prior* to an individual taking on a role. The individual should be made aware that the offer is provisional, and the final decision will be based on information references and criminal record checks.
- All DBS and/or ICPC background checks are to be conducted for FM staff members and contractor on an annual basis. Where checks are not possible due to the nationality, or location of the staff or contractor, individuals should sign a self-declaration on an annual basis.

**Table 1: The likelihood of having contact with children and adults at risk**

| <b>Level 1: Low</b>   | <b>Level 2: Medium</b>  | <b>Level 3: High</b>   |
|---|---|--|
| (less than once per year)   | (once per year)   | (more than twice per year)   |
| <ul style="list-style-type: none"> <li>• Finance, Operations, Learning and VfM team</li> <li>• Workstream support staff</li> <li>• Interns</li> </ul> | <ul style="list-style-type: none"> <li>• Senior Management Team</li> <li>• Evaluation Officers</li> </ul> | <ul style="list-style-type: none"> <li>• Technical Monitors</li> <li>• Country Finance Monitors</li> <li>• Senior Portfolio Advisers</li> <li>• Portfolio Advisers</li> <li>• Regional Education Advisers</li> </ul> |

All GEC roles in Tiers 1, 2 or 3 are in scope for a criminal records background check.

Should an Alliance Partner outsource FM related work to a third-party organisation, it shall take steps to make sure that the organisation and its personnel working on the GEC comply fully with the measures and obligations that the Alliance Partner has with respect to this policy.

## 4.2 Education and training of staff and contractors

The FM understands that, in order for the Protection from Sexual Exploitation, Abuse and Harassment Policy to be well understood and effectively implemented, it is essential that there are high levels of awareness regarding the policy and that staff and contractors are clear and confident in their roles and responsibilities in putting the policy into practice.

The following training plan for staff and contractors has been put in place by the FM to make them aware of this policy.

**Table 2: Training across the FM**

|  |   |
|--|---|
| New joiners (including consultants/contractors working on discreet pieces of work) | <ul style="list-style-type: none"> <li>• The Programme Coordinator organises inductions for all new joiners and will incorporate safeguarding policies and procedures within this.</li> <li>• The Programme Coordinator will be supported during inductions and any additional training by the</li> </ul> |
|--|---|

|   |   |
|---|---|
|   | <p>SPA/Safeguarding Lead upon request and as appropriate.</p> <ul style="list-style-type: none"> <li>• It is the responsibility of an individual's line manager to ensure that they have received an appropriate induction and this should be recorded on the tracker.</li> </ul>   |
| Existing staff (part-time, full-time and regular contractors) | <ul style="list-style-type: none"> <li>• Annual Safeguarding Refresher Training covering this policy, other Safeguarding-related policies, reporting and other safeguarding basics (including power and ethics)</li> <li>• Other ad-hoc training to be scheduled in response to identified needs as required, for example in response to updates to this policy</li> <li>• The policy will be circulated periodically and particularly during periods of high travel volume as a reminder to staff and contractors</li> </ul> |

### 4.3 Code of conduct

The FM's Code of Conduct (see Annex 3), lists prohibited and expected behaviour of all staff members, contractors and managers in relation to the FM's Safeguarding Policies. The Code of Conduct is not an exhaustive list and should be interpreted in a spirit of common sense.

The Code of Conduct applies to conduct in both staff's professional role and in their personal lives. GEC Alliance staff and contractors always represent the FM, and as such you will never be entirely 'off duty'. Standards of behaviour therefore apply both inside and outside of working hours, i.e., 24 hours a day. If a breach of the code of conduct, or the principles within this or any other associated FM Safeguarding Policy is reported to the FM, it will be handled in the same way whether the alleged incident occurred inside or outside of working hours.

### 4.4 Reporting safeguarding concerns

The FM is committed to responding effectively, sensitively and swiftly to all allegations and suspicions of breach of Code of Conduct and this policy. The FM places a mandatory obligation on all staff and contractors to immediately report concerns, suspicions, allegations and incidents that indicate actual or potential breach of our Code of Conduct or Safeguarding Policies and undertakes to take appropriate action in response to any such reports.

The FM welcomes staff from GEC Fund Recipients sending complaints regarding FM staff or contractors' behaviour or the behaviour of colleagues or other GEC project associated personnel. Reports from outside of the GEC, about FM staff can be reported to any GEC member of staff and/or to the GEC Safeguarding Lead ([nancy.abwola@girlseducationchallenge.org](mailto:nancy.abwola@girlseducationchallenge.org)) or through the whistleblowing mechanism – [uk\\_gec\\_pmo@pwc.com](mailto:uk_gec_pmo@pwc.com) – if the reporter would prefer to remain anonymous. The FM will also accept complaints from external sources such as members of the public, Fund Recipients and official bodies.

Details of reporting mechanisms are widely publicised (these are described below and in further detail within our Standard Operating Procedures for reporting and responding to safeguarding concerns).

## 4.5 Confidentiality

The FM understands the importance of maintaining confidentiality at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need-to-know basis only, and should be kept secure at all times. Breach of confidentiality, for anything other than appropriate case management/handling or for whistleblowing purposes where an individual feels that the case has not been handled appropriately, is a breach of this policy and code of conduct. If breach of confidentiality is reported to the FM, it will be treated in the same way as other safeguarding concerns.

## 4.6 Case handling

All FM safeguarding policies, procedures and guidance must be adhered to – in addition to the FM Code of Conduct. Failure to do so will result in disciplinary measures. Anyone accused of a breach of the Child and Adult at Risk Safeguarding Policy, PSEAH Policy, the PSEAH at Work Policy or the Bullying and Harassment Statement contained within the Overarching Safeguarding Policy, will be suspended from working in the FM until an investigation can take place.

If a concern is substantiated – where on the strength of the evidence presented it is in all likelihood probable that the incident/s took place – the wrongdoer will be immediately dismissed from the GEC and further disciplinary measures from the Alliance Partner contract holder for that member of staff may occur.

If a concern is found to have been raised maliciously by a staff member or contractor of the FM, this will be seen as an act of gross misconduct and lead to immediate dismissal from the GEC and further disciplinary measures from the Alliance Partner contract holder for that member of staff may occur.

Where the concern raised is in regards to actions within the Code of Conduct (which are not listed in the Child and Adult at Risk Safeguarding Policy, the PSEAH Policy or the PSEAH at Work Policy), this will be referred to the Alliance Partner who holds the contract for the potential wrongdoer.

The FM places a mandatory reporting obligation on all staff and contractors to immediately report any concerns, suspicions, allegations and incidents that indicate actual or potential breach of code of conduct or of this policy. Wilful or negligent failure to do so is grounds for disciplinary procedures.

The reporting process is illustrated in Annex 6 of this document. FM staff and contractors may report their concerns via email, telephone, or in person to their GEC line manager or any member of the GEC senior management team. They may also report to the Safeguarding Lead ([nancy.abwola@girlseducationchallenge.org](mailto:nancy.abwola@girlseducationchallenge.org)). If for any reason it is not possible to report using these routes, reports may be made through the GEC whistleblowing email address [uk\\_gec\\_pmo@pwc.com](mailto:uk_gec_pmo@pwc.com). This email account is accessible only by a small number of individuals who have been trained on the requirement to keep the information confidential. The FM will follow up matters on an anonymous basis and are committed to investigate claims thoroughly and fairly. Again, reports can be made anonymously.

Annex 1 contains a template that may be used by those reporting a potential safeguarding incident. The use of this template is preferred in order that as much relevant information is captured, but it is not mandatory. Inability to complete the template should not prevent staff and contractors from reporting any potential incidents by other means.

Concerns relating to issues in a fund recipient organisation, any of its consortium members or implementing Fund Recipients/contractors will be referred to the relevant senior contact of the lead recipient organisation for their investigation. The PMO is responsible for keeping an up to date contact for this.

Any investigations involving FM staff or contractors will be handled by the Alliance Partner who holds their contract and according to the investigation procedures which that Alliance Partner had put in place.

In addition, each report is logged on our online system, SHE. For further information on this system please see Section 5 of this document. This allows the FM to track concerns, issues and cases and understand any potential patterns which may indicate serious review of policies and procedures.

### **Immediate responses**

The safety and wellbeing of the survivor is the paramount consideration and immediate steps must be taken as necessary to protect them and to address any possible urgent medical needs. Line managers should know where to refer staff and contractors who disclose experiencing or witnessing breaches of the code of conduct and safeguarding policies to receive health, legal and psychosocial support. Alliance Partners should engage with psychosocial service providers to ensure that staff and contractors who have experienced primary, secondary or vicarious stress, distress and trauma have access to free, qualified services.

Where it appears that a breach of the national criminal code may have taken place, the matter will be referred to the appropriate national authorities in line with local reporting/referral systems - where it is safe to do so for the survivor. If the survivor is a child, the decision to refer must be made in the best interest of the child and with participation from the child in accordance with their maturity level. If the survivor is an adult, information shall be given to the survivor about services which are available to them and the pros and risks of receiving that service. Some contexts require mandatory reporting to the police. This should be followed for children only and confidentiality may only be breached for adults where the survivor's life may be at risk from themselves or from others.

### **Jurisdiction of the UK courts**

UK Government policy generally on the jurisdiction of UK courts is that criminal offending is best dealt with by the criminal justice system of the state where the offence occurred. If an accused person is not prosecuted in the state where the offence occurred, a prosecution would only take place in the UK if the accused person were physically present in this jurisdiction (following extradition if necessary), there is sufficient evidence to provide a realistic prospect of conviction and it is in the public interest to prosecute.

The UK courts have extraterritorial jurisdiction over the following relevant offences:

- Murder and manslaughter in most circumstances;
- Sexual offences where the survivor of the crime is under 18;
- Forced marriage;
- Female genital mutilation

Sexual offences where the survivor of the crime is over the age of 18 currently are not covered under extraterritorial jurisdiction.

As with all criminal offences, the decision to prosecute would be a matter for the relevant prosecuting authority. Where a crime has been committed outside of the UK, police should be informed within that country (where safe to do so for the survivor). Where the person of concern is still within that jurisdiction and they have committed an act which breaks that jurisdiction's law, they should face prosecution within that jurisdiction. The FM shall not take responsibility for FM staff and contractors who are accused of a breach of this policy and are in contravention of the law where the alleged incident took place, and no repatriation or legal fees will be covered.

## 4.7 Mitigation measures

The FM charges all line managers to make their staff aware of the policy and to work in accordance with it, as well as creating a management culture that encourages a focus on protection from sexual exploitation, abuse and harassment, as well as all forms of GBV. Further, line managers are to be aware of gender, race, sexual orientation and other equality issues, and the way in which they may intersect. This is to ensure that they are sensitive to these issues and fully aware of both the types of power they may hold as an individual so as not to inadvertently abuse that power.

All staff and contractors are obliged to create and maintain an environment that prevents sexual exploitation, abuse and harassment, as well as all forms of GBV. However, line managers at all levels have a particular responsibility to support and develop a culture and system that maintain a culture of zero tolerance for misconduct.

The PwC Engagement Partner for the GEC, Zlatina Loudjeva, is ultimately responsible for managing effective implementation of the programme and its policies and ensuring that the FM team is sufficiently supported to carry out its responsibilities. Responsibilities for implementation of the policy are spread across numerous teams and individuals. The Safeguarding Lead is responsible for building the capacity across the different teams to implement this policy and quality assuring processes across different teams, while SPAs will be designated as focal points for implementation of the policy at the regional level. PMO will be responsible for record keeping and coordination with Alliance Partners.

The FM also operates extensive risk management processes to make sure that a wide range of risks across the whole GEC programme are addressed. Assessing and mitigating the risk of harm to beneficiaries and secondary beneficiaries, as a result of any the GEC Alliance funded activity, is integrated into key stages of procurement, programme implementation, monitoring and evaluation processes.

## 4.8 Data protection and security

The FM recognises its obligations to process data in line with existing relevant data protection legislation such as the General Data Protection Regulation (GDPR) including a duty to protect personal data against any unauthorised or unlawful processing and any accidental loss or destruction of, or damage to, the personal data.<sup>4</sup>

## 4.9 Monitoring and review of this policy

The FM reviews the implementation of this policy on an annual basis to maintain its consistent reflection of good practice and learning from GEC's changing and evolving environment.

The Safeguarding Lead, together with PMO and SPAs, is also responsible for maintaining adequate records to provide evidence of implementation across the FM.

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<sup>4</sup> described in clause 6.1 of the service acquisition agreement, signed by the Alliance members contracted to PwC

## 5. Fund Recipient Safeguarding

### 5.1 Guidelines for Reporting

The SHE system is an online platform used to report and track progress on Safeguarding Concerns related to the FM. It is also used for similar purposes for finance concerns and security concerns.

The full guideline for how to use the online system can be found in [here](#).

#### **Safeguarding Technical Guidance**

##### *Initial Report:*

Please include as much detail as possible in the initial report. In particular:

- Demonstrate a survivor-centred approach to your work and provide details on the wellbeing and safety of the alleged survivor, as well as any referrals made to the alleged survivor.
- Provide details regarding the alleged wrongdoer and their status regarding the project – are they a member of staff or paid for by the project?

Providing this information will mean fewer actions are raised within the SHE system regarding the case.

**All Fund Recipients are required to notify the FM of safeguarding concerns within 24 hours of receiving a report.**

The FM expects that reports are made to them regarding the concerns listed below.

| Category | Definition   | Reporting lines   | Placed on tracker held by (FM-only column) | Escalation (FM-only column)   |
|----------|--|---|--|---|
| 1        | Concerns involving FM staff and contractors (breach of FM's safeguarding policy) as the alleged wrongdoer.   | Line manager and then PMO or directly to PMO.<br><br>May also be received via whistleblowing email/phone.             | Safeguarding Lead<br><br>Fund Lead         | Relevant members of SMT immediately<br><br>Alliance Partner contract holder<br><br>FCDO as necessary if concern is a breach of code of conduct (as opposed to a breach of communications guidelines or data protection).<br><br>Must be reported within 24 hours of concern being raised with PMO.<br><br>Safeguarding Lead also to be notified to gather lessons learned from the incident.<br><br>Staff member or contractor immediately suspended from GEC work pending investigation. |
| 2        | Concerns involving fund recipients (lead partners, consortium partners, implementing partners, contractors) staff, contractors or volunteers as the alleged wrongdoer.   | Projects to SPA, PMO and Safeguarding Lead on SHE system.<br><br>May also be received via whistleblowing email/phone. | PMO and Safeguarding Lead                  | Relevant members of SMT, SPA, and FCDO immediately (within 24 hours)  |
| 3        | Category 3 is broken into two types of concerns. The concerns listed below are concerns where the Fund Recipient has a duty of care to respond, but where there is no responsibility to investigate.<br><br>1. Concerns involving government teachers or other agency staff/contractors as alleged wrongdoer in schools or other institutions or project sites where GEC activities take | Projects to SPA, PMO and Safeguarding Lead on SHE system.<br><br>May also be received via whistleblowing email/phone. | PMO and Safeguarding Lead                  | Relevant members of SMT, SPA, and FCDO immediately (within 24 hours)  |

|  |  |  |  |  |
|--|--|--|--|--|
|  | <p>place and/or where teachers are/have been provided with GEC support. Here, the FM expects that Fund Recipients will advocate for appropriate handling of the case by authorities, ensure that the survivor receives appropriate referral, and work with the school (or other educational institution) to strengthen their safeguarding prevention, mitigation, reporting and response work. This type of case must be reported to the FM where there have been concerns raised or reports of the following:</p> <ul style="list-style-type: none"> <li>- Severe acts of physical violence or threat of physical violence which has, or is likely to, cause injury. Examples include: hitting, slapping, choking, shoving, burning, use of a stick/other weapon or any other act which results in pain discomfort or injury.</li> <li>- Sexual abuse.</li> <li>- Child exploitation, child labour or worst forms of child labour (including trafficking)</li> </ul> <p>For issues of general corporal punishment, this does not need to be reported to the FM as a concern where the above criteria do not apply, unless the project consider the issue to be high risk to person, project or donor.</p> <p>2. Broader violence against girls, violence against women and violence against children concerns and cases should only be reported to the FM where there is a need for support from the Fund Recipient. Fund</p> |  |  |  |
|--|--|--|--|--|



|   |  |  |                           |  |
|---|--|--|---------------------------|--|
|   | Recipient's are reminded that they have a duty of care to the survivor and should make appropriate referrals following their own referral pathways or the relevant national/local standard operating procedures for referral of survivors of broader child protection or violence against women and girls incidents.   |  |                           |  |
| 4<br>(Design or implementation problem) | <p>A situation where the design or implementation of a project gives rise to harm. Harm may have already occurred or may be likely (reporting of design or implementation problems are encouraged to take place before harm has been caused in order to prevent harm from taking place). Harm may be caused intentionally or unintentionally by the project's implementation.</p> <p>Harm can be in the form of interpersonal violence, in the form of increased risk to violence (for example community and individual backlash not being taken into account in programmes and mitigated against; safeguarding reporting mechanisms not being in place; promotion of GBV-related communication material without appropriate services in place. Other forms of harm that may be caused by the design or implementation of a project may be increasing conflict and fragility in a context. Or implementing in buildings or in areas that increase the risk of harm to beneficiaries of the GEC – either due to</p> | <p>Projects to SPA, PMO and Safeguarding Lead on SHE system.</p> <p>May also be received via whistleblowing email/phone.</p> | PMO and Safeguarding Lead | Relevant members of SMT, SPA, and FCDO immediately (within 24 hours) |

|   |   |   |                           |  |
|---|---|---|---------------------------|--|
|   | health and safety reasons or protection concerns.   |   |                           |  |
| 5 | Health and safety concern raised concerning infrastructure or physical danger.  | Projects to SPA, PMO and Safeguarding Lead on SHE system. | PMO and Safeguarding Lead | Relevant members of SMT, SPA, and FCDO immediately (within 24 hours)   |
| 6 | Concerns raised through monitoring and evaluation work which are generalised (not related to a specific identifiable incident/incidents), e.g. prevalence of corporal punishment raised through household surveys generalised complaints of sex for grades in focus groups. | Projects to SPA, PMO and Safeguarding Lead on SHE system. | PMO and Safeguarding Lead | Relevant members of SMT, SPA, and FCDO immediately (within 24 hours)   |
| 7 | General GBV and Child Abuse cases where survivors are girls taking part in our projects (serious incidents reported – all survivors should be appropriately referred to services).  | Projects to SPA, PMO and Safeguarding Lead on SHE system. | PMO and Safeguarding Lead | Relevant members of SMT, SPA, and FCDO immediately (within 24 hours)<br><br>Category 7 exception cases are not immediately reported to Reporting Concerns (unlike all other categories). They are first sent to Will Ramsden, Willie Taylor and George McLaughlin for their awareness, and Will Ramsden (SIT Manager) makes a determination on whether the case should be formally reported. |

### *Part 1 (Incident Details and Immediate Actions):*

The first part of our reporting form includes a number of different questions which are important for the FM to know, and also act as a reminder to Fund Recipients to ensure a robust handling of the concern.

The majority of the information required from Fund Recipients ensures the FM understands the details of the incident. Even where Fund Recipients' feel they have answered questions previously in the initial report or other communications with the FM, it is important that this information is (re)entered here. This information provides the FM with details which are used to collate information from across the portfolio and allows for the FM to analyse information from across projects, identifying trends in regions, or times, or types of perpetrators – for example. We ask for details relating to the safety of the survivor, the Fund Recipient's understanding of the law and this case, referrals made and information regarding the Fund Recipient's knowledge of the alleged wrongdoer. This supports the FM in understanding whether the Fund Recipient has handled the concern appropriately, and in a survivor-centred way. It also helps the FM to understand if our categorisation of the concern has been accurate.

Fund Recipients are also asked about their timeline for their investigation. This information can then be used to set reminders for the FM to be able to review the SHE record for updates and follow up with the Fund Recipient regarding progress made.

**We would expect that Part 1 would be completed within 1 week of the initial report coming in to SHE (depending on the partners triage of the case, they can provide justification as to why there may be a delay in this to the FM for our consideration).**

### *Part 2 (Investigation and Closure Report):*

Part 2 of our reporting form provides an opportunity for the Fund Recipient to provide further information regarding the investigation process that has taken place, the conclusion of the investigation and the suggested next steps regarding closure. Here, the Fund Recipient must also discuss lessons learned from handling the case. Even where the concern was found to be without basis, the Fund Recipient is expected to learn from the process and to strengthen part of their safeguarding work as a result. For example, where there were delays in reporting the concern by the alleged survivor, the project should assess why this happened through a review of the trust and effectiveness of their reporting mechanisms. Another example may be that through the investigation, the Fund Recipient learned that staff and contractors were not aware of the code of conduct and as a result of this learning, they will increase the number of staff and contractor trainings. The lessons learned section of Part 2 should be answered in detail to avoid delays in case closure from the FM and FCDO, and to avoid actions being raised via SHE with regards to this.

We would expect that this section would be completed according to different timelines that are in place within Fund Recipient policies and according to project's own triaging of the concern (risk to person, project and reputation – for example). The FM expects that Fund Recipients should keep the FM updated regarding any investigation timelines so that reviews may be scheduled.

### *Identity questions regarding the survivor*

Across both part 1 and part 2 of our safeguarding form, there are a number of questions regarding the protected characteristics of the alleged survivor. Gender, age, disability status etc. are included. This information can be used to analyse information shared via SHE from across the portfolio and analyse which beneficiaries and staff/contractors/volunteers are most at risk. This allows for better support to projects in their prevention, mitigation, reporting and response work. It also allows the FM to analyse gaps in reporting. For example, where a project has a specific focus on working with girls with disabilities but haven't received concerns or incident reports from girls with disabilities, this would be an area for the FM to work with the project to explore.

If the alleged survivor is not forthcoming with information regarding any of these protected characteristics and the Fund Recipient doesn't already know this information (through interaction with the alleged survivor, for example) then they may ask them where safe to do so. **The Fund Recipient must not, however, cause confusion or discomfort in asking the question over a genuine lack of safety, and they are reminded that confidentiality and non-discrimination should be guiding principles for case handling.** Fund Recipients are also reminded about the following:

- Gender may not be immediately apparent and is a social construct. Gender may therefore be self-identified. For example, a person may appear to have features which meet social norms regarding masculinity, but may self-identify as a woman or as a non-binary individual.
- Disability may not be something that can be identified by looking or speaking with an individual. Many disabilities are hidden.
- Sexual orientation should be included within Fund Recipients' work on safeguarding. Many of the beneficiaries the GEC works with are going through adolescence – a key time in childhood development, where many question or come to understand their sexual orientation. There are a wide variety of sexual orientations and diverse sexual orientations exist in every society – whether these are legally or culturally accepted or not. In many contexts transgressing strict gender and sexual norms can result in individuals being targeted, whether they self-identify as LGBT or not. Staff members may experience safeguarding concerns based on this protected characteristic and they should also be protected by Fund Recipients policies and handling.
- All staff who work on safeguarding should be trained in how to work in a non-discriminatory way with survivors who have diverse needs – ensuring that they are able to access specific services, that their specific needs are taken into account in security and risk analysis work, and that individuals with diverse needs are able to access reporting mechanisms (and feel comfortable in reporting) in the first place by promoting a culture of inclusivity, diversity and non-discrimination.

## **5.2 Guidelines for Fund Recipient Safeguarding Due Diligence and Safeguarding Action Plans**

At the beginning of contracting with the GEC, Fund Recipients are required to submit a GEC Safeguarding Due Diligence Tool for themselves and their downstream partners. The safeguarding Due Diligence tool is separated out into 14 sections, in-line with the GEC's 14

Minimum Standards on Safeguarding (see, Annex 2). The Due Diligence template can be found [here](#). Projects should complete their Due Diligence process every 2 years.

The Due Diligence process requires Fund Recipients to identify gaps in their own safeguarding policies and procedures, as well as identify actions to fill those gaps. This is then submitted to the FM, along with all Lead Partner policies and procedures related to the GEC's 14 Minimum Standards on Safeguarding. The Safeguarding Team within the FM then review these materials and identify any additional gaps they find in order to ensure compliance with the minimum standards and to additionally ensure that the policy framework, procedures and protocols are safe, survivor-centred and are comprehensive. This review, whilst robust, is not a review of overall quality and ultimate responsibility for the implementation of policies, procedures and protocols remains with the Fund Recipient. The Fund Recipient (lead), is responsible for the standards being met and applied by downstream partners. Where partners do not meet foundational criteria for safeguarding (i.e., do not meet the Core Standards – see Annex 2 for further details), the project may be paused and/or not allowed to implement until certain actions and standards have been met. This is at the discretion of the Safeguarding Team and SMT.

The information from the Due Diligence and the FM's review is input into a Safeguarding Action Plan by the FM Safeguarding Team and shared and agreed with the Fund Recipient. The Safeguarding Action Plan prioritises actions in accordance with their urgency for the partner and provides dates for completion. The FM provides 1:1 support to projects where they need it and shares resources and learning through the Safeguarding Team's direct engagement with Fund Recipients.

The FM reserves the right to add actions to safeguarding action plans, where Fund Recipients are found to have additional gaps in their safeguarding work. Gaps can be found through the case management process, through conversations with the Fund Recipient, through monitoring of implementation, through quarterly or annual reports, or through the submission of the reviewed due diligence tool by Fund Recipients every two years.

Safeguarding is an ongoing journey and should be treated as a process which requires reflection and regular updating according to feedback from staff and beneficiaries, as well as reflections on the handling of safeguarding incidents and updates in technical guidance in the sector. We would therefore ask that Fund Recipients be cognisant that safeguarding action plans may be updated. Within the safeguarding action plans, there are also a number of actions which are marked as 'ongoing'. These are activities that the FM requires partners to deliver regularly. These will be checked intermittently by the FM Safeguarding Team and SPAs.

Finally, Safeguarding Action Plans will be used to contribute to creating 'conditions' which may be placed on projects should they wish to implement adaptations. Existing levels of compliance will be taken into account regarding the need for conditions (as well as whether the programmatic adaptation is new and therefore requires additional safeguarding procedures etc.) and then this adaptation will be added to the safeguarding action plan with an agreed timeline for submission.

### 5.3 Guidelines for Safeguarding Monitoring and Project Visits

The FM will conduct monitoring work with Fund Recipients from time to time. The FM mandates that all monitoring trips or assignments must include a component of work on safeguarding. Non-specialist tools can be found [here](#). The non-specialist tools consist of questions to ask staff members regarding policy and reporting, and a safety audit tool that the monitor can complete if they visit education facilities.

The FM and the safeguarding lead in the Alliance Partners (Social Development Direct), maintain a pool of suitable safeguarding consultants who are trained and trusted and can be used for safeguarding specific monitoring. The specialist tools can be found [here](#). The specialist tools consist of more detailed questions to ask Fund Recipient staff members about policies, reporting and other safeguarding knowledge, as well as the same safety audit tool as used with non-specialists. The specialist tools also include a guide on exploring the culture of safeguarding and working with girls themselves through focus groups.

The FM also has a tool used to support distance monitoring. The tool is adapted from our other monitoring tools and delivered by our consultants through phone calls.

### 5.4 Guidelines for Safeguarding and Evaluations

Fund Recipients should ensure that all external evaluators are trained to be able to deliver evaluation work safely. They must ensure that the external evaluators have their own, robust, safeguarding policies in place. They should ensure that external evaluators are trained in the project's own code of conduct, that they are aware of what to do should a disclosure be made during the process of external evaluation.

#### Questions to ask:

- Does the External Evaluator have a safeguarding policy that meets our minimum standard?
- Has the Fund Recipient conducted due diligence and addressed the way they can mitigate against risk?
- Are their training materials appropriate for the project and context?
- Do they go through practical recommendations, and do they train enumerators/facilitators in reporting and receiving safeguarding complaints/protection-related disclosures?

Basic care and support for survivors of protection-related disclosures (including safeguarding disclosures) should be available locally before commencing any activity that may involve individuals disclosing information about their experiences of violence. This includes health services to be able to provide life-saving support, as well as psychosocial support to be able to provide assistance to anyone who experiences distress.

External Evaluators (or anyone conducting research, monitoring or evaluation activities) **must** be able to appropriately receive a disclosure. They should be able to do this in a way that is reassuring. Examples are below:

- This is not your fault
- I am glad that you have told me
- I am sorry you are going through this
- You are very brave for telling me and I will try to help you

Once a disclosure is made, the external evaluator must be able to provide a referral. For both broader protection cases and for safeguarding cases, they must be able to provide information on the services which are available for the alleged survivor to attend.

The external evaluator must explain at the beginning of every interview or focus group, that confidentiality cannot be guaranteed if children disclose abuse. The external evaluator must report child abuse to the police (where the Fund Recipient's referral pathway notes that this is a safe referral to make) and must tell the designated safeguarding officer, focal point or equivalent within the Fund Recipient. Safeguarding concerns reported in this way to the Fund Recipient must still be reported within 24 hours to the FM via SHE.

Where there is a broad disclosure made - for example through a focus group discussion where several participants stated that safeguarding concerns were taking place in a nearby school or set of schools - this must be treated in the same way as a disclosure of a specific incident. Due to the shame and stigma often associated with reporting, this kind of disclosure must be treated as seriously as a report of a specific incident. This should also be reported, via SHE, within 24 hours. All potential survivors of the incident should be made aware of the reporting mechanisms and services available as soon as possible in such a way that does not identify the members of the focus group as having reported or as survivors themselves.

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This document has been prepared only for FCDO in accordance with the terms agreed with FCDO and for no other purpose. PricewaterhouseCoopers LLP and the other entities managing the Girls' Education Challenge (as listed above) accept no liability to anyone else in connection with this document.

# Annex 1: Reporting format

You may use this form to note your concerns about a breach of this safeguarding policy. This should be sent to either your line manager if you are a GEC staff or contractor or if you would prefer to make an anonymous complaint, please send the form to [uk\\_gec\\_pmo@pwc.com](mailto:uk_gec_pmo@pwc.com) You may also inform or report to the Safeguarding Lead ([nancy.abwola@girlseducationchallenge.org](mailto:nancy.abwola@girlseducationchallenge.org)). If the form has not been used by the person reporting, the GEC PMO may wish to complete before sharing it with SMT prior to the case discussion.

|  |
|--|
| <b>Part One: About You</b>   |
| Name (optional):<br>Your role in or relationship to GEC Alliance (for example staff, contractor, fund recipient):<br>Your relationship to the survivor:<br>How can we contact you if we need more information?:  |
| <b>Part Two: About the Survivor</b>  |
| Name(s) (if known):<br>(This information will only be shared on a need to know basis)<br>Male/female/non-binary:<br>Age:<br>Address if known. If address is not known, how can we find the survivor?:<br>In your opinion, would it be safe to contact the survivor?  |
| <b>Part Three: About Your Concern</b> (continue on a separate sheet if necessary)  |
| Date, time and place of any incident(s):<br>In your own words, describe the nature of concern/allegation:<br>Observations made by you (e.g. child's/ adult at risk's emotional state, any physical evidence):<br>How did you come to have a concern: was abuse observed or suspected? Was an allegation made? Did a child/adult at risk disclose abuse?<br>If the child/adult at risk reported the incident to you directly, please write down exactly what the child/adult at risk said and what you said:<br>Is there any other relevant information we should be aware of?<br><br>Have you reported the incident to anyone else? If yes, please specify:<br>- Time and date of reporting: |



- Person(s) to whom report was made:
- Information given by the person you reported to:
- Are you aware of any actions that have been taken to respond to this incident yet:

Do you have any recommendations for us as to actions to take (for example who to contact in country that can help the child/adult at risk)?

**Part Four: Other Information** (Optional)

Please add any other relevant information below about yourself or the concern you are raising that has not been covered in the previous questions.

## Annex 2: Safeguarding guidance for projects

It is vital that the FM keep safeguarding of those at risk from violence, exploitation and abuse at the core of the FM's activities across all workstreams. Therefore, all organisations receiving GEC funding, including both lead and downstream Fund Recipients, are required to comply with the GEC standards related to safeguarding. In line with FCDO's safeguarding commitment, the FM has developed 14 minimum standards that all organisations need to adhere to.

All GEC fund recipients will need to complete a self-assessment and provide supporting evidence to show adherence to these standards and submit to the FM for consideration prior to contracting and every two years thereafter.

### ***The 14 minimum standards on safeguarding for all GEC funded organisations***

#### **GEC safeguarding standards**

*These apply to all organisations receiving GEC funding (lead, downstream or other Fund Recipients or contractors).*

- |                        |  |
|------------------------|--|
| <b>Safeguarding</b>    | <ol style="list-style-type: none"><li>1. All organisations receiving GEC funding must have either an overarching/combined safeguarding <u>policy</u> or a combination of relevant policies which address bullying, sexual harassment and abuse targeted at both beneficiaries, including adults at risk, Fund Recipient staff and staff within an organisation.</li><li>2. All organisations must have a separate child safeguarding policy which address all forms of sexual, physical and emotional violence towards children.</li><li>3. All organisations must have comprehensive systems for <u>escalating and managing concerns and complaints</u>. These must include the option of whistleblowing and for this to be available to both beneficiaries, including children and their caregivers, and staff without reprisal.</li></ol> |
| <b>Whistleblowing</b>  | <ol style="list-style-type: none"><li>4. A clear <u>handling framework</u>, to respond appropriately to all concerns and support the survivor of violence must also be in place.</li></ol>   |
| <b>Human resources</b> | <ol style="list-style-type: none"><li>5. All organisations must have a <u>human resources system</u> which includes effective management of recruitment, vetting and performance management. Vetting must include adequate screening and assessment of individuals that will have direct contact with children.</li><li>6. All staff, contractors, volunteers and other representatives of the organisation have at least a mandatory induction when they start and annual refresher <u>training</u> on the organisation's safeguarding policy (or bundle of policies), child safeguarding policy and whistleblowing.</li></ol>  |
| <b>Risk management</b> | <ol style="list-style-type: none"><li>7. Each organisation must have a comprehensive and effective <u>risk management</u> framework in place which includes reference to both safeguarding and a detailed risk register for the project. The risk register must include reference to safeguarding risks, including those for children.</li><li>8. Each organisation must have procedures in place to make sure that safeguarding processes and standards are also</li></ol>  |

- upheld for any Fund Recipient, contractor or supplier they work with.
- Code of conduct**
9. Each organisation needs to have a code of conduct which is applicable both inside and outside of working hours. This needs to set out the ethics and behaviour expected of all parties.
  10. Specific behaviour protocols must be in place outlining appropriate and inappropriate behaviour of adults towards children (and children to children).
- Governance and accountability**
11. Effective governance and accountability standards must be in place within all organisations with the Board holding ultimate responsibility for safeguarding.
  12. Designated Safeguarding Officers must be found at different levels including at least at senior level in the country office and at the Board.
  13. There are clear guidelines for monitoring and overseeing implementation of the policy (policies).
  14. All safeguarding incidents and allegations must be reported to the GEC Fund Manager within 24 hours.

### ***Child protection and gender-based violence (GBV) programming and capacity***

In addition to thinking about organisational risks, GEC projects also need to think about women's, men's, boys' and girls' experience of violence more generally. Violence against children and gender-based violence are grave violations of human rights and the scope of this problem is significant. Know Violence in Childhood (2017) has estimated that in 2015 at least three out of every four of the world's children had experienced some form of violence in a previous year, highlighting the sheer scale of the problem of violence against children. According to the World Health Organisation, 1 in 3 women and girls will experience physical or sexual violence in their lifetime.

By placing child protection and GBV mitigation, prevention and response at their core, education projects can both fulfil girls' rights to be free from violence *and* make sure that students have a positive experience of school in order to support their learning. Safe learning environments, free from violence, are known to support students' progression and their learning outcomes. The GEC therefore expects that projects will be able to demonstrate that they have strong child protection and GBV awareness and capacity in place to ensure the projects' initial designs respond to the needs of children and shows commitment to DNH principles and compliance with the GEC DNH policy.

While projects do not necessarily need to include explicit violence prevention and response interventions, all projects must have adequate child protection and GBV capacity in place from the outset and they must have thought about how and if school violence feature in the logic chain. This is particularly important when projects work with children or adults who are more likely to be at risk of violence, abuse or exploitation – adults at risk, or adults and children who experience oppression based on identity, social or geographical determinants. Where projects find that violence is a significant concern to any women, men, boys and girls the FM strongly encourages projects to include activities to prevent and respond to this.

### ***Protection of young women (18+ years)***

The FM recognises that in some instances GEC fund recipients may work with girls who are older than 18 and would be classed as young women rather than children, therefore not covered by either international or national child rights legislation. However, these young women face many similar challenges to adolescent girls, including being at increased risk to

the perpetration of different forms of GBV against them, including but not limited to sexual abuse, intimate partner violence, transactional sex, forced marriage and others. In these circumstances projects are expected to be aware of the risks that these young women may face, ensure that their interventions or support do not put them at undue risk, and that identified risks are mitigated to the extent possible.

## Annex 3: Code of Conduct

This Code of Conduct provides expected standards of behaviour of GEC Alliance staff and contractors towards children, adults at risk and other individuals such as colleagues and beneficiaries.

The below is not an exhaustive list and should be interpreted in a spirit of common sense.

The Code applies to conduct in both staff's professional role and in their personal lives. GEC Alliance staff and contractors always represent the FM and as such you will never be entirely 'off duty' and so standards of behaviour apply both inside and outside of working hours. Standards of behaviour apply 24 hours a day. If a breach of the code of conduct, or the principles within this or any other associated FM Safeguarding Policy is reported to the FM, it will be handled in the same way whether the alleged incident occurred inside or outside of working hours.

### **Staff must always:**

- Uphold the rights and welfare of colleagues, Fund Recipient staff members and associated personnel, beneficiaries, secondary beneficiaries and members of the communities we work with through the GEC.
- Read thoroughly, promote and raise awareness of all GEC Safeguarding Policies.
- Ensure they are aware of their Safeguarding Focal Point within their Alliance Partner contractor, aware of specific Alliance Partner policies and procedures and aware of GEC reporting mechanisms within the Fund Manager.
- Report any suspicions, concerns, or behaviours that breach any GEC Safeguarding Policy to the appropriate person(s). This includes (but is not limited to) any suspicions or incidents of sexual abuse and exploitation carried out by staff or contractors, or Fund Recipient staff, contractors, volunteers or associated personnel.
- Ensure they have received the relevant safeguarding training on joining.
- Maintain confidentiality regarding concerns and report concerns on a need to know basis only. This protects the dignity and identity of the alleged survivor and the alleged wrongdoer.

### **Line Managers must always:**

- Create a safe environment where staff and others feel able to raise concerns without fear of retribution.
- Ensure that if a member of their team has reported a breach of safeguarding policy, that this is raised with the PMO and Safeguarding Lead within 24 hours.
- Ensure all staff members and contractors that they manage are trained in Safeguarding Policy and procedures within 2 weeks of starting employment with the FM with the PMO.
- Ensure that you are aware of referral services for health, legal and psychosocial support to provide to anyone disclosing.
- Set a positive example both on and off duty.

### **When working with children or adults at risk you must always:**

- Conduct interactions with children that are safe, appropriate, child-friendly and sensitive to the feelings of the child.

- Be familiar with the procedures for reporting concerns or incidents at the GEC Alliance and the recipient organisation with which you are working.
- Immediately report any concerns relating to the safety or welfare of a child, adult at risk or personnel you are in contact with to your line manager or directly to the PMO email address and by emailing the FM Safeguarding Lead.
- Do not work alone with children and plan your work so that at least two adults are present at any time.
- Behave appropriately; make sure that language is moderated in their presence and refrain from adult jokes or comments that may cause discomfort or offence.
- Avoid inappropriate physical contact with a child or adult at risk. Using common sense, this does not limit physical contact with a child or adult at risk if they are hurt or distressed. In this circumstance, a child or adult at risk may be comforted or reassured without compromising his/her dignity.
- Be sensitive to local norms and standards of behaviour towards children and adults at risk. Where local norms and standards of behaviour contravene this code of conduct – or any of the FM's Safeguarding policies or guidance documents – the FM's policies and standards take precedence.
- Listen to what children and adults at risk are saying, and respond appropriately.

**When working with children or adults at risk you must:**

- Never act in a way that may be abusive or may place them at risk of abuse.
- Not condone, nor participate in, behaviour against a child or adult at risk that is illegal, unsafe, abusive. Again, the FM's Safeguarding Policy Framework and Code of Conduct take precedence over laws which may contravene our policies.
- Never hit or otherwise physically assault, harm or abuse them.
- Not develop physical/sexual relationships with them.
- Never verbally or physically act in a manner that is inappropriate or sexually provocative.
- Not develop relationships with them that could in any way be deemed exploitative or abusive.
- Not use language, make suggestions or offer advice that is inappropriate, offensive or abusive.
- Never act in ways intended to shame, humiliate, belittle or degrade children or adults at risk, or otherwise perpetrate any form of emotional abuse, discriminate against, show differential treatment, or favour particular children to the exclusion of others.
- Never allow allegations made by a child/adult at risk or concerns expressed by others about their welfare, to go unrecorded or not acted upon.
- Not do things for a child or adult at risk of a personal nature that they can do for themselves.
- Not have a child or adult at risk who are beneficiaries of the GEC, stay overnight at your home or other personal accommodation in which you are staying.
- Never use any computer or other electronic device to view, download, distribute or create indecent or inappropriate images of children or adults at risk.
- Never engage in any commercially exploitative activities with children including child labour or trafficking.

For further information, see the GEC Safeguarding Children and Adults at Risk Policy.

**The GEC Protection from Sexual Exploitation, Abuse and Harassment Policy highlights that staff of the FM and associated contractors must not:**

- Engage in any sexual activity with children (persons under the age of 18). This is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.
- Engage in any sexual activity with an adult at risk who is unable to provide informed consent.<sup>5</sup>
- Exchange money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This includes exchange of any assistance that is due to children or adults with whom we work.
- Engage in any other form of sexual exploitation or abuse.
- Engage in sexual harassment of any form, including but not limited to actions such as sexually-suggestive gestures, comments on a worker's appearance, age or private life, sexual comments, stories and jokes, unwanted sexual advances or revealing or discussing a person's sexual orientation or gender-identity without their express permission.
- Commit any act of gender based violence towards a beneficiary or secondary beneficiary of the GEC.

For further information, see the GEC Protection from Sexual Exploitation, Abuse and Harassment Policy.

**The GEC Protection from Sexual Exploitation, Abuse and Harassment at Work Policy highlights that staff of the FM and associated contractors must not:**

- Engage in any sexual activity with beneficiaries or secondary beneficiaries of the GEC or with members of staff from Fund Recipients or potential Fund Recipients. Existing relationships must be declared prior to working with the FM to the Fund Lead.
- Engage in any other form of sexual exploitation or abuse against work colleagues, Fund Recipients or prospective Fund Recipients.
- Engage in any form of sexual relationship with a person that they line manage or supervise.
- Engage in any form of sexual relationship with a more junior member of staff.
- Keep romantic and/or sexual relationships secret from the FM. Relationships must be declared as soon as possible to their line managers and the Fund Lead, even if the relationship is at an early stage and may not continue.
- Engage in sexual harassment of any form, including but not limited to actions such as sexually suggestive gestures, comments on a worker's appearance, age or private life, sexual comments, stories and jokes, unwanted sexual advances or revealing or discussing a person's sexual orientation or gender-identity without their express permission against work colleagues, Fund Recipients or prospective Fund Recipients.
- Commit any act of gender-based violence against work colleagues, Fund Recipients or prospective Fund Recipients.

For further information, see the GEC Protection from Sexual Exploitation, Abuse and Harassment at Work Policy.

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<sup>5</sup> Informed consent: permission granted in full knowledge of the possible consequences.

**The GEC GEC's Bullying and Harassment Statement, within the GEC's Safeguarding Overarching Policy highlights that staff of the FM and associated contractors must not:**

- Use offensive, derogatory language or intimidating actions or behaviours.
- Insult or use threatening gestures, language (overt or implied) or continual and unwarranted.
- Be physically or emotionally abusive in any way.
- Shout at any staff members, contractors or Fund Recipients.
- Use unjustified and/or unnecessary comments about a person's work or capacity for work.
- Openly display pictures, posters, graffiti, written materials, emails or digital media which might be offensive to some.
- Place phone calls or send messages on voicemails or electronic mail or computer networks which are demeaning, threatening, abusive, humiliating, or offensive to staff.
- Persistently follow or stalk within the workplace, or to and from work.
- Exclude a person, or group, from normal conversations, work assignments, workplace updates, information, resources, meetings, work related social activities and networks in the workplace.
- Assign impossible tasks or dead-lines, meaningless tasks unrelated to their job, or give an individual the majority of unpleasant tasks.
- Undermine an individual's responsibility.
- Withhold information which is essential to completing a task properly.
- Copy (cc) emails that are critical about someone to others, who do not need to know.
- Use blind copy (bcc) on emails inappropriately.
- Make threats or comments about job security without foundation.
- Change workplace arrangements to inconvenience a particular employee.
- Excessively scrutinise a person's work.
- Spread malicious rumour.
- Cyber bully.





**Should you wish to withdraw consent at any time during the 2-year validity period of this form, you may do so by contacting Clare Convey on the above email address.**

# Annex 5: Declaration

## Declaration

I \_\_\_\_\_ fully understand and agree to abide by the attached Code of Conduct and the GEC's Safeguarding Policies (Child and Adult at Risk Safeguarding Policy, PSEAH and PSEAH@W policies), including all annexes. I understand that any breaches of the Code of Conduct and policy will be reported to the GEC Senior Management, my Alliance Partner contractor and appropriate action will be taken in accordance with the relevant policies and procedures.

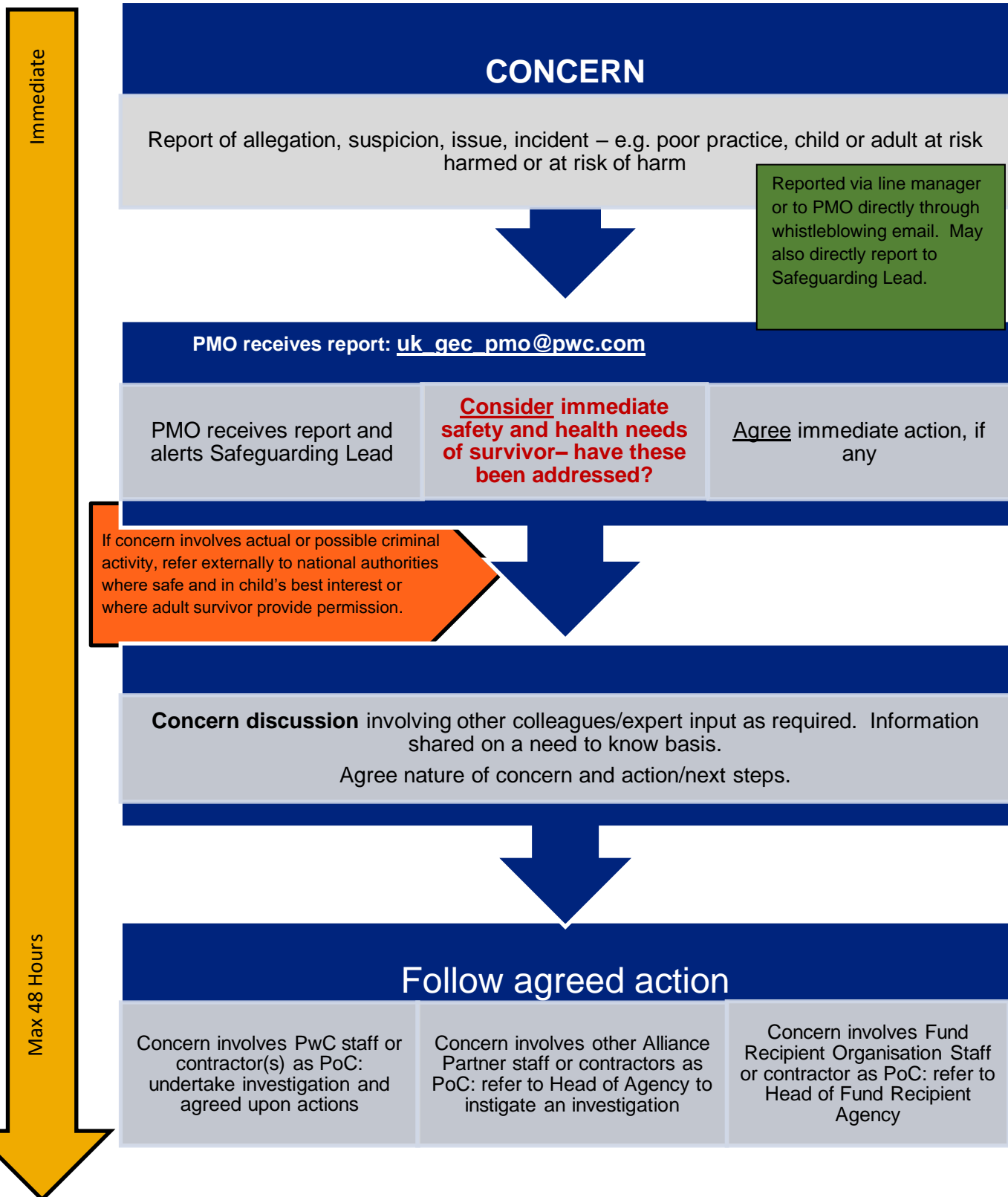
- I have read all named policies and all the annexes.
- I agree to notify the GEC FM immediately if there is any existing reason or an allegation/situation arises (within or outside my GEC work) that may or may be perceived to bring into question my suitability to work with children or adults at risk.
- I confirm that I have completed the relevant background checks as per Section 4.1 of the Safeguarding Overarching Policy.
- Where obtaining the required background check is in process/not yet completed. I confirm I do not have a criminal record meaning any convictions, cautions, reprimands or final warnings. I also confirm I have not been the subject of disciplinary proceedings relating to inappropriate conduct within an employed or voluntary capacity in or outside of the UK.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

# Annex 6: Reporting process flow diagram

This diagram explains the process to be taken when the FM becomes aware of a concern relating to a breach of this policy by a member of FM staff or contractor.



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