
Girls' Education Challenge

Updated GEC safeguarding RAAG and risk rating guidance - 2020

Introduction

This guidance is intended to support the Safeguarding Team, Safeguarding Champions and Portfolio Managers within the GEC in understanding the safeguarding capacity of projects (through RAAG ratings). It also highlights the risk involved in projects' work – both the project risk (level of exposure) and the exogenous risk. We then compare the risk level of the project and the safeguarding capacity of projects to generate an overall risk score. The RAAG and Risk calculations are used to inform and advise Portfolio Managers in their overall quarterly RAAG and Risk scoring for projects. RAAG and Risk is also used by the Safeguarding Team to identify projects who may need additional support.

The Safeguarding RAAG and Risk rating system for the GEC is based on the following:

RAAG

- 1) The level of compliance to GEC safeguarding minimum standards based on their safeguarding action plan score;
- 2) Whether the reporting rate of (cat 2 and 3) safeguarding cases is proportionate to the level of exposure risk associated with the project.

Risk

- 1) Project Risk (Compliance + Reports + Exposure)
- 2) Exogenous risk

This rating system allows the FM to gain a better understanding of GEC projects' status in terms of compliance to safeguarding minimum standards, whether reporting mechanisms are functional, and the context in which the project operates. However, this risk rating system does not allow us to predict if safeguarding incidents will take place, or to understand fully the quality of safeguarding implementation.

RAAG

To calculate RAAG for safeguarding we need to understand compliance and case handling. A project may have high compliance, but may not have received any cases over the lifetime of the project. The two scores should create an 'average' and be used to provide an overall RAAG rating.

1. Safeguarding RAAG – Compliance level of lead organisation

The Safeguarding RAAG refers to the level of compliance of GEC project lead organisations with the GEC safeguarding minimum standards.

**Severe
Risk (1)**

The project has achieved less than 50% in their SGAP over-all.

Major Risk (2)	Project is currently 50-75% overall on their SGAP. And/or Project is currently -75% on 1 or more core conditions (apart from Std 1)
Moderate Risk (3)	Project is currently 76% - 90% overall on their SGAP (<i>unless project is currently -75% on 1 or more core conditions apart from standard 1 in which case they will be marked as Major Risk</i>)
Low Risk (4)	Projects at 90% or over on all standards (overall rating of their SGAP) should be marked at this level (<i>unless project is currently -75% on 1 or more core conditions apart from standard 1 in which case they will be marked as Major Risk</i>)

Safeguarding core conditions refer to specific compliance of the project lead organisation with five of the 14 GEC safeguarding minimum standards in line with DFID Smart guidance for enhanced due diligence on safeguarding (Annex A), namely:

- Standard 1: Safeguarding policies are in place which address bullying, sexual exploitation, abuse and harassment abuse (SEAH) targeted at both beneficiaries, including adults at risk, partner staff and staff within an organisation. (non-sexual) harassment, bullying
- Standard 2: A child safeguarding policy is in place which address all forms of sexual, physical and emotional violence towards children
- Standard 4: A clear handling framework, to respond appropriately to all concerns and support the survivor of violence must also be in place
- Standard 6: All staff, contractors, volunteers and other representatives of the organisation have at least a mandatory induction when they start and annual refresher training on the organisation's safeguarding policy (or bundle of policies)
- Standard 12: A designated safeguarding officer is in place at board and country-level

2. Number of cases

Safeguarding Team is to analyse the number of safeguarding cases reported by the project in the previous quarter (and during the lifetime of the project) and assess if this is proportionate to the exposure risk of the project and the way in which the case or issue was handled.

New safeguarding case categories relating to projects

2	Cases involving fund recipients (lead partners, consortium partners, implementing partners, contractors) staff, contractors or volunteers as PoC
3	Cases involving school staff, or other staff, volunteers or associated personnel, who have (or are likely to have) received GEC support in kind - for example, bursaries, loans, materials. Or at a school that the project has a 'partnership' with and encourages children to attend.

	<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>
4	<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.</p>
5	<p>Health and safety concern raised concerning infrastructure or physical danger.</p>
6	<p>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.</p>
7	<p>General GBV and Child Abuse cases where victims/survivors are girls taking part in our projects (serious incidents reported – all survivors/victims should be appropriately referred to services).</p>

Risk

1. Project safeguarding exposure risk

In the context of the GEC, **project safeguarding exposure risk** refers to the level of contact of each project organisation workforce with children and communities in the area of intervention. **The safeguarding exposure risk rating is based on the highest exposure risk rating identified amongst project partners.** It is noted that as part of the recent due diligence assessment, an increased number of organisations self-assessed themselves as having direct contact with children on a daily and occasional basis compared to past due diligence assessments. A need to further breakdown the level of contact with children and communities with information on the nature of this contact was needed to better capture nuances of a portfolio such as the GEC. In addition, the evidenced barriers to cascading safeguarding policies and their implementation at country-level for lead organisations with little or no in-country presence are factored in when considering project safeguarding exposure risk.

Serious	<p>Project partners have contact with children and communities that involves:</p> <ul style="list-style-type: none"> - Direct provision of temporary accommodation for beneficiaries - Direct provision of teaching services through primary education-giver (day-to-day teachers) - Project distribute cash, bursaries or other resources - Household visits for distribution or other project activities - Direct¹ provision of mentoring or tutoring (homework clubs, literacy clubs, girls' club, safe spaces) <p>If the project works with marginalised girls (girls with disabilities, girls who are married etc) then this would also elevate it into the serious risk category.</p> <p>This is an issue / risk that could severely affect the achievement of one or many of the project objectives.</p>
Major	<p>Project partners have contact with children and communities that involves:</p> <ul style="list-style-type: none"> - Project partners have occasional contact² with children and communities. <p>This is an issue / risk that could severely affect the achievement of one or many of the project objectives.</p>
Moderate	<p>Project partners have contact with children and communities that involves:</p> <ul style="list-style-type: none"> - Project partners have very little contact with children and communities. This is an issue / risk that could have a minor effect on the achievement of one or many of the project objectives³ <p>This is an issue / risk that could have a moderate effect on the achievement of one or many of the project objectives</p>
Minor	<p>Project partners have contact with children and communities that involves:</p> <ul style="list-style-type: none"> - Project partners only work with community members who are in a position of power. Project partners have no contact with children.

2. Calculating Project Risk

Compliance	Score	Number of cases	Score	Exposure Risk	Score
Not compliant	1	None/Few (over a long period of time)	1	Serious	1

¹ The term "direct" here is used to describe an activity being directly and fully implemented by the project's workforce (volunteer, consultants, staff members etc..)

² For instance, a teacher's mentor visiting the school every week or every month

³ Monitoring visits done quarterly for instance

In progress on Core Conditions	2	Low	2	Major	2
Compliant with Core Conditions	3	Medium	3	Moderate	3
Compliant with 14 Minimum Standards	4	High	4	Minor	4

Total Risk	Score
Serious	-3-4
Major	5-7
Moderate	7-10
Minor	11-12+

Example

Project 1

Overall RAAG: Amber Red

Breakdown of RAAG

- Compliance RAAG: Amber Red
- Case/Reporting RAAG: Amber

Notes for PM: Reports have started to come in during this quarter, representing a positive shift in strength of reporting mechanisms. All where cat 3, but this is related to their exposure risk. Positive trajectory throughout to be noted.

Risk:

Compliance, Amber Red (2) + Reports/Case Management, Low (2) + Major Exposure Risk (2) = **6 Major safeguarding project risk**

Project 2

Overall RAAG: Red

Breakdown of RAAG

- Compliance, Amber Red
- Cases/Reporting: No reports over lifetime of project. Red

Risk:

Compliance, Amber Red (2) + Reports/Case Management, Low (1) + Major Exposure Risk (1) = **4 Serious safeguarding project risk**

You can also provide a note to the project/PM.

Quarterly Reports (and other reports)

Within the RAAG and Risk updates, Safeguarding Champions and PMs should review recent reports and highlight any issues, concerns or risks. These should be logged on the Safeguarding Champion's issue log and brought to the attention of the Safeguarding Lead (LNGB) and Safeguarding Manager (GEC-T). These issues may impact upon the RAAG and Risk. For example, if a project has a Green RAAG and Moderate Risk and it is found through their quarterly report that they have not reported a case or issue appropriately through SHE, or that their activities are (or are likely to) causing harm – then the Safeguarding Champion may adjust the RAAG and Risk scores appropriately. They may adjust accordingly based on findings through monitoring visits as well.

3. Exogenous Risk and Safeguarding

Serious	<p>Project operates in:</p> <ul style="list-style-type: none">- An area currently going through a humanitarian crisis, this can include but is not limited to: famine or high-levels of food insecurity; displacement of populations into or out of the areas due to conflict or other humanitarian crisis; drought; health crisis (disease or virus); earth-quake or other natural disaster. <p>And/or one or more of the following is true:</p> <ul style="list-style-type: none">- The project's country of operation is listed as having 'very high' levels of discrimination on the SIGI Index (or is listed as 'N/A')- The project's country of operation is listed in the 'Girls Not Brides' list of top ten countries where child marriage happens, or where the context they are operating in has particular high levels of child
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	<p>marriage (which may be disproportionately high in comparison to national levels)</p> <ul style="list-style-type: none"> - The project's country of operation is listed in The Global Initiative to End All Corporal Punishment of Children as 'Not Fully Prohibited in any Setting'. <p>It may also present a serious risk if the project notes that there has been a closure of referral services.</p> <p>This is an issue which could exacerbate safeguarding concerns – including creating further opportunity for SEA to take place. It may also impact the projects ability to respond to safeguarding cases or referral services ability to respond appropriately.</p>
Major	<p>Project operates in:</p> <ul style="list-style-type: none"> - A post-conflict/post-crisis context where the Cluster/UN sectoral system no longer operates. <p>And/or one or more of the following is true:</p> <ul style="list-style-type: none"> - The project's country of operation is listed as having 'high' levels of discrimination on the SIGI Index - The project's country of operation is listed in the 'Girls Not Brides' list of countries where child marriage happens (between 11 - 20) - The project's country of operation is listed in The Global Initiative to End All Corporal Punishment of Children as 'Prohibited in some settings'
Moderate	<p>One or more of the following is true:</p> <ul style="list-style-type: none"> - The project's country of operation is listed as having 'medium' levels of discrimination on the SIGI Index - The project's country of operation is listed in The Global Initiative to End All Corporal Punishment of Children as 'Gov. committed to prohibition'
Minor	<p>One or more of the following is true:</p> <ul style="list-style-type: none"> - The project's country of operation is listed as having 'low' or 'very low' levels of discrimination on the SIGI Index - The project's country of operation is listed in The Global Initiative to End All Corporal Punishment of Children as 'Prohibited in all settings'.

Quarterly Reports (and other reports)

Within reports, projects may note external risk factors. Exogenous risk may change over time.