Girls' Education Challenge

Safeguarding

Monitoring Policy and Compliance

[Internal Document]

Key aspects to consider before monitoring visit[1]:

Contact the Portfolio Manager and the Safeguarding Lead *[email address]* to inform them about your trip and ask for the following information to be shared:

- **What is the safeguarding risk level of this project**? This should inform how much time you dedicate to testing the safeguarding systems in place. If a project includes frequent or unsupervised contact between project hired staff (or consultants, volunteers etc.) and beneficiaries you should dedicate more time to testing their safeguarding policy implementation.
- Remember that **all partners are expected to adhere to the GEC's minimum standards on safeguarding** (see table below). They all need to have Safeguarding policies that are implemented. The Portfolio Manager and the Safeguarding Lead can let you know if they are struggling in any specific areas of safeguarding and advise if there is anything you can monitor as a non-specialist.

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 partners or contractors).	
Safeguarding	1. All organisations receiving GEC funding must have either an overarching/combined safeguarding policy or a combination of relevant policies which address bullying, sexual harassment and abuse targeted at both beneficiaries, including adults at risk, partner staff and staff within an organisation. 2. All organisations must have a separate child safeguarding policy which address all forms of sexual, physical and emotional violence towards children.
Whistleblowing	3. All organisations must have comprehensive systems for escalating and managing concerns and complaints. 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.

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[1] 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 [email address] or telephone [telephone number]

If you have a child safeguarding concern involving a GEC fund recipient please contact the GEC's Safeguarding Lead, *[full name] [email address]*

	4. A clear <u>handling framework</u>, to respond appropriately to all concerns and support the survivor of violence must also be in place.
Human resources	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. 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.
Risk management	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 registers for the LNGB project. The LNGB risk register must include reference to safeguarding risks, including those for children. 8. Each organisation must have procedures in place to make sure that safeguarding processes and standards are also upheld for any <u>partner, contractor or supplier</u> they work with.
Code of conduct	9. Each organisation needs to have a <u>code of conduct</u> 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 <u>children</u> (and children to children).
Governance and accountability	11. Effective <u>governance and accountability</u> standards must be in place within all organisations with the Board holding ultimate responsibility for safeguarding. 12. <u>Designated safeguarding Officers</u> 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 <u>reported to the GEC Fund Manager</u> within 24 hours.

Monitoring Safeguarding Implementation of Policies

Monitoring aspects	How?	What to look out for	Why do we want to know this?
Can be covered by non-specialists (finance monitors, monitors working on other thematic areas etc.)			
Accessibility of Safeguarding policy A copy of the Safeguarding policy should be easily accessible and visible in all project offices.	When you enter a project office (consortium lead or implementing partner), whether country office or field office, check to see if you can easily see a copy of the Safeguarding policy. Please note: 1. Where is the (simplified/translated/child friendly) Safeguarding policy placed? Can people easily see how to report a concern? 2. In clubs/schools/facilities run by projects where children/beneficiaries will frequently be present is there a child friendly copy of the safeguarding policy available? Is this also accessible for children with different impairments? 3. Does project staff remind you of what your safeguarding responsibilities are (you are a visitor to their project and they should never assume that you have been adequately vetted	If you can't see a simplified version of the safeguarding policy, ask a member of staff where it is displayed. If it's not visible ask why not.	The reason a simplified version of the safeguarding policy should be displayed is so everyone is clear on the commitment to keep children/beneficiaries/staff members/the community safe and understand how to raise a complaint. How can women, men, boys and girls be expected to use the complaint mechanism if they don't know it exists? A simplified safeguarding policy therefore needs to exist and be displayed in every national/district/school. Remember that projects also should not set up parallel systems so if a project works in a school that has its own safeguarding policy they wouldn't want to give children two conflicting reporting processes to display next to each other (i.e., the schools policy and the project's policy). In this case they may for example be better off: a) providing a copy of the project's policy to the school leadership b) providing a copy to the community where children live c) tell children about the policy but encourage them to use the

	by the FM or that you don't need to follow the code of conduct). You should also be told how you can report concerns/issues/incidents. 4. Ask what the entry points are to reporting cases in your induction for you and for the community (there should be more than 1) 5. Are there different promotional materials (posters, leaflets etc) which discuss behavioural expectations of staff members? 6. Are there different promotional materials (posters, leaflets etc) which discuss sexual exploitation and abuse? 7. Are there different promotional materials (posters, leaflets etc) which clearly outline how to report safeguarding concerns/issues/incidents?		normal school procedures if they have a concern.

Monitor's Feedback			
Staff knowledge of Safeguarding policy Different people involved in the project should have basic knowledge of the safeguarding policy, including knowing how to report a breach.	*Ask* the following questions to test basic knowledge: 1. Who would you report to if you had a safeguarding concern? Note if people you speak to outline the same (correct) process. 2. What is included in the code of conduct? 3. When was the last time you had safeguarding training? 4. What would you do if you became aware of a child abuse case a) in the community generally and b) perpetrated by a colleague or other staff/volunteers/etc. engaged in the project? 5. Who is the focal point for safeguarding at national/district level?	Ask different members of staff the same questions in different settings (you should get the same answer). Don't forget to include more junior staff such as drivers or project assistants and senior staff such as PMs or country director. Remember to ask both in field offices and country offices and both for the lead and the implementing partners. Remember that the GEC operates a zero tolerance for any type of physical, emotional or sexual violence.	A safeguarding policy needs to be adhered to by everyone and everyone needs to know how it relates to them. At a minimum everyone should know: 1. What is child abuse 2. What is sexual exploitation and abuse 3. What they can and cannot do (for example can they take photos of children when on field trips, can they be alone with a child, is corporal punishment acceptable) 4. How and when to report a concern and what to report 5. What the consequences are of breaching the safeguarding policy

Monitor's Feedback			
Specialist only			
Detailed safeguarding procedures Key people should have more advanced knowledge of the Safeguarding policy and its implementation.	Ask the following questions to test advanced knowledge: 1. Are there any processes for assessing safety when you conduct activities with children, adolescent girls and the community and what do these look like? What gender or other social inclusion specific risks do you note in your activities? 2. How are safeguarding concerns tracked and logged? How is the confidentiality of this information maintained? 3. What training has the focal point received and what skills do they have – do they feel supported and skilled to carry out their duties?) 4. When was the last training session for all staff (country	Key considerations to bear in mind: 1. Think for example about if a project is allowing girls to travel to another town/city/region or attend a meeting. Are there procedures to keep them safe? Who monitors that these are in place? 2. Who keeps the records? Who has an overview of all safeguarding policy implementation and gaps? 3. Do focal points receive more training and support to make sure they are able to	Some staff/teams have more responsibility for safeguarding than others and they need to have more knowledge of its implementation, for example: 1. HR (safe recruitment, disciplinary processes) 2. Safeguarding Focal Point 3. Head of Office/Country Director 4. Communications team 5. Procurement team 6. Evaluation team

	office and field office)? Do you have records of who attended? 5. Are records kept with regards to safeguarding policy implementation (for example about staff's training needs and staff's signature on policies)? 6. How are safeguards implemented for communications activities (consent for photographs/videos/social media)? Are records available? How are risks associated with using photos determined? 7. What safeguards are in place in relation to data protection? 8. How are safeguards implemented in practice during the procurement process? (for example, if the organisation is paying for a construction company to do some work in a school or how do they know a supplier is not using child labour or that workers are monitored?) 9. How is the policy implemented in relation to monitoring and evaluation activities? For example how do they know that any sub-contracted staff/contractor/volunteer behaves according to the project's code of conduct? How	effectively lead safeguarding policy implementation in their country/region/district? 4. Training for all staff should usually be annually 5. While you should not ask for confidential information, do note if the project you monitor is trying to share this with you anyway. If they do please do not look at it and highlight this as a gap that they need to address.	

	do they know that no individuals with criminal records end up working directly with a child (for example through conducting an interview)? 10. How do they know that no staff member is married to a child (under the age of 18)?		
Monitor's Feedback			
Reporting and Handling	Try to speak teaching staff and DSOs and ask: 1. What is the trusted referral pathway for different types of safeguarding cases? 2. If a survivor/victim of a safeguarding incident reports to a health/legal/psychosocial service, how will you learn out this? Are there information sharing protocols in place? 3. Test their understanding of a survivor-centred approach to safeguarding:	• Are teachers and staff aware of a survivor/victim-centred approach? • Would they provide information to an adult regarding referrals (along with strengths and risks of referral service) and would they work to ensure best-interest of child survivors? How?	It is vital that this component is clear amongst those who may receive reports.

	• If a girl reports that she has been raped by a teacher, what would you do? • If a female member of staff reports that she has experienced sexual harassment, what would you do? • If a member of staff if married to a child, what would you do?	• In cases of sexual violence, would they prioritise health services? • Red flags: (a) investigate before reporting and referral; (b) prioritise internal process over survivor/victims access to services through referrals; (c) would refer to the police without asking for consent from survivors and do not consider safety/repercussions of referrals.	
Monitor's Feedback			
Coordination across consortium members/projects	Ask programme managers across both lead and implementing partners:		All safeguarding policy implementation breaches need to be reported to the FM. Lead partners therefore need to have procedures in place to make sure they get

	1. What safeguarding information is shared across the project? I.e. what do IPs need to share with the lead partner and how is this done? 2. How does the lead partner know that all partners are implementing their safeguarding policies appropriately across field offices and project sites? Do they conduct spot checks?		this information in a timely manner from each implementing/consortium partner. The lead partner also needs to have a system in place to make sure that all the implementing partners are adhering to the GEC's safeguarding minimum standards.
Monitor's Feedback			