
Working with children, keeping them safe

Girls' Education Challenge's Safeguarding Policy - Children and Vulnerable Adults

January 2018

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: gecpmo@uk.pwc.com or telephone: +44 (0) 20 7212 1100

If you have a child safeguarding concern involving a GEC fund recipient please contact the GEC's Child Protection Lead on ann@sddirect.org.uk

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Definitions

Types of abuse¹

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.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the maltreatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; provide adequate supervision (including the use of inadequate care-givers); or provide access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Other definitions

Alliance partner: any of the four organisations that form the key partners of the Fund Manager, PricewaterhouseCoopers (PwC), Nathan Associates, Social Development Direct (SDDirect) and FHI 360.

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

¹ These definitions are taken from the Department for Education Statutory Guidance on Keeping Children Safe in Education, September 2016

Child protection: refers to 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 local policies and procedures and in partnership with other local organisations. It refers to institutional/internal child protection 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 Fund Manager's (FM) responsibility to make sure that where there are concerns over a child's welfare or where a child has been subject to abuse, 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.

Child safeguarding: refers to the action that is taken to promote the welfare of children and protect them from harm. Child protection is 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.

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.

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

Vulnerable adult: refers to a person over 18 years of age who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.² However, the FM acknowledges that other factors such as unequal power dynamic, poverty and gender amongst others can also make a person more vulnerable to abuse.

Acronyms

CFM	Country Finance Monitor
CPCoC	Child Protection Code of Conduct
CTM	Country Technical Monitor
DBS	Disclosure and Barring Service

² As defined in the 1997 Consultation "Who Decides?" issued by the Lord Chancellor's Department

DFID	Department for International Development
FM	Fund Manager
GEC	Girls Education Challenge
ICPC	International Child Protection Certificate
ILO	International Labour Organization
M&E	Monitoring and Evaluation
PM	Portfolio Manager
PMO	Programme Management Office
PwC	PricewaterhouseCoopers
SDDirect	Social Development Direct
SMT	Senior Management Team

1. Introduction

The Girls' Education Challenge (GEC) is a Department for International Development (DFID) 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 lower 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), led by PricewaterhouseCoopers (PwC) in alliance with Nathan Associates, Social Development Direct (SDDirect) and FHI 360, henceforth referred to as alliance partners. 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 DFID 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.

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.

Monitoring of fund recipients, including visits to project communities, is primarily done by the in-country staff including Country Technical Monitors, (CTMs), Portfolio Managers (PMs) and at times Country Finance Monitors (CFMs). However, additional project visits are conducted on an ad hoc basis by the UK based team, including Senior Management Team members, the Finance team, the Monitoring and Learning team and the Evaluation 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 DFID approval.

Fund Manager Organisational Structure:



Purpose

This child and vulnerable adults safeguarding policy sets out the FM's position on working with children and vulnerable adults 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 vulnerable adults 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.

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.

The policy also sets out the FM's high level expectation around child safeguarding for fund recipients.

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 vulnerable adults that they come into contact with. Annex 4 outlines the FM's minimum standards in relation to fund recipients.

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. Compliance of all the alliance partners may be monitored and reviewed by PwC as leader of the alliance throughout the course of the GEC.

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 child protection 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 either to their GEC line manager or anonymously through the whistleblowing mechanism gecpmo@uk.pwc.com or +44 20 7212 1100

2. Policy statement and commitments

The FM is committed to the safety and protection of all children and vulnerable adults and intends that their welfare will at all times be the paramount consideration. It recognises that children, both boys and girls, may be vulnerable and at risk of harm in a variety of ways, and that they have equal rights to protection. The FM also recognises that some adults, such as those with mental health issues, physical disabilities and/or injuries may in some instances also be particularly vulnerable to abuse and violence. The FM will do all it reasonably can so that the children and vulnerable adults it is in contact with, directly and indirectly, are kept safe from all forms of avoidable harm.

The FM has a particular focus on girls given the work it is supporting. Girls may be especially vulnerable and at risk from certain forms of harm, including sexual and gender-based violence. The GEC Alliance recognises that violence towards and abuse of girls is one factor that may limit their access to education, and as such is particularly concerned that girls do not experience physical, emotional or sexual violence, neglect or any other form of harm as a result of their engagement with the GEC programme.

The FM will promote the welfare of children and vulnerable adults it is in contact with, directly or indirectly, through the following protection measures:

2.1 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 the protection of children and vulnerable adults.

The GEC alliance partners shall have recruitment processes in place such that only staff meeting this 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 children and vulnerable adults. 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 children or access to child sensitive data by the Child Protection Lead.
- Applicants to be advised of their responsibilities towards children and vulnerable adults and for roles likely to have contact with these groups, applicants to be assessed on their awareness of child safeguarding and safe practices via standard questions at interview.
- All successful applicants whose roles involve working with/having contact with children shall be required to provide the relevant level of criminal record check for that role. 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 acknowledged³ that this will not always be possible.⁴ Where a criminal record

³ 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.

⁴ 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.

check indicates that a successful applicant is unsuitable for that role, no job offer will be made or any existing job offer withdrawn.

- Where prospective candidates will be working with/having contact with children, young people and/or vulnerable adults, and where a criminal record check has not been possible, the FM requires that they sign a personal disclosure form declaring that there is no reason why they should be excluded from working with children.
- 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. The FM reserves the right to follow up with any previous employer.
- For staff and contractors that will not generally have any contact with children and vulnerable adults (such as UK based management and support staff), these measures need not be carried out. Should these individuals need to have contact with children as part of their work, they will be subject to the above checks before they can do so. Alternatively, they shall be accompanied at all times during any such infrequent contact by personnel who have been appropriately cleared to work with children and vulnerable adults.

Table 1: The likelihood of having contact with children and vulnerable adults		
Level 1: Low (less than once per year)	Level 2: Medium (once per year)	Level 3: High (more than twice per year)
<ul style="list-style-type: none"> • Workstream support staff • PMO staff • Interns 	<ul style="list-style-type: none"> • Senior Management Team • Monitoring and Learning Managers • Evaluation advisers 	<ul style="list-style-type: none"> • Country Technical Monitors • Country Finance Monitors • Portfolio Mangers

A guidance document setting out the safeguards in the recruitment process in detail has been produced and shall be distributed to all alliance partners in order to support their adherence to the above safe recruitment practices.

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.

2.2 Education and training of staff and contractors

The FM understands that, in order for the Safeguarding 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, confident and competent 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	All new joiners will receive and induction as per the below:

	<ul style="list-style-type: none"> • CTM, CFMs and other in country staff will be inducted by the PM for their region within one month of joining. • PMs, Monitoring and Learning Managers, Evaluation Officers and PMO Manager will be inducted by the Child Protection Lead within two month of joining. • All other staff will be inducted by PMO (PMO Manager) within one month of joining.
Existing staff	<ul style="list-style-type: none"> • Annual refresher training • Inclusion of key information from this policy (including reporting lines) in team news/bulletins on a bi-annual basis • Other ad-hoc training to be scheduled in response to identified needs as required, for example in response to updates to this policy • A one page summary of this policy to be circulated periodically and particularly during periods of high travel volume to remind staff and contractors of the policy bulletin

2.3 Code of conduct

The FM's child protection code of conduct (CPCoC) is included in Annex 3. The FM requires staff and contractors to comply with the CPCoC and will take appropriate action against personnel who breach the code. This may include disciplinary action in line with the provisions of the relevant GEC alliance partners' processes, and/or referral to the relevant authorities for appropriate action, including possible criminal prosecution.

All staff and contractors are required to sign an undertaking to comply with the code and return it to the FM's Programme Management Office (PMO). A central repository is kept for all staff and contractors employed by the FM along with their signed CPCoC declaration and records demonstrating that they have completed any relevant training.

2.4 Responding to child protection concerns

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

Details of reporting mechanisms are widely publicised (these are described below).

2.5 Reporting process

The reporting process is illustrated in Annex 1. FM staff and contractors may report their concerns via email, telephone, in person to their GEC line manager or any member of the GEC senior management team. If for any reason it is not possible to report using these routes, reports may be made through the GEC whistleblowing email address gecpmo@uk.pwc.com

or the GEC emergency telephone line +44 20 7212 1100. This e-mail 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. Reports can be made anonymously.

- The GEC Risk and Mobilisation Lead and relevant members of the GEC Senior Management Team and the Child Protection Lead will be informed immediately, and will make sure that incidents are dealt with appropriately.
- Annex 2 contains a template that may be used by those reporting a potential Child Protection 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.
- The safety and wellbeing of the child, children or vulnerable adult(s) is the paramount consideration and immediate steps must be taken as necessary to protect them and to address any possible urgent medical needs.
- 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.
- A virtual or in person case discussion involving the GEC Risk Manager, relevant members of the GEC Senior Management Team, the Child Protection Lead and other colleagues if appropriate will be held within 24 hours to discuss the nature of the case and to take decisions on next steps.
- Concerns relating to issues in a fund recipient organisation, any of its consortium members or implementing partners/contractors will be referred to the Head of Agency 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 fairly and consistently under the oversight of PwC's Risk & Quality Team with the full support of the GEC Senior Management Team, the Senior Management of any relevant Alliance Partners, the GEC Risk and Mobilisation Lead, and the Child Protection Lead (unless any factors of the case preclude the involvement of specific parties). Investigations will be objective, transparent, and will be guided by professional expertise and support when required.

When should I report a concern?

The FM places a mandatory obligation on all staff and contractors to immediately report concerns, suspicions, allegations and incidents that indicate actual or potential abuse of children. While adults perpetrating violence against children do not necessarily exhibit specific behaviours, there are a few examples of behaviours or situations that you may wish to note that could indicate abuse:

- Is a person trying to find ways to be alone with a child?
- Do children look uncomfortable or try to find ways to not be near one person in particular?
- Have you observed any contact between a child you have visited and a staff/contractor in a context where they should not be interacting?
- Do you have any concerns that the relations between a child and a staff/contractor is not healthy?

In addition, each report will be logged on an incident tracker as per the diagram on the next page. This will allow the FM to track concerns and understand any potential child and vulnerable adults safeguarding patterns.

Category	Definition	Reporting lines	Placed on tracker held by	Escalation
1	Cases involving FM staff and contractors (breach of FM's safeguarding policy)	Line manager and then PMO or directly to PMO	Risk and Mobilisation Lead	SMT immediately DFID as necessary if involving violence against a child or any form of sexual violence (as opposed to a breach of communications guidelines or data protection). CP Lead also to be notified to gather lessons learned from the incident
2	Cases involving fund recipients (lead partners, consortium partners, implementing partners, contractors) staff, contractors or volunteers	Projects to PM to CP Lead to Mobilisation Manager	CP Lead and Risk and Mobilisation Lead	SMT (and DFID as necessary) if: <ul style="list-style-type: none"> ▪ Case responded to unsatisfactorily by project ▪ When a trend is observed ▪ Reputational issue
3	Cases involving GEC beneficiaries or community members that are reported to the FM	Project to PM to CP Lead	CP Lead	Risk and Mobilisation Lead if: <ul style="list-style-type: none"> ▪ Trend of cases not responded to appropriately ▪ Reputational issue
4 (Design or implementation problem)	A situation where the design or implementation of a project either gives rise to immediate or serious potential child protection concerns.	Projects to PM to CP Lead	CP Lead	Risk and Mobilisation Lead if: <ul style="list-style-type: none"> ▪ There is a risk of serious harm to children/communities ▪ There is a risk of or immediate harm to children/communities ▪ There is a risk that this would be a reputational issue

2.6 Mitigation measures

The FM charges all 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 safeguarding children and vulnerable adults.

All staff and contractors are obliged to create and maintain an environment that prevents exploitation and abuse. However, managers at all levels have a particular responsibility to support and develop a culture and system that maintain this environment.

The PwC Lead Partner for the GEC, David Armstrong, is ultimately responsible for managing effective implementation of the programme and its policies and 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 Child Protection Lead is responsible for building the capacity across the different teams to implement this policy and quality assuring processes across different teams, while PMs 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 children and vulnerable adults as a result of any the GEC Alliance funded activity are integrated into key stages of procurement, programme implementation, monitoring and evaluation processes.

To complement the safeguards provided in this policy, the FM has also developed a Do No Harm policy to provide a further framework for protection for any child or adult that comes into contact with the GEC.

2.7 Data protection and security

The FM recognises its obligations to process data in line with existing relevant data protection legislation 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.⁵

2.8 Monitoring and review

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. As part of this review the FM conducts an internal review and requires all GEC alliance partners to conduct a self-audit to assess their level of implementation, the results of which to be shared with PwC and the Child Protection Lead who will follow up with the alliance partner on any gaps identified and follow-up actions.

The Child Protection Lead together with PMO and PMs is also responsible for maintaining adequate records to provide evidence of implementation across the FM.

⁵ described in clause 6.1 of the service acquisition agreement, signed by the Alliance members contracted to PwC

2.9 Communication guidelines

From time to time the FM uses images of children in its external communications including social media. While the public use of images and stories of children poses potential protection risks to the subjects, the FM exercises great care in using the images and stories of children in such a way as to avoid increasing risks and vulnerabilities of those portrayed. Choices of images and messages are made based on values of respect including respect for privacy, dignity, equality, fairness, and justice⁶ and where appropriate pre-approved by DFID before use.

The FM will exercise sensitivity and caution in determining the appropriateness and suitability of stories and images, in line with the protection principles contained in this policy. The FM shall not publish personal information about a child that could be used to identify him or her. Children that the FM is aware are vulnerable due to having experienced abuse, for example, shall not have their faces displayed or in any other way be represented in a way that may lead to their identification.

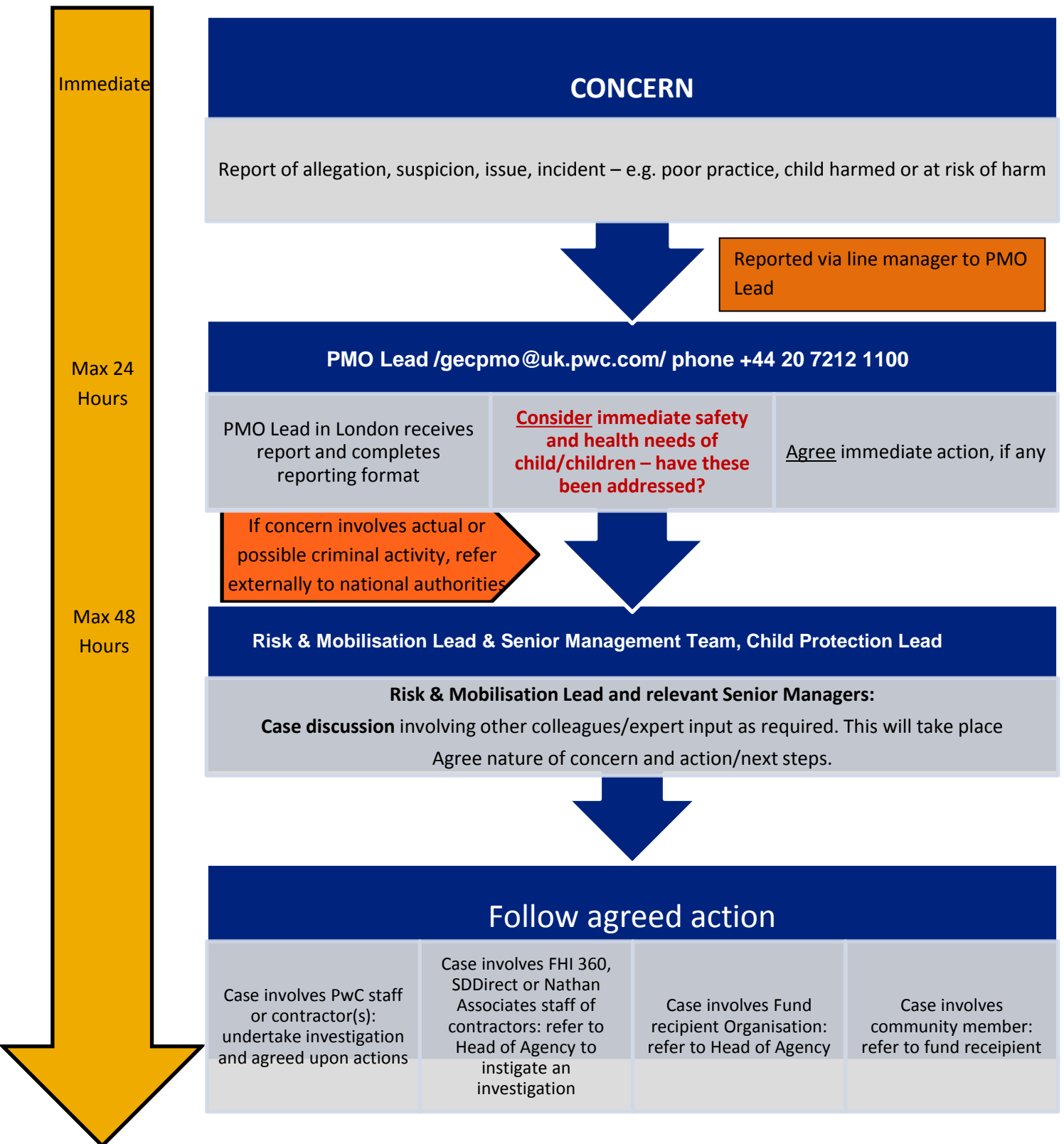
- The FM shall only use photos supplied by fund recipients that demonstrably comply with the media and communication guidelines set out in Annex 5.
- The FM may, on occasion use photographs from other sources but in all cases the criteria outlined in this policy will apply, and any photographers will be fully briefed and required to comply with this policy.

Further guidance is available in Annex 5.

⁶ Adapted from Dochas Code of Conduct on Images and Messages <http://www.dochas.ie/code/>

Annex 1: Reporting process flow diagram

This diagram explains the process to be taken when the FM becomes aware of a concern.



Annex 2: 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 gecpmo@uk.pwc.com 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.

Part One: About You
Name (optional): Your role in or relationship to GEC Alliance (for example staff, contractor, fund recipient): Your relationship to the child or children or vulnerable adult concerned: How can we contact you if we need more information to help the child/vulnerable adult:
Part Two: About the Child/Children/Vulnerable Adult(s)
Name(s) Male/female? Age: Address if know. If address is not known, how can we find this child to help him/her:
Part Three: About Your Concern (continue on a separate sheet if necessary)
Date, time and place of any incident(s): Nature of concern/allegation: Observations made by you (e.g. child's/vulnerable adult's emotional state, any physical evidence): How did you come to have a concern: was abuse observed or suspected? Was an allegation made? Did a child/vulnerable adult disclose abuse?

If the child/vulnerable adult reported the incident to you directly, please write down exactly what the child/vulnerable adult said and what you said:

Is there any other relevant information we should be aware of?

Have you reported the incident to anyone else? If yes, please specify

Time and date of reporting:

Person(s) to whom report was made:

Advice 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/vulnerable adult)?

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 3: Code of conduct

This Code of Conduct provides expected standards of behaviour of GEC Alliance staff and contractors towards children and vulnerable adults such that any contact is positive and appropriate, and keeps children and vulnerable adults safe. The principle is that staff and contractors should avoid actions or behaviour that may constitute poor practice or potentially offensive, harmful or abusive behaviour when working with children and vulnerable adults. *The below focus primarily on interactions with children, however, the FM recognises that many of these behaviours also applies to vulnerable adults.* The below is not an exhaustive list and should be interpreted in a spirit of common sense.

The Code applies to conduct in the professional role, but the GEC Alliance expects everyone to also apply these good practice principles in their personal lives. In situations where GEC Alliance staff and contractors are making project visits and staying in communities that are not your own, you will never be entirely 'off duty' and so standards of behaviour must still apply.

It should be noted that if child/vulnerable adult protection concerns arise in relation to staff and others outside their professional roles (i.e. concerns regarding their behaviour towards children that would constitute a breach of the Safeguarding Policy and Code of Conduct) the GEC Alliance may consider follow up action, including possible disciplinary action.

When working with children 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, including how to contact their GEC Portfolio Manager.
- Immediately report any concerns relating to the safety or welfare of a child you are in contact with to the local manager or your line manager.
- Avoid working 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 for example if a child is hurt or distressed comfort or reassure him/her without compromising his/her dignity.
- Be sensitive to local norms and standards of behaviour towards children.
- Listen to what the children are saying, and respond appropriately.

When working with children YOU MUST:

- Never act in a way that may be abusive or may place them at risk of abuse.
- Not condone, or participate in, behaviour of a child that is illegal, unsafe or abusive.
- 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 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 or concerns expressed by others about their welfare, to go unrecorded or not acted upon.
- Not do things for a child of a personal nature that they can do for themselves.
- Not have a child with whom you are working 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.

The GEC Alliance also subscribes to the following principles on the prevention of sexual exploitation and abuse:

- Sexual exploitation and abuse constitute acts of gross misconduct and will be subject to appropriate disciplinary action including dismissal.
- Sexual activity with children (persons under the age of 18) 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.
- Sexual relationships between staff and any adult beneficiaries of GEC-funded programmes, since they are based on inherently unequal power dynamics, undermine the credibility and integrity of the work of the GEC and are strongly discouraged.
- Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of any assistance that is due to children with whom we work.
- Staff and contractors are obliged to create and maintain an environment which prevents sexual exploitation and abuse, and promotes the implementation of this code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

Declaration

I _____ fully understand and agree to abide by the attached Code of Conduct and the GEC Alliance’s Safeguarding Policy, including all its annexes. I understand that any breaches of the Code of Conduct and the Safeguarding Policy will be reported to the GEC Senior Management and appropriate action will be taken in accordance with the relevant policies and procedures.

I have read the attached policy and all the annexes

Signature: _____ Date: _____

Annex 4: Child protection guidance for projects

Child Protection programming and capacity

By placing child protection at their core, education projects are able to both fulfil children's rights to be free from violence and make sure that students have a positive experience of school and education. 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 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 capacity in place from the outset. This includes the capacity to conduct child protection and do no harm assessments to ensure the safety of children in project activities and to mitigate any potential emerging child protection issues. Experience from GEC 1 showed that many projects ended up working with children who had experienced violence through interventions such as awareness raising around child rights, sexual and reproductive health and girls' clubs interventions. Projects should therefore think carefully about how child protection might feature in the logic chain to support girls' education.

Child safeguarding policy

All projects will need to comply with the GEC standards related to child safeguarding. A child safeguarding policy is where organisations show a commitment to prevent children from violence and exploitation perpetrated by staff and (sub)contractors within an organisation, by putting in place policies and procedures to minimise these risks. The GEC has developed 12 minimum standards outlined below that all lead and implementing partners will need to adhere to.

All GEC fund recipients will need to complete a self-audit to show adherence to these standards and submit to the FM for consideration during the inception phase before projects can commence implementation.

The 12 guidelines on child safeguarding within recipient organisations (mandatory for all fund recipients)

Area of safeguarding	Minimum standards for GEC recipients
Policies and procedures to keep children safe	<ol style="list-style-type: none">1. All organisations (lead, implementing or other partners or contractors) must have a written, comprehensive Child Protection Policy that includes a Code of Conduct that all staff must review, sign and adhere to. Each organisation will need to be able to show that they have their own policy in place and that this is being implemented.2. The consequences of staff breaching the Policy are clear and linked to organisational disciplinary procedures.3. There are clear, well-publicised reporting procedures in place that allow staff, children and families to raise concerns confidentially about poor practice, unacceptable behaviour or actual/potential abuse by staff or contractors and that provide step-by-step guidance on what action to take.

Preventing harm to children	4. There are policies and procedures or agreed ways of recruiting staff and partners that include assessing their suitability to work with children such as reference checks, and that where possible, police checks are undertaken.
Implementation and training	5. All members of staff, including volunteers, will have training on child protection when they begin work on the project, which includes an introduction and agreement to adhere to the organisation's Child Protection Policy and Procedures
Information and communication	6. Children and families are made aware of their right to be safe from exploitation and abuse at the hands of staff and associates and how to make complaints, including via a child-friendly mechanism, should any issues or incidents arise. 7. Everyone in the organisation is informed of which named staff member/s have specific child protection responsibilities under the Policy and how to contact them.
Monitoring and review	8. The implementation of organisational protection measures is subject to regular (every two years) monitoring and review using the Child Protection Self-Audit Tool as provided in the recipient self-audit to check that adequate steps have been taken and to assess the effectiveness of these measures. The audit will need to be submitted to the Fund Manager for consideration. 9. All concerns, incidents or allegations of abuse and complaints are taken seriously, responded to appropriately, recorded, followed up and monitored.
Partnership responsibilities	10. Contractors/Consultants working with children must meet the above standards and make sure that their sub-contractors working with children also have in place measures that mean they are in compliance with the standards. 11. There are clear lines of accountability within consortia, with the lead partner being responsible for ensuring adherence to the GEC minimum standards.
Reporting to FM	12. Any breaches of these minimum standards need to be reported to the Fund Manager immediately by the lead partner.

Protection of young women (18+ years)

The FM recognises that in some instances GEC fund recipients may work with girls who are older than 17 and would therefore be classed as young women rather than children and not covered by either international or national child rights legislation. However, these young women face many similar challenges to adolescent girls, including being vulnerable to different forms of gender based violence (GBV), 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 risks that these young women may face and so that interventions do not put them at undue risk and that identified risks are mitigated to the extent possible.

Annex 5: Communications guidelines

The FM may occasionally use images or videos of children 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/vulnerable adult and the parent/guardian using the consent form in Annex 6. This needs to be shared with Clare Convey (convey.clare@pwc.com 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 child and the guardian. Child friendly consent forms (see Annex 6) should be used for obtaining consent from children and where possible, the child and family should be shown the image before it is published.

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 parents/guardians. Any individuals who wish to opt out (or in the case of children/vulnerable adults whose parents/guardians 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?
- 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 fun recipients that meet these standards. Where fun 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. In addition, their real names should be changed, and this change be indicated on the publication.

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.

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 full child protection policy, 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 the Child Protection Policy is written into the contract, and a copy of the Policy, 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 gecpmo@uk.pwc.com

Please return the completed form to Claire Convey, either in hardcopy or scanned to convey.clare@pwc.com

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

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