

# The categories of concerns that implementing partners report to the GEC Safeguarding Team

CAT. #	DEFINITION	RESPONSIBILITY FOR CASE HANDLING
<b>1. Fund Manager (FM) safeguarding policy breach</b>	<p>Concerns involving Fund Manager staff, contractors or volunteers as an alleged or potential Person of Concern/Subject of Concern (PoC/SoC).</p> <p>This includes breaches of all safeguarding policies and codes of conduct (e.g., child safeguarding, sexual exploitation and abuse and sexual harassment, bullying, harassment). Safeguarding breaches in this concern category should be reported whether the alleged survivor is a member of staff, beneficiary, or community member.</p>	Fund Manager alliance partners <sup>1</sup>
<b>2. Fund recipient safeguarding policy breach</b>	<p>Concerns involving fund recipients (lead partners, consortium partners, implementing partners) staff, contractors or volunteers as an alleged or potential PoC/SoC.</p> <p>This includes breaches of all safeguarding policies and codes of conduct (e.g. child safeguarding, sexual exploitation and abuse and sexual harassment, bullying, harassment). Safeguarding breaches in this concern category should be reported whether the alleged survivor is a member of staff, beneficiary, or community member.</p>	Project
<b>3. Higher-level duty of care protection incident</b>	<p><b>Protection incident reported:</b></p> <ol style="list-style-type: none"> <li>Involving (as a PoC/SoC) 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.</li> <li>Occurring within non-formal 'partner' schools or in other non-formal 'partner' institutions.</li> <li>Occurring on the way to school/activity.</li> <li>High-risk beneficiary child-to-child violence.</li> </ol> <p><b>Implementing partners should report cases of:</b></p> <ul style="list-style-type: none"> <li>Sexual violence reported to them in partner schools.</li> <li>Acts of physical violence or threat of physical violence which has or is likely to cause serious injury (heavy bruising, wounds, broken limbs, drawing of blood). Examples include hitting, slapping, choking, shoving, burning, use of a stick/other weapon or any other act which results in physical injury. This includes incidents named as 'corporal punishment'.</li> </ul> <p><b>Implementing partners can report cases of (but don't have to):</b></p> <ul style="list-style-type: none"> <li>Emotional and verbal abuse.</li> <li>Bullying.</li> </ul>	<p>Outside of project's immediate responsibility (as the PoC/SoC is not employed by the project), so project should not take on case handling.</p> <p>However, implementing partners should have influence over investigation process and/or influence over lessons learnt and actions which follow.</p> <p>Implementing partners must ensure safety of the complainant and/or survivor and facilitate access to services if the responsible actor has not already done so.</p> <p>Implementing partners should monitor the situation and an increase in 'discovery' methods (focus groups, increased feedback mechanisms, increase in participatory monitoring methods) employed by projects in cases of high-risk.</p>

<sup>1</sup> The GEC Fund Manager draws on technical expertise provided by all Alliance Partners with a global team spread across three continents. The GEC Fund Manager is led and administered by PricewaterhouseCoopers and Cambridge Education, working with organisations including Nathan Associates London and Social Development Direct. Social Development Direct leads on the Safeguarding Workstream and critically brought to the workstream technical expertise in rights-based approaches to development, GBV prevention and response, child protection, protection from SEAH, child safeguarding, organisational change, gender transformative, education programme expertise, and insights from efforts to reform the development sector through campaigns and whistleblowing.

## MORE ON: TYPES OF CONCERNS

<p><b>4. Design or implementation problem/Do No Harm</b></p>	<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.</p>	<p>Project</p>
<p><b>5. Health and safety concern</b></p>	<p>Health and safety concern raised regarding danger/actual harm coming to a beneficiary in, or on the way to, a project site due to environmental issues (fire, electrics, infrastructure, sanitation etc.).</p>	<p>Project</p>
<p><b>6. Contextual safeguarding concerns</b></p>	<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 or focus groups; generalised concerns of sex for grades in focus groups or other organisation's reports where there is not a specific incident identified or where a survivor does not disclose directly.</p> <p>Where a school or facility is named in the contextual safeguarding concern or where there are staff members, volunteers or associated personnel employed by the GEC project. This concern should be categorised as a category 2 and that process should be applied.</p>	<p>Project</p>
<p><b>7. GBV, child protection or broader protection issues</b></p>	<p>General GBV and child abuse cases where survivors are women, men, boys or girls taking part in any of the GEC projects and the project requires support (not all cases relating to this category need to be reported, however the project has a duty of care and responsibility to ensure appropriate referrals are in place). Implementing partners should not mediate or respond with a protection response unless this is a part of their specialised skill set, and they have appropriately resourced this area of work through their project activities.</p> <p>Implementing partners should always report when a beneficiary has passed away due to murder, manslaughter or suicide. Similarly, attempts of this nature should also be reported. Support will be offered to implementing partners in these instances.</p>	<p>General GBV and child abuse cases – project does not have responsibility to investigate – although survivor assistance should be assured as should referral to appropriate and safe child protection/ GBV actors.</p>

For GEC implementing partners, category 2 concerns are safeguarding concerns in their most concrete form. Within category 2 concerns, the implementing partner has direct responsibility for the Subject of Concern in this kind of allegation. Category 3 concerns, however, involve an incident where the implementing partner has no direct responsibility regarding the Subject of Concern, but *do have a duty of care* to the beneficiary and a responsibility to respond with advocacy, promotion of services, safety mapping, and referral of the survivor.

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