
Girls' Education Challenge

GEC Fund Manager and Associated Personnel Safeguarding Policy

Approval Date: May 2021

Policy Owner: David Armstrong, PwC Engagement Partner

Cross Reference/ Related policies:

- GEC Do No Harm Policy
- GEC Whistleblowing Policy
- FCDO Supply Partner Handbook
- PwC Safeguarding Approach for FCDO Funded Programmes
- PwC Supplier Partner Declaration

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

If you have a safeguarding concern involving a GEC fund recipient please contact the GEC's Safeguarding Lead, danielle.spencer@girlseducationchallenge.org and/or uk_gec_pmo@pwc.com

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Acronyms

CFM	Country Finance Monitor
DBS	Disclosure and Barring Service
FCDO	Department for International Development
FM	Fund Manager
GEC	Girls' Education Challenge
ICPC	International Child Protection Certificate
PM	Portfolio Manager
PMO	Programme Management Office
PwC	PricewaterhouseCoopers
SDDirect	Social Development Direct
SMT	Senior Management Team

Policy Review Controls at the GEC All safeguarding policies at the GEC must be reviewed annually. The policy should be updated by the Policy Owner for the following reasons:

- A change in law which may affect the policy
- An incident or policy violation which brings about a need for review
- Identifying Policies and Procedures that need to be updated
- Routine review to ensure accessibility, consistency and relevance.

Version Control		
Version Number	Details of change (including page numbers)	Date of Approval by Board

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), led by PricewaterhouseCoopers (PwC) in alliance with Cambridge Education, Nathan Associates and Social Development Direct (SDDirect). In addition to the Alliance Partners, FCDO directly places some of its own staff into the FM team.

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. However, in times of crisis, some of our team members may be relocated to other parts of the world for their own safety, and/or work from 'home'.

Monitoring of Fund Recipients, including visits to project communities, is primarily done by Technical Monitors, Portfolio Managers (PMs) 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 members, the Finance team, the Monitoring and 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 document outlines the FM's Safeguarding Policies. All staff and contractors of the FM should familiarise themselves with this policy and the more detailed sub-policies and guidance it encompasses. Alliance Partners should also familiarise themselves with it, to aid them in various HR processes and to support them in their understanding of how safeguarding policy breaches involving an FM staff member or contractor are to be handled.

This document is a comprehensive, overarching policy which contains several sub-policies within it dealing with specific aspects of safeguarding:

- 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 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 concerns regarding bullying and non-sexual forms of harassment, see the GEC's [bullying and harassment policy](#). 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* and to the summary of external whistleblowing options provided within this document ([below](#)). 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* and to the [summary below](#). For safeguarding guidance regarding communications, [please see our guidance below](#).

The principal aim of the policy and subsequent practice is to protect beneficiaries from wrongdoing perpetrated by FM staff and contractors. In addition, the policy also serves to protect staff and contractors as well as the reputation of the GEC, 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 breach of safeguarding policy and associated code of conduct they come across to the FM via the reporting mechanisms provided. If the breach of policy concerns one of the GEC's Fund Recipients and is noted when interacting within project communities, they should notify the relevant project they are visiting using the project reporting mechanisms and procedures (which they should be familiar with if visiting a project). FM staff members should familiarise themselves with the types of concerns the FM expects Fund Recipients to report. These categories are listed in [Annex 3](#).

The FM is committed to addressing all forms of abuse, whether physical, psychological, sexual, or bullying and harassment. This means that we take all concerns seriously and carry out timely and robust responses to complaints. No one will be victimised for making a complaint and the FM is committed to working with complainants and victims/survivors to make certain 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 and in inequality more broadly. Because of the gendered, racial, geographical and material power imbalances which are present in the international aid sector, the FM has a duty to apply 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, 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 gender-based violence and sexual exploitation, abuse and harassment, by perpetrators with increased power. Most often, perpetrators of gender-based 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. However, for detailed information on the way in which the FM engages with Fund Recipients regarding safeguarding compliance and case handling, please see the *Fund Recipient Handbook*.

2.2 Scope

This 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 safeguarding policies and processes in place. [Annex 3](#) outlines the FM's minimum standards in relation to Fund Recipients.

2.3 Alliance Partner compliance

The GEC Alliance Partners are required to go through the FCDO Due Diligence process and adhere to the FCDO Supply Partner Handbook (2020).

Key points from the FCDO Supply Partner Handbook are below:

- Supply Partners and their downstream partners must be compliant with the FCDO Supply Partner Code of Conduct ('The Code').
- Supply Partners are contractually obliged to adhere to The Code. Supply Partners are also responsible for managing sub-contractors to ensure they sustain their compliance with The Code throughout the life of a contract.
- All delivery chain partner employees working on FCDO Contracts must be made fully aware of the FCDO reporting concerns mailbox¹
- All supply partners confirm that they and their workforce are aware of the FCDO procedures to report suspicions or allegations of aid diversion, fraud, money laundering or counter terrorism finance to the Counter Fraud and Whistleblowing Unit.
- Safeguarding, social responsibility and respect for human rights are central to FCDO's expectations of its Supply Partners. Supply Partners must ensure that robust procedures are adopted and maintained to eliminate the risk of poor human rights practices within their complex delivery chain environments funded by FCDO. These practice include: sexual exploitation, abuse and harassment; all forms of child abuse; inequality or discrimination on the basis of race, gender, age, religion, sexuality, culture or disability.
- Supply Partners must place an emphasis on the control [...] of further unethical and illegal employment practice, such as modern-day slavery, forced and child labour and other forms of exploitative and unethical treatment of workers and aid recipients.
- [Supply Partners must have in place policies and procedures] to prevent actual, attempted or threatened sexual exploitation and abuse or other form of inequality or

¹ The FCDO reporting concerns email is: reportingconcerns@fcdo.gov.uk. This email may be used as a whistleblowing mechanism for FM and FR staff members who do not feel comfortable in using other reporting mechanisms (see the whistleblowing section for further information). The FM reports some safeguarding incidents to FCDO. Guidance on this can be found within FM case management guidance to projects.

discrimination by employees or any other persons engaged and controlled by the Supply Partner to perform any activities relating to FCDO funded work.

- Supply Partners can demonstrate compliance [by]:
 - Retaining board minutes and Senior Management Team (SMT) agendas on regular review of policies and procedures (including details of learning and updated policy as a result of incident)
 - [Delivering] mandatory Training on safeguarding recorded and signed by staff members and held in personnel folders/files.
 - [Ensuring] complaints procedures in place and used.
 - Review of protocols for victims or survivors including available support.

To become a GEC Alliance Partner, Alliance Partners should have corresponding policies in place regarding the behaviours prohibited within this document and within the Code of Conduct (which are all in line with the FCDO Due Diligence).

Where there is not alignment between the GEC and an Alliance Partner policy, the more comprehensive policy should generally be deemed applicable where practicable. However, the policy will not take precedence over contractual or legal obligations (such as those set out in contracts across the supply chain or in terms and conditions of employment).

Compliance of all the Alliance Partners is monitored and reviewed by PwC, the lead Alliance Partner, throughout the course of the GEC contract and reported to FCDO on an annual basis.

The FM will ensure Fund Recipients and members of Alliance Partner staff working on the GEC are aware of this policy.

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 (danielle.spencer@girlseducationchallenge.org) or through the whistleblowing mechanism - uk_gec_pmo@pwc.com or +44 20 7212 1100 – if they feel uncomfortable reporting in this way, or if they would prefer to report anonymously.

3. Policy statement and commitments

The GEC recognises that all girls, women, boys and men who come into contact with the GEC should feel safe from violence, exploitation, abuse and harassment. We further recognise that violence, exploitation, abuse and harassment are endemic issues within society, which are based on structural and hierarchical power differentials, and abuses of these inequalities. The GEC's responsibilities lie in preventing, mitigating and responding to violence, exploitation, abuse and harassment that is within their power to address.²

For FCDO, safeguarding broadly means “avoiding harm to people or the environment”.³ FCDO's strategic focus within safeguarding is centred on safeguarding against sexual exploitation, abuse and harassment. FCDO's strategic objectives in this area are to work on frameworks, policies and codes whilst also driving up standards across the aid sector, including within the UK government. Although FCDO's strategic focus within safeguarding is centred on safeguarding against sexual exploitation, abuse and harassment; operationally FCDO take a comprehensive view of safeguarding, incorporating both environmental and social safeguards.⁴

The GEC shares the strategic objectives of FCDO with regards to SEAH as well as their aims for stronger safeguarding overall within the aid sector. However, the definition of safeguarding used by the GEC differs slightly from that used by FCDO.

The GEC's safeguarding work is centred on child safeguarding, safeguarding against sexual exploitation, abuse and harassment and includes bullying and harassment (including non-sexual harassment). GEC FM definitions are contained within [Annex 7](#). The GEC's focus on safeguarding is therefore on **the prevention of, mitigation of and response to violence, exploitation, abuse and harassment, which occurs due to structural and hierarchical power inequality and the abuse of that inequality by individuals or entities because of action or inaction.**

The GEC has a particular focus on protecting girls. Girls are especially vulnerable and at risk from certain forms of harm, including gender-based violence, due to their dual vulnerability through 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 risk of harmful traditional practices being perpetrated against them – such as child marriage and female genital mutilation.

The GEC 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.

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

² See below regarding roles and responsibilities for further details

³ Foreign, Commonwealth and Development Office, 2020. *UK Strategy: Safeguarding Against Sexual Exploitation And Abuse And Sexual Harassment Within The Aid Sector*. London: FCDO.

⁴ For further information on FCDO's position on Environmental and Social Safeguards see: Department for International Development, 2014. *Environmental And Social Safeguards*. London: Evidence on Demand.

3.1 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 its activities.

The principal aim of the policy and subsequent practice is to prevent the risk of harm to children and adults at risk because 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, 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 abuse⁵ they come across as part of their interactions in project communities adjacent 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.

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 Partner through which you are engaged, and at the Fund Recipient 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 preclude 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.

⁵ Whether witnessed, suspected, or disclosed

When working with children or adults at risk you must:

- Never act in a way that may be illegal, unsafe or 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, 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 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.
- Not marry a child.
- Where you believe there may be a conflict between this policy and local law or local norms, you should consult the FM Safeguarding Lead.

3.2 The GEC Protection from Sexual Exploitation, Abuse and Harassment Policy

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

The principal aim of the policy and subsequent practice is to protect 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 abuse⁶ of sexual exploitation, abuse and harassment (including GBV, as defined by this

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.

⁶ Whether witnessed, suspected, or disclosed

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

In relation to the protection from sexual exploitation, abuse and harassment - 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.⁷
- 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.

3.3 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 abuse⁸ of sexual exploitation, abuse and harassment they come across as part of their interactions within the workplace.

In relation to the protection from sexual exploitation, abuse and harassment at work – FM staff and 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 Risk Management 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.
- Keep romantic and/or sexual relationships with other staff members a secret from the FM. Relationships must be declared as soon as possible to their line managers

⁷ Informed consent: permission granted in full knowledge of the possible consequences.

⁸ Whether witnessed, suspected, or disclosed

and/or the Risk Management 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 with work colleagues, Fund Recipients or prospective Fund Recipients.
- Commit any act of gender-based violence against work colleagues, Fund Recipients or prospective Fund Recipients.

3.4 The GEC Bullying and Harassment Policy

The FM values a safe and inclusive work environment for all staff and expects that all FM staff and associates treat each other and Fund Recipients 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 these policies and the behaviour protocols it outlines. Bullying and harassment can come in many forms. The list of behaviours below are not inclusive of all bullying and harassing behaviour.

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;
- Make sure all acts of bullying, victimisation or retaliation are investigated appropriately.

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.
- Repeatedly assign tasks or deadlines which are impossible to meet or inappropriate for the scope or seniority of their role in a way that is likely to undermine an individual's morale or sense of professional self-worth.
- Copy (Cc) emails that are critical about someone to others, who do not need to know or use blind copy (Bcc) on emails in a similar way.
- Make threats or comments about job security without foundation.

- Repeatedly change workplace arrangements to inconvenience a particular employee.
- Repeatedly, excessively scrutinise a person's work over and above the scrutiny applied to others' 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.

3.5 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 the principle of Do No Harm (DNH) to their work. It also considers some additional policy issues such as what to do if a DNH issue is identified and the education and training needs of FM staff. The FM is committed to considering DNH principles across its activities. The full policy can be downloaded [here](#).

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 beneficiaries.

DNH risks and opportunities are usually most evident where a project is being implemented and will be context specific. Fund recipients are therefore responsible for carrying out context analysis and assessing how their interventions interact with that context, taking steps to prevent harm wherever possible and maximise positive impact. The FM is responsible for managing material risks across the portfolio and for managing the fund in a way that maximises the positive impact of FCDO's investment and minimises any potential harm. In practice this means (1) understanding DNH risks (2) escalating appropriately when issues arise, and (3) following-up on concerns at a project level through and outside of our reporting cycles.

Staff members of the FM who identify an issue of DNH should report this issue to the Safeguarding Lead. The DNH issue will be recorded on the FM's case management platform and managed by the FM Safeguarding Team in concert with the relevant Senior and Deputy Portfolio Advisor.

A DNH issue which should be reported to the FM Safeguarding Team is defined within the FM's safeguarding reporting guidance as:

"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.

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.”

3.6 The GEC Safeguarding and Communication Policy

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 5](#). This needs to be shared with Comms Manager, Clare Convey (convey.clare@girlseducationchallenge.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 subject of the media and their parent/caregiver (where appropriate). The consent form in [Annex 5](#) 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, or other forms of gender-based violence. Adults should provide informed consent with regards to the use of their image in association with content pertaining to sexual violence, or other forms of gender-based violence.

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).

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 apply 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

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 of children.
- Make certain 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, or other forms of gender-based violence. Adults should provide informed consent with regards to the use of their image in association with content pertaining to sexual violence, or other forms of gender-based violence.

3.7 Other Channels for Whistleblowing

For the GEC's overall approach to whistleblowing, please see the *GEC's Whistleblowing Policy*. This outlines ways of 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. In the UK, 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 that you believe may happen in the near future.

Whistleblowing covers matters that are in the public interest only; whistleblowing is really 'making a disclosure in the public interest'. Personal grievances, such as bullying, harassment or discrimination are not covered under whistleblowing policies, unless this public interest test applies.

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.

1. Report to FCDO: you can report to FCDO directly at reportingconcerns@FCDO.gov.uk.
2. You can inform the police about a crime or if you are worried about someone's safety.
3. If you need advice about blowing the whistle on a charity call [Protect](#)'s free and confidential advice line: +44 (0) 800 055 7214

The GEC has a zero-tolerance policy to retributive action. All whistleblowers will be treated fairly by the FM.

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.

GEC Alliance Partners should have recruitment processes in place such that only staff meeting these criteria are employed or contracted by the FM. These processes should contain measures that aim to deter and detect anyone that may pose a risk to our beneficiaries or put them at risk.

Specifically, all Alliance Partners must 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. Questions are also to be asked with regards to clarifying applicants' attitudes towards gender, disability, sexual orientation and gender identity and race/ethnicity. Specific questions are to be asked about buying sex, sexual exploitation and gender-based violence using scenario examples.
- All successful applicants whose roles involve working with/having contact with children or adults at risk 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 acknowledged⁹ that this will not always be possible.¹⁰ Where a criminal background check is not possible, further references will be required.
- 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.
- 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

⁹ 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.

¹⁰ 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.

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 for all employees. Employees should be made aware that the offer is provisional and the final decision will be based on information references and criminal record checks.
- Where there is an urgent need to engage Level 1 and 2 staff members, at the FM Education Director's discretion, Level 1 and Level 2 staff may start work without background checks in place, as long as they are completed within the first month of engagement. During this first month, these personnel should not have contact with beneficiaries of the GEC, nor should they visit any project or activity. If the background check comes back unsatisfactorily, the staff member should immediately cease employment with the FM. Alliance Partners should have clauses within their standard terms of engagement (whether an employment contract or a contract for services) that facilitate removal from FM duties within their probationary period in the event of unsatisfactory completion of background or reference checks.
- Background checks are to be conducted for FM staff members and contractors who are most likely to have contact with beneficiaries 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

Level 1: Low	Level 2: Medium	Level 3: High
(less than once per year)	(once per year)	(more than twice per year)
<ul style="list-style-type: none"> • Finance team • PMO staff • Interns 	<ul style="list-style-type: none"> • Senior Management Team • Evaluation Advisers • Workstream Leads 	<ul style="list-style-type: none"> • Technical Monitors • Country Finance Monitors • Deputy/Senior Portfolio Advisers • Regional Education Advisers • Monitoring and Learning Managers

Should an Alliance Partner outsource FM related work to a third-party organisation, it should 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 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 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)	<p>All new joiners will receive an induction as per the below:</p> <ul style="list-style-type: none">• The Operations Team organises inductions for all new joiners and will incorporate safeguarding policies and procedures within this.• The Operations Team will be supported during inductions and any additional training by Safeguarding Team upon request and as appropriate.• Any level 2 or 3 joiners will be inducted before conducting any field work for the Fund Manager.• It is the responsibility of an individual's line manager to make sure that they have received an appropriate induction and this should be recorded on the tracker by the Operations Team.
Existing staff (part-time, full-time and regular contractors)	<ul style="list-style-type: none">• Annual Safeguarding Training covering this policy, other Safeguarding-related policies, reporting and other safeguarding basics (including power and ethics)• 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• All staff and contractors are to promote reporting mechanisms and the GEC's Code of Conduct via their signature.

4.3 Code of conduct

The FM's Code of Conduct (see [Annex 4](#)), lists prohibited and expected behaviour of staff members, contractors and managers in relation to the FM's Safeguarding Policies. The Code of Conduct is not exhaustive and should be interpreted in a spirit of common sense. The FM Code of Conduct should be read in conjunction with the contracting Alliance Partner's Code of Conduct. Where Codes of Conduct do not align, the more comprehensive Code of Conduct will be deemed applicable.

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' 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.

4.4 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 protection from sexual exploitation, abuse and harassment, and all forms of GBV. Further, managers are to be aware of gender, race, sexual orientation and other equality issues, and the way in which they may intersect. It is important that they are sensitive to these issues and fully aware of 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. However, 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, David Armstrong, is ultimately responsible for managing effective implementation of the programme and its policies, and for 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 are designated as the focal points for implementation of the policy at the regional level. The Operations Team is responsible for record keeping and coordination with Alliance Partners, and for keeping a register of training, Code of Conduct compliance, etc.

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 as a result of any the GEC Alliance funded activity are integrated into key stages of procurement, programme implementation, monitoring and evaluation processes.

4.5 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, personal data.¹¹

4.6 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 the Operations Team and Senior Portfolio Advisors are also responsible for maintaining adequate records to provide evidence of implementation across the FM.

5. Reporting and Handling

¹¹ described in clause 6.1 of the service acquisition agreement, signed by the Alliance members contracted to PwC

5.1 Guiding Principles for Handling Complaints¹²

The following guiding principles are to be applied when FM staff members come into contact with safeguarding cases and where they play a role in the management of those cases.

5.1.1 Confidentiality

The FM understands the importance of maintaining confidentiality at all stages of the process when dealing with safeguarding concerns. Confidentiality is critical to a satisfactory outcome to protect the privacy and safety of all concerned. Information relating to the concern and subsequent case handling of that concern 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/legal obligation 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.

Disclosure will be permitted when there is specific permission given by the complainant; when it is required by law; when it is needed to obtain specialist help for the complainant, victim or survivor or advice on the evidence (with the permission of the complainant or where the complainant is a child and it is in their best interest); or to whistleblow on case handling.

If breach of confidentiality is reported to the FM, it will be treated as a breach of this policy.

Accidental disclosure

Accidental disclosure occurs when key details about the complaint are inadvertently revealed, generally in casual conversation or by documents 'falling into the wrong hands'. To minimize the risks of accidental disclosure, The FM Safeguarding Team should develop an action plan, which identifies the risks to confidentiality, defines who is responsible for addressing those risks in each stage of the investigation and identifies ways to prevent disclosure.

Intentional disclosure

Intentional disclosure is more difficult to prevent. To mitigate against intentional disclosure, the GEC will ensure information is limited to the 'need to know' group and choose the investigation team carefully, remaining alert to conflict of interest and taking strong action against anyone who knowingly broadcasts confidential information about the case.

5.1.2 Responsiveness

Each complaint which falls within the scope of this policy is acknowledged in alignment with the agreed GEC response timeframe as outlined in this policy in [Annex 6](#).

5.1.3 Non-retaliation

It is the right of all stakeholders to complain. Any attempt of retaliation against a complainant is considered gross misconduct and the GEC will take immediate disciplinary action against such behaviour.

5.1.4 Objectivity

Every complaint is addressed in an impartial, equitable and objective manner.

¹² Much of the content of this section had been drawn from CHS Guidance

5.1.5 Safety and welfare

The safety of the complainant, alleged victim or survivor, witnesses, person/subject of complaint and staff is paramount. A risk assessment (**following the risk assessment tool template in Annex 8**) must be carried out for each complaint, and safety and welfare precautions must be considered before proceeding to deal with a complaint.

5.2 Case handling process

All FM safeguarding policies, procedures and guidance must be adhered to by GEC staff, contractors, and associated personnel – in addition to the FM Code of Conduct. Where there is not alignment between the GEC and an Alliance Partner policy, the more comprehensive policy should generally be deemed applicable where practicable. However, the policy will not take precedence over contractual or legal obligations (such as those set out in contracts across the supply chain or in terms and conditions of employment).

All case handling processes must adhere to the guiding principles for case handling, listed above.

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 is open to staff from GEC Fund Recipients sending complaints regarding FM staff or contractors' behaviour. 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 (danielle.spencer@girlseducationchallenge.org or through the whistleblowing mechanism – uk_gec_pmo@pwc.com or +44 20 7212 1100 – if the reporter would prefer to remain anonymous. The FM will also accept complaints from external sources such as members of the public, and official bodies.¹³ These details are available on the GEC website and are shared with Fund Recipients through various means of communication and training.

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 a breach of this policy.

5.2.1 Immediate Actions

Where staff, contractors and associated personnel are accused of wrongdoing and this is reported to Alliance Partners or line management within the FM, the Safeguarding Lead should be informed immediately (within 24 hours) and a report made to FCDO (within another 24-hour period). The Alliance Partner or line manager is responsible for ensuring the alleged victim/survivor receives information regarding services available to the victim/survivor (including, but not limited to: health, psychosocial and legal).

The Safeguarding Lead will inform a small group within the FM, based on who needs to know and considering any conflict of interest. This 'need to know' group will usually consist of: Fund Lead, Risk Management Lead; line manager of the alleged wrongdoer; and the designated Safeguarding Focal Point for the relevant Alliance Partner and/or Fund Recipient for both the alleged survivor/victim (where permission is granted and it is safe to do so) and the alleged perpetrator. For PwC, the Safeguarding Focal Point in the first instance is the

¹³ Reporting details are listed on the GEC's website

Engagement Director, who will also report it to the Engagement Partner and/or the Safeguarding Focal Point for the PwC International Development practice more broadly, if warranted.

Communicating about the case outside of the 'need to know' group is a breach of this policy (unless exceptional circumstances are to be considered – as listed under 5.1 of this document).

Alliance Partner responsibility to investigate

Where the complaint involves parties contracted by the Alliance Partner. The Alliance Partner's handling framework and investigation procedures should be followed. The Alliance Partner should inform the Safeguarding Lead about the investigation using the reporting format listed in [Annex 2](#).

FM responsibility to investigate

Due to the nature of the FM and the unique interconnected relationship of the alliance, there may be occasion where the FM would need to lead on the responsibility to investigate. This is outlined below.

Where a complaint is received and it involves two or more Alliance Partners,¹⁴ the FM takes responsibility for leading the investigation in concern with the relevant Alliance Partner safeguarding leads.

5.2.2 FM-led Investigations

Giving the complainant a formal confirmation

Once the right people know about the complaint, the next step is to get back to the complainant with a formal confirmation.

Confirmation is generally a letter (which can be in the form of an email) to the complainant telling them that the GEC has received the complaint and is taking action. It states:

- When and how the GEC received the complaint;
- How the GEC has responded to the complaint so far;
- What the GEC will do next;
- Who is responsible for the complaint;
- Who the complaint should contact with questions or feedback.

This confirmation is important for reasons of accountability and transparency. It shows the complainant that the allegation is taken seriously, and it gives them the information they need to ensure that the GEC is responding appropriately. For the GEC it is a record that it has received the allegation and has handled it properly in the initial stage.

Confirmation should be in writing, discreet and clear. If the complainant does not want a letter, or you believe that creating a written record will put the complainant or others at risk, it is possible to confirm receipt orally. However, investigators should keep a detailed file note of the conversation, including time, date, attendees, matters discussed, decisions taken and any steps identified for follow-up.

All confirmations should be made discreetly. Email is preferred, where that is available as a means of communication with the complainant. On the rare occasion that physical copies are used, letters should be delivered in ways that do not alert others to the complaint e.g., given directly to the complainant or sent in an unmarked envelope. Oral confirmation should

¹⁴ For example, where the alleged survivor is contracted by a separate Alliance Partner to the alleged wrongdoer.

be given in a private location which is not automatically associated with complaints. It may be necessary to ask someone 'neutral' but trustworthy to deliver the confirmation instead.

The complainant should receive the letter of confirmation no more than five working days after the organisation received the complaint. The most senior Safeguarding Team member involved in the need to know group should be responsible for sending the confirmation.

Initial Risk Assessment

Where GEC staff members, contractors or associated personnel are accused or suspected of wrongdoing – the situation will be risk assessed immediately by the GEC Safeguarding Lead. The Safeguarding Lead will make a decision regarding appropriate action toward the alleged wrongdoer to ensure: the safety of the alleged survivor/victim; the safety of others; the integrity of the investigation; mitigation of any reputational or other risk. This may result in the immediate suspension of the GEC staff member, contractor or associated personnel from the GEC FM. Other action may be taken where there is less risk involved – for example where a communication policy has been breached, or where there is an isolated incident of bullying behaviour which has been amicably resolved.

Actions to mitigate risk will be decided on a case-by-case basis. The alleged survivor's/victim's safety and wellbeing will be of paramount concern. However, the alleged wrongdoer's wellbeing should also be taken into consideration and the Fund Manager should be mindful of the duty of care they have to all staff. Any suspension should be temporary and timebound and the risk to the alleged wrongdoer's safety and wellbeing should be assessed and mitigated against before suspension takes place. Suspension should be considered without prejudice and should consider the impact that suspension will have on raising the suspicion of colleagues about potential wrongdoing, and the financial implication of suspension.

Suspension, as with all safeguarding actions must be proportionate to the risk non-suspension places on the investigation and to the safety of the survivor/victim, complainant, and the Person of Concern themselves. Relocation (physically, or within the GEC operating structure) may also be considered as an alternative and should be similarly risk assessed.

The risk assessment tool is listed in the [Annex 8](#) of this document. A list of the risks assessed are below:

- Risk that victims/survivors are negatively impacted by the process of investigation e.g. stigma, bullying, losing their job;
- Risk to complainant/whistleblower of their identity becoming known;
- Risk of retaliation against PoC/SoC by staff/community;
- Risk that breaches of conduct are found to extend beyond the current allegations;
- Risk of abuse or harassment to vulnerable populations by subject of complaint;
- Reputational risk to agency;
- Risk of information leaking;
- Risk of subject of complainant contacting witnesses/others involved in the investigation;
- Risk that survivor/s do not wish to engage with the investigation;
- Other risk to the survivor/victim or the Person of Concern/Subject of Concern.

Investigation Planning

All complaints need to be reviewed and addressed, but not all will require formal investigation process.

The Safeguarding Lead and 'need to know' group will determine:

- Whether the concern constitutes a potential breach of GEC policy;

- Whether there is an identified victim/survivor and Subject of Complaint;
- Whether there is further information required to determine either of the above.

Where further information is required, the FM may decide to look for further information to provide sufficient information to take forward the complaint. This needs to be done extremely carefully, following the same principles as an investigation. Information gathering should be done in a way that does not jeopardise a potential investigation, or present risk to anyone concerned.

The FM will usually decide to conduct an investigation when:

- There is sufficient information to constitute a complaint; and
- Evidence is required to determine whether or not the complaint can be upheld.

Where a complaint is made anonymously, it is good practice to take these seriously and to investigate wherever possible.

Appointing the investigation team

If the GEC Safeguarding Lead, in collaboration with the 'need to know' group decide to investigate, they will appoint an investigation team. This should comprise:

Safeguarding Lead: Investigation Supervisor

Every investigation team should have at least one manager directly supervising the case.

Responsibilities:

- Making key decisions about the direction of the investigation, such as whether to investigate or whether to suspend or redeploy the Person/Subject of Concern during the investigation;
- Producing the ToR for the investigation team (see [Annex 9](#));
- Ensuring risk assessments are in place and mitigations implemented;
- Informing the police where the complaint indicates a law has been broken, following risk assessment;
- Liaising with other appropriate authorities as required, in consultation with Alliance Partners' internal risk management teams;
- Ensuring that safety and confidentiality plans are implemented and that the investigation is conducted according to key principles and procedures;
- Receiving the final investigation report on the behalf of the GEC and, if the complaint is substantiated, referring the case to the appropriate Alliance Partner for their action;
- Recommending appropriate action to be taken from the GEC toward the Person/Subject of Concern to the Senior Management Team.

Where the Safeguarding Lead is constrained by a Conflict of Interest, they must assign an alternative Investigation Supervisor from within the FM Safeguarding Team.

Investigators and observers

Ideally two investigators will work on every investigation. If only one investigator is available, the investigation manager should also appoint an independent observer to sit in on interviews and provide the investigator with feedback and support. Where an investigation is held and number of Alliance Partner staff members are PoCs/SoCs, the investigation team must be balanced and include members of each Alliance Partner within it. Where this would result in a large number of people taking part, Alliance Partners are to revolve as observers

during interviews. No more than three investigators should be in an investigation at any one time (2 investigators and 1 observer).

Responsibilities of investigators

Investigators are responsible for the day-to-day conduct of the investigation, as defined by the ToR. Normally, their responsibilities include:

- Developing the investigation plan;
- Assessing and making recommendations on safety and confidentiality in cooperation with the Investigation Supervisor if appropriate;
- Assessing protection risks, in cooperation with the Investigation Supervisor;
- Making recommendations on the work status of the Person of Concern for the duration of the investigation in concordance with labour law;
- Gathering and securing evidence;
- Making a finding on the evidence;
- Preparing and submitting the report;
- Making recommendations/observations on the policies and practices that may have enabled the safeguarding concern to occur;
- FCDO liaison regarding the progress of the case.

If a member of the investigation team has any previous direct knowledge of the complaint, they should inform the Investigation Supervisor immediately, and a decision should be made as to whether this would compromise the investigation, and if so what action needs to be taken. In this event, the investigator is likely to be removed from the investigation.

Investigation teams should also consider ensuring a gender balance on the team and when feasible race, ethnicity and language should be taken into consideration to ensure the best outcome for the investigation and the comfort of those who will be interviewed – in particular vulnerable witnesses.

Qualifications of investigators

At minimum, investigators must be:

- Professional – exercise sound judgement and exhibit skill;
- Responsible – trustworthy, dependable and personally accountable for the decisions they take throughout the investigation;
- Qualified – experienced in interviewing and (at least) trained in *safeguarding* investigations;
- Independent – have no material personal or professional interest in the outcome of the complaint and no personal or professional connection with any witnesses, the complainant, or Person of Concern.

Additional expertise

Where investigators identify an additional need, such as working with child survivors, language barriers, legal concerns or interviewing people with communication disabilities – the investigation team is to inform the Investigation Supervisor immediately and additional expert advice found or resourcing sought.

5.2.3 Securing Evidence

Physical

Physical evidence should be collected, photographed, photocopied and/or described in detail. Investigators should conduct a site visit soon after receiving the complaint as part of the investigation and photograph any relevant objects, locations or items.

To prevent tampering with documents or records, investigators should work with Alliance Partners to:

- Secure the Person of Concern's office computer or laptop;
- Back-up their hard-drive;
- Remove, for the duration of the investigation, all data storage that they have used and that belong to the organisation;
- Obtain office records such as financial records, payment vouchers, contracts and individual case files;
- Obtain all official telephone records, including mobile phone records;
- Obtain official records (car logbooks, warehouse records, etc.);
- Place records in a secure environment such as a password protected folder or document, with access limited to the investigation team.

The above list is a guide and some actions may be more relevant than others depending on the case. This course of action is most likely to occur where the allegations concern SEAH and breaches of child safeguarding policy.

Medical evidence

It is very rare to use medical evidence in investigations. It is more common for the initial contact person to note any obvious signs of abuse when they first meet a witness and to record these details in the file.

5.2.4 Criminal vs Safeguarding Investigations

The main goal of the investigation is to find if an allegation is substantiated or unsubstantiated. The investigators are not prosecutors. Evidence should be gathered and a decision made on the balance of probability. An administrative investigation does not adhere to the same standards as a criminal investigation.

The investigation should focus on the allegations made and the Person of Concern should be treated with respect and afforded the right of response. Investigators must not pass judgment on the behaviour of the victims/survivors, witnesses or Person of Concern throughout the investigation. Investigations should be conducted with due consideration and sensitivity to the culture and customs of all involved.

A sample Terms of Reference for an investigation can be found within the [Annex of this policy](#).

5.2.5 Malicious complaints

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.

5.2.6 Timelines

- Report to FCDO within 24 hours of receiving a complaint;
- Complainant receives formal confirmation within 5 working days (if not sooner);
- Survivor/victim assistance and referral provided within 24 hours of receiving complaint;
- ToR and investigation team assembled within 1 week of complaint being received;
- Investigation completed and report submitted within 1 month of complaint being received.

5.2.7 Actions following substantiated reports

If a Child Safeguarding, PSEAH or PSEAH at work 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 immediately cease engagement on the GEC. The Alliance Partner will follow their own HR practices and procedures.

Where a bullying and harassment concern is substantiated, the FM Senior Management Team and the appropriate Alliance Partner should decide on actions to be taken in conjunction with Alliance Partner HR and the Fund Manager Safeguarding Lead. However, where the bullying and harassment is ongoing, presents a significant risk to the safety and wellbeing of the alleged victims/survivors or others, and where the bullying and harassment is targeted towards a person based on a protected characteristic (in accordance with the 2010 Equalities Act, UK), removal from engagement on the GEC will be considered. Again, the Alliance Partner will follow their own HR practices and procedures.

For further information regarding complaints handling, please see the flow diagram in [Annex 6](#).

6. Fund Recipient Safeguarding

6.1 Guidelines for Reporting

The SHE system is an online incident reporting platform used to report and track progress on Safeguarding Concerns reported to the FM from Fund Recipients. It is also used for similar purposes for finance concerns and security concerns.

The full guideline for how to use the online system has been shared with all FM partners.

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 within [Annex 12](#). Further details on the safeguarding requirements for Fund Recipients can also be found within the Fund Recipient Handbook.

FM staff members who wish to raise a safeguarding concern may do so by reporting to the GEC's Safeguarding Lead, danielle.spencer@girlseducationchallenge.org and/or uk_gec_pmo@pwc.com. You may report using the reporting form in [Annex 6](#).

6.2 FM handling of whistleblowing about Fund Recipients

In general, all whistleblowing signals received through the FM's designated email address or other means are referred immediately to the Risk Management Lead in order that initial related communications are streamlined, handled sensitively, confidentially and on a need-to-know basis, whatever the category and nature of the report.

In cases where the report is a safeguarding concern or includes a safeguarding component relating to a Fund Recipient personnel or operations, the Safeguarding Lead is also to be informed immediately (unless the complaint was initially made to them). Whistleblowing reports may be received verbally or in written form. Where received verbally, the details of the complaint should be written down by the person receiving the complaint and details shared with the FM Safeguarding Lead. Wherever possible, contact details for the whistleblower should be collected, but they should be placed under no obligation or pressure to provide these.

Following the receipt of a safeguarding-related whistleblowing report, the following immediate steps should be taken:

- The Safeguarding Lead will communicate with the whistleblower to confirm receipt of the complaint and to conduct a risk assessment with them. A whistleblower has the right to remain anonymous, and anonymous complaints will be treated as seriously as those sent without anonymity. Protecting a whistleblower's identity may mean that the handling of the case requires limited sharing of the complaint with the Fund Recipient, or that individuals within the Fund Recipient are precluded from receiving information. The FM should seek permission from the whistleblower before revealing any identifying information to the Fund Recipient. Where the whistleblowing report also contains allegations related to matters other than safeguarding (e.g. Fraud, HR policy, DNH), the Safeguarding Lead and Risk Management Lead will agree an initial communication strategy for the whistleblower that encompasses the follow-up needs for all aspects and avoids duplication of enquiries.
- The Fund Recipient has the ultimate responsibility to handle the case and this should be reinforced with the Fund Recipient when they are informed about the allegations made. However, the FM notes that use of external whistleblowing reporting mechanisms are indicative of lack of trust and safety with the Fund Recipient's internal reporting and investigation capacity. The FM will therefore work closely with the Fund Recipient to support a safe and transparent approach to handling the case. The FM also notes that the type, nature, size and location of the Fund Recipient organisation, may also affect its capacity to conduct a sufficiently impartial and effective investigation which means that different investigation approaches and resources may need to be considered.
- Where a case involves criminal activity, it will be reported to the relevant legal authority within 48 hours (where safe to do so).
- Where the safeguarding allegations made meet the threshold for reporting to FCDO, this will be conducted within 24 hours of the report being received. As with all safeguarding incidents this will be actioned by the Safeguarding Team. Where the

allegations include matters that are not safeguarding related, the Risk Management Lead will make sure that those are reported to FCDO, where procedures require and within the expected timeframes. FCDO will be advised if there is a linkage between the reports in different categories.

As with all safeguarding reports, the case will be logged on SHE. Once the partner is informed about the report, and where it is safe to do so, it will be logged under the Fund Recipient's organisation within the SHE system. This means that communication on the case should be recorded with the SHE system only. Emails regarding the case should additionally be stored on the SHE system under 'attachments', but email communication should be avoided in favour of communicating via SHE in order to maintain case handling audit trail, transparency in FM handling and to manage confidentiality issues.

In some cases, it may be a risk to log the case under the name of the Fund Recipient on SHE as the individuals with access to the system may have a conflict of interest or may be implicated in the complaint. Here it should be recorded as a 'GEC' level case and progress, actions and updates added here. All email communication should be recorded within SHE and actions assigned to individuals within the FM should be done via SHE. This allows for the Safeguarding Lead to be able to track activity on the handling of the case and to effectively manage the whistleblowing case.

All guiding principles of case management listed within section 5 of this policy should be followed. A whistleblowing complaint received should be logged on SHE as a GEC complaint to avoid accidental breach of confidentiality.

Where whistleblowing complaints contain allegations, which refer to multiple forms of policy breach (safeguarding, HR, DNH, fraud etc). the principles outlined within this policy should still be adhered to, but the follow-up and ongoing management of these cases will be conducted in concert with other relevant teams in Operations, DNH and Finance, using the Risk Management Lead as a coordination point where this is helpful.

Annex 1: Declaration

Declaration

I _____ fully understand and agree to abide by the attached Code of Conduct and the GEC's Safeguarding Policy, including all annexes. I understand that any breaches of the Code of Conduct and Policy will result in appropriate action being taken in accordance with the relevant policies and procedures of the GEC and my contracting company.

☐ I have read all safeguarding policies and 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 on the GEC, and in particular work with children, adults-at-risk and women.

☐ I agree to report to the GEC Safeguarding Lead, or the whistleblowing email any inappropriate behaviour, causes for concern or breaches of the code of conduct and policy that witness or which are shared with me via any means of communication.

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

If you have a safeguarding concern involving a GEC fund recipient please contact the GEC's Safeguarding Lead, danielle.spencer@girlseducationchallenge.org and/or uk_gec_pmo@pwc.com

Signature: _____

Date: _____

Annex 2: Reporting format

You may use these forms to note your concerns about a safeguarding concern occurring within a Fund Recipient and a breach of this Safeguarding Policy. This should be sent to uk_gec_pmo@pwc.com. You may also inform or report to the Safeguarding Lead (danielle.spencer@girlseducationchallenge.org). The form does not have to be used and reports will be accepted no matter what format they are submitted in. When the report is received, you may be sent this form to complete so that appropriate information can be gathered.

Num	Question	Response
1	Name and contact details of complainant? (confirm consent to be used within reports, or if preference to remain anonymous)	
2	In your own words, describe the nature of concern/allegation?	
Answer if the complainant is the alleged survivor/victim		
	If you are the survivor/victim of this allegation, please indicate whether you have received support services and whether you would like to receive information regarding referrals.	
	If you are the survivor/victim of this allegation, please be aware that we may need to disclose your report to your contracting Alliance Partner. Please indicate if you would prefer to remain anonymous.	
Answer if the complainant is not the alleged survivor/victim		
3	If you are not the survivor/victim, please indicate here any observations made by you (e.g. survivor(s)/victim(s) emotional state, any physical evidence)?	

4	How did you come to have a concern: was abuse observed or suspected? Was an allegation made? Was a disclosure made?	
	If the alleged survivor/victim reported the incident to you directly, please write down exactly what they said and what you said:	
Information regarding the Person of Concern		
5	Does the Person of Concern work for the Fund Manager?	
6	If yes, what is their name and position within the Fund Manager?	
7	Is the Person of Concern a member of staff or associated personnel within a project?	

8	If yes, what is their name and position within the project?	
Other information		
9	Date safeguarding incident/issue first reported?	
10	Date Safeguarding incident/issue occurred?	
11	Gender of Survivor(s)/Victim(s)?	
12	Age of Survivor(s)/Victim(s) (if they are a child)?	
13	Do the Survivor(s)/Victim(s) experience other forms of inequality? If so, what might those be?	
14	Are survivor(s)/victim(s) beneficiaries, staff members, volunteers or community members?	
15	Country where the incident/cause for concern took place?	
16	Region where the incident/cause for concern took place?	
17	Are there additional risks to the survivor(s)/victim(s) health, safety or wellbeing?	
18	If 'yes', what are these risks, and in what way have you mitigated against them? If 'no' please elaborate if you can.	

19	Does the incident/issue present a risk to the health, safety or wellbeing of other people?	
20	If 'yes', what are these risks, and in what way have you mitigated against them? If 'no' or 'unknown' please elaborate if you can.	
21	If 'yes', who is at risk	
22	Address if known. If address is not known, how can we find the survivor(s)/victim(s)?	
23	In your opinion, would it be safe to contact the survivor(s)/victim(s)?	
24	Is there any other relevant information we should be aware of?	
25	<p>Have you reported the incident to anyone else? If yes, please specify:</p> <ul style="list-style-type: none"> - 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 survivor/victim)? 	
26	Please add any other relevant information below about yourself or the concern you are raising that has not been covered in the previous questions.	
27	As a complainant do you feel safe? How could we help you to feel safer?	

Annex 3: 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).

- | | |
|------------------------|--|
| Safeguarding | 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. |
| Whistleblowing | 2. All organisations must have a separate child safeguarding policy which address all forms of sexual, physical and emotional violence towards children.
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. |
| Human resources | 4. A clear <u>handling framework</u> , to respond appropriately to all concerns and support the survivor of violence must also be in place.
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. |
| Risk management | 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.
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>Fund Recipient, 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.

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, men, 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 are able to 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, they ensure their initial designs respond to the needs of children and show 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 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 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 4: 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/victim 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.¹⁵
- 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 Risk and Mobilisation 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.
- Keep romantic and/or sexual relationships with other staff members secret from the FM. Relationships must be declared as soon as possible to their line managers and the Risk and Mobilisation 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.

¹⁵ Informed consent: permission granted in full knowledge of the possible consequences.

The GEC GEC's Bullying and Harassment Statement, within the GEC's Safeguarding 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.
- Repeatedly assign tasks or deadlines which are impossible to meet or inappropriate for the scope or seniority of their role in a way that is likely to undermine an individual's morale or sense of professional self-worth.
- Copy (Cc) emails that are critical about someone to others, who do not need to know or use blind copy (Bcc) on emails in a similar way.
- Make threats or comments about job security without foundation.
- Repeatedly change workplace arrangements to inconvenience a particular employee.
- Repeatedly, excessively scrutinise a person's work over and above the scrutiny applied to others' work.
- Spread malicious rumour.
- Cyber-bully.

Annex 5: Consent form for staff/contractors commissioning photography

The Girls' Education Challenge Fund (GEC) Alliance supports organisations and private companies to find better ways to provide education opportunities to marginalised girls in the poorest countries in Africa and Asia. We would like to *take photographs / *make a video recording of your *child / *children for promotional purposes. These images may appear in our printed publications, in the media, on video, on our website, on social media or on all five. (*Please delete as appropriate.)

The GEC Alliance subscribe to the following conditions of use:

- This form is valid for two years from the date of signing. The consent will automatically expire after this time.
- We will not re-use any images after this time.
- We will not include full names (which means first name and surname) of any child or adult in an image on video, on our website, or in printed publications. We will also not include personal identifying information such as e-mail or postal addresses, or telephone numbers or details of location such as school name or name of village – we will refer to District or name of large town/city - on video or on our website or in printed publications.
- If we use images of individual children, we will not use the name of that child in the accompanying text or photo caption.
- We will only use images of children who are dressed, to reduce the risk of such images being used inappropriately.

By signing/finger printing below you freely give your consent to be filmed/photographed/radio interviewed (delete as appropriate) and you also give consent to the GEC Alliance to use these photos/footage/story in all the ways specified above.

Working with adults and emancipated adolescents (over the age of 15, but do not have a parent/caregiver)

Name

I confirm that someone has explained this form to me and that I understand what it means. I understand that the image/footage may be used in printed publications, in the media, on video, on our website on social media, or on all five (delete where appropriate)

.....

Signature/finger-print of person in photo/footage date

I (insert name of child) confirms that I am an emancipated adolescent (over the age of 15, but do not have a parent/carer) someone has explained this form to me and that I understand what it means. I understand that the image/footage may be used in printed publications, in the media, on video, on our website on social media, or on all five (delete where appropriate)

.....

Signature/finger print of child in photo/footage date

If the working with children

Name of the child's parent/carer

Address of child's parent/carer

I (insert name of child's parent) confirms that I have read/someone has explained the purpose of this form. I understand that the image/footage may be used in printed publications, in the media, on video, on our website, or on all four.

.....

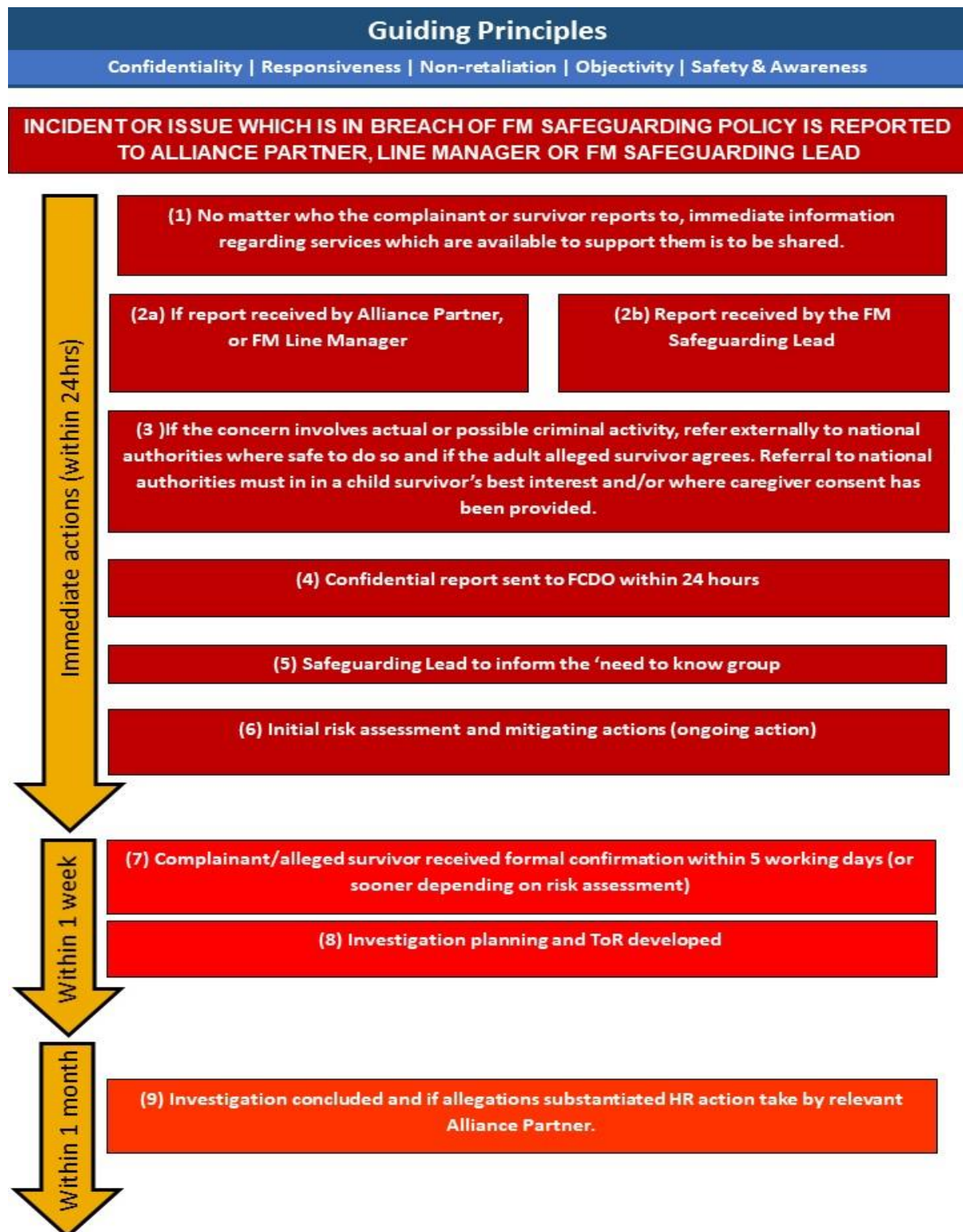
Signature/fingerprint of child's parent/carer date

Please return the completed form to Clare 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 Clare Convey on the above e-mail address.

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.



Annex 7: 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, PricewaterhouseCoopers (PwC), Nathan Associates, Social Development Direct (SDDirect) and Cambridge Education.

Beneficiary: An individual who receives direct 'benefit' through the GEC's programming – this may be resources, services, training, education or any other benefit.

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 or the circumstances in which it is carried out, is 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/victim 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.¹⁶

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.

Person(s) of Concern/Subject(s) of Concern: The individual or group of individuals who have been accused of wrongdoing. These terms are used interchangeably.

¹⁶ OCHA, UNHCR, IRC [The GBV IMS, GBV Classification Tool](#), 2006.

Safeguarding: Preventing and responding to harm caused by violence, 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. **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 Fund Manager's (FM) 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 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.

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 potential wrongdoing or actual wrongdoing which they feel is in the public interest.

Annex 8: Risk Assessment Tool

	Risk	Likelihood	Impact	Risk mitigation	Owner
1	Risk that victims/survivors are negatively impacted by the process of investigation e.g. stigma, bullying, losing their job			•	
2	Risk to complainant/whistleblower of their identity becoming known			•	
3	Risk of retaliation against PoC/SoC by staff/community			•	
4	Risk that breaches of conduct are found to extend beyond the current allegations			•	
5	Risk of abuse or harassment to vulnerable populations by subject of complaint			•	
6	Reputational risk to agency			•	
7	Risk of information leaking			•	
8	Risk of subject of complainant contacting witnesses/others involved in the investigation			•	
9	Risk that survivor/s do not wish to engage with the investigation			•	
10	Other risk to the survivor/victim or the Person of Concern/Subject of Concern			•	

Annex 9: Investigation Terms of Reference Template

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1. Case Reference Number:

2. Safeguarding concern or incident and background:

Brief description of the alleged safeguarding incident or concern, the location, the environment and other relevant information that may support the investigation

3. Objectives and purpose of the investigation

The investigation to be conducted remains within the scope of the reported incident above and others that may come to light during the investigation.

The objectives of this investigation are the following:

- *To interview relevant parties with regard to the allegation.*
- *To state the facts and findings related to the allegation.*
- *To prove or disprove the allegations.*
- *To make recommendations on how to protect the survivors and other potential survivors if the allegations are substantiated.*
- *To make recommendations on sanctions for perpetrators where allegations are substantiated in line with the FM code of conduct, FM safeguarding policy and the contracting Alliance Partners policies.*
- *To consider and make recommendations regarding any further safeguarding allegations or concerns that may arise during the investigation and their actual or possible harm.*

4. Investigating team

Specify the names and titles of the investigating team members (starting with the leading investigator) as well as their roles and responsibilities.

5. Scope of the investigation

The investigation strives to find answers to the following questions:

- *Who is/are the survivors?*
- *Who are the witnesses, if any?*
- *Who is/are the alleged perpetrators?*
- *What exactly happened?*
- *When and where did it happen?*
- *Who was present?*
- *How did it happen?*

¹⁷ Slightly adapted from the Keeping Children Safe, Management of Child Safeguarding Allegations

- *Who did, said and/or reported what? And to whom?*
- *Why did it happen?*
- *Could it have been avoided?*
- *Is there any documentary evidence?*
- *Who else may have relevant information?*
- *What sanctions or actions were taken or are to be taken towards the perpetrators?*

6. Conducting the investigation – methodology

The methodology for the investigation is defined by the investigation team. However, any investigation needs to cover the following:

- *Review any existing documentation about the case.*
- *Visit the venue where the allegations took place and study the environment.*
- *Discuss and interview relevant stakeholders.*

7. Investigation findings and report

The investigation team provides a report no later than one week after the end of the investigation. The report includes all investigation findings, as well as recommendations for actions to protect survivors, witnesses, the SoC and the GEC. The finding of the investigation and the report itself are shared with the line manager who commissioned the investigation for his or her feedback.

8. Submission of the final investigation report

The investigation report I submitted in hard copies and duly signed by every member of the investigation team. The investigation team presents the final report in a (virtual) meeting to the commissioner of the investigation (the GEC 'need-to-know group').

9. Implementation of actions

The GEC FM is responsible for implementing an action plan which is based on the recommendations and findings of the investigation report.

The action plan includes measures and actions addressing the findings of the safeguarding investigation, timelines and responsibilities of co-workers. The implementation of the action plan is regularly monitored by the FM Safeguarding Lead and Safeguarding Team.

10. Resources

Once the Terms of Reference are shared with the investigation team, each member needs to determine the resources they require. Resources should be made available immediately by the FM. The Safeguarding Lead will ensure that budget is in place should there be a need for additional resources and work directly with the Fund Lead on this.

11. Letter of authority

A letter of authority is to be provided to the investigation team and signed by the Fund Lead. This should be provided in the Annex of the ToR. A sample letter for the most serious safeguarding abuses is provided below.

Letter of authority

The GEC has commissioned an investigation into safeguarding allegations. Their team have been appointed as investigators with regard to the above mentioned Safeguarding incident. To be able to carry out a thorough and professional investigation, the investigation team requires full access to all necessary information and individuals. The team has our full permission to demand sight of all HR/personnel files, all financial files and data and any other materials they consider relevant to their enquiries. We consider nothing and no-one off limits to this investigation.

Please be advised that anyone who fails to cooperate with the requests or demands of the investigation team, appears to be interfering with or obstructing the investigation, attempts to - before or after the investigation - intimidate or harass anyone who participates, reports or testifies in the investigation will be reported to us, and such actions may result in disciplinary action. We reassure you that your cooperation with the investigation team will not result in any negative impact for you. On the contrary, it is your duty to cooperate with the investigation team and provide whatever information you have that could assist the team with their enquiries.

Yours truly,

Annex 10: Investigation Report Template

Findings of the Investigation¹⁸

Guidance: complete the section of the report on “Findings”, SOC per SOC (you can have more than 1 SOC) and allegation per allegation (you can have more than one allegation per SOC).

SOC1: xxxx

Allegation 1: xxxx

Guidance: State the allegation clearly and the section/articles of the policy or SG Bulletin 2003 that are breached (ex:” SOC1 is alleged to have sex with vulnerable women in the community in exchange of getting a job, in breach of section 3.2 c. of the SG UN Bulletin 2003”)

Elements that tend to, or do not tend to, substantiate the allegation:

List the key elements that substantiate the allegation. It can be statement/quotes from witnesses, elements of the reviewed documents, a sms, an email, an extract of a log book, photos, a plan of the office/building etc...). Be very specific, precise, with names, dates, numbers etc... Don't refer to rumors as element that can substantiate. Reflect all testimonies including the testimony of the SOC1. Annexes of the report would document all relevant elements/evidences.

Elements to substantiate the allegation 1	Elements not to substantiate the allegation 1
<ul style="list-style-type: none">Ex: All witnesses stated the same behavior pattern that the SOC1 offer women a job if they have sex with him.	<ul style="list-style-type: none">Ex: SOC1 denies all allegations
<ul style="list-style-type: none">Ex: SOC1 sent a SMS to one in women in the community which says “.....”	<ul style="list-style-type: none">Ex: testimony of W1 contradicts with testimony of W2
<ul style="list-style-type: none">Ex: The witness W2 stated that she saw one incentive worker being naked with SOC1 in the back room of the office	
<ul style="list-style-type: none">The logbook shows that SOC1 had traveled to the camp on the same date	

¹⁸ This template is taken from CHS investigation tools

Summary of the process:

In this section, you describe the thought process you have followed to conclude on the allegation. You balance the elements to substantiate with the elements not to substantiate following some criteria that could be the number of witnesses stating the same thing, the credibility of the witnesses, the objectivity of the evidences (if you have a picture for example or if you have a sms or an email), how testimonies corroborate between each other or other sources of information you have (ex: a logbook or a registration book). You can also consider the relations between the witnesses if you have information about that (if there are protective to each other or the contrary).

XXXXXXXXXXXXX

XXXXXXXXXXXXX

XXXXXXXXXXXXX

Conclusion:

For each allegation, you have to come up with a conclusion. The conclusion cannot be that there is a need for additional investigations but is one the three following options.

- Allegation 1 is substantiated based on sufficient evidence
- Allegation 1 is not substantiated due to insufficient or unclear evidence
- Allegation 1 is not substantiated based on evidence to clear the subject of complaint or to establish a malicious complaint

Allegation 2: xxxx

Elements that tend to, or do not tend to, substantiate the allegation:

Elements to substantiate the allegation 2	Elements not to substantiate the allegation 2
•	•
•	•
•	

Summary of the process:

Conclusion:

Etc.

Annex 12: Safeguarding concern categories for Fund Recipients

Cat. #	Definition	Reporting lines	Immediate Actions (FM) *please keep in mind that further information may not be available, particularly where complainant is anonymous	Responsibility for Case Handling
2 - Safeguarding policy breach	<p>Concerns involving Fund Recipients (lead partners, consortium partners, implementing partners) staff, contractors or volunteers as an alleged or potential PoC.</p> <p>This includes breaches of all safeguarding policies and codes of conduct (e.g., Child Safeguarding, SEAH, Bullying, Harassment). Safeguarding breaches in this concern category should be reported whether the alleged victim/survivor</p>	<p>Projects report via SHE - through this the PM, Safeguarding Lead and Risk and Mobilisation Lead are alerted to report.</p> <p>Others (complainant or whistleblower) may raise a concern using: uk_gec_pmo@pwc.com or by writing directly to the safeguarding lead (danielle.spencer@girlseducationchallenge.org). All safeguarding-related emails are to sent to the Safeguarding Lead by the PMO.</p>	<p>SG Team responds within 24hours via SHE, asking the project to complete part 1 of appropriate form within 24 hours with as much information as possible. SG Team asks project for further information on the immediate safety of the victim/survivor and ensures that they have received assistance as a priority - if project has not already provided this information.</p> <p>SG Team marks case category as '2' in the system.</p> <p>PMO to report to FCDO within 24 hours and:</p>	Project

	r is a member of staff, beneficiary, or community member.		<ul style="list-style-type: none"> - log case and FCDO case number on the tracker and SHE - ensure case categorisation is marked correctly on SHE - provide backstop for PM if they are not available 	
3 – Higher-level duty of care protection incident	<p>Protection incident reported:</p> <p>(a) Involving (as a PoC) 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.</p> <p>(b) Occurring within non-formal 'partner' schools or in other non-formal 'partner' institutions;</p> <p>(c) Occurring on the way to school/activity</p> <p>(d) High-risk beneficiary child-to-child violence</p> <p>Projects should report</p>	<p>Projects report via SHE - through this the PM, Safeguarding Lead and Risk and Mobilisation Lead are alerted to report.</p> <p>Others (complainant or whistleblower) may raise a concern using: uk_gec_pmo@pwc.com or by writing directly to the safeguarding lead (danielle.spencer@girlseducationchallenge.org). All safeguarding-related emails are to sent to the Safeguarding Lead by the PMO.</p>	<p>SG Team respond within 24hours via SHE, asking the project to complete form 1 within 24 hours with as much information as possible. PM asks project for further information on the immediate safety of the victim/survivor and ensures that they have received assistance as a priority - if project has not already provided this information.</p> <p>SG Team marks case category as '3' in the system</p> <p>If case is deemed to be high risk during FM triage (severe risk to person, project and/or reputation) PMO to report to FCDO within 24 hours and:</p>	<p>Outside of project's immediate responsibility (as the PoC is not employed by the project), so project should not take on case handling. However, projects should have influence over investigation process and/or influence over lessons learnt and</p>

	<p>cases of:</p> <ul style="list-style-type: none"> - Sexual violence reported to them in partner schools - 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'. Projects can report cases of (but don't have to): - Emotional and verbal abuse. - Bullying. 		<ul style="list-style-type: none"> - log case and FCDO case number on the tracker and SHE - ensure case categorisation is marked correctly on SHE - provide backstop for PM if they are not available 	<p>actions which follow. Projects must ensure safety of the complainant and/or victim/survivor and facilitate access to services if the responsible actor has not already done so.</p> <p>Projects should be monitored and an increase in 'discovery' methods employed by projects in cases of high-risk.</p>
4 (Design or implement	A situation where the	Projects report via SHE - PM, Projects report via SHE - through	SG Team respond within	Project

<p>ation problem/D NH)</p>	<p>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</p>	<p>this the PM, Safeguarding Lead and Risk and Mobilisation Lead are alerted to report.</p> <p>Others (complainant or whistleblower) may raise a concern using: uk_gec_pmo@pwc.com or by writing directly to the safeguarding lead (danielle.spencer@girlseducationchallenge.org). All safeguarding-related emails are to sent to the Safeguarding Lead by the PMO.</p>	<p>24 hours via SHE. PM asks project for further information on the immediate safety of the victim/survivor and ensures that they have received assistance as a priority - if project has not already provided this information.</p> <p>SG Team marks case category as '4'.</p> <p>If case is deemed to be high risk during FM triage (severe risk to person, project and/or reputation) PMO to report to FCDO within 24 hours and:</p> <ul style="list-style-type: none"> - log case and FCDO case number on the tracker and SHE - ensure case categorisation is marked correctly on SHE - provide backstop for PM if they are not available 	
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	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.			
5 – Health and Safety concern	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>Projects report via SHE - through this the PM, Safeguarding Lead and Risk and Mobilisation Lead are alerted to report.</p> <p>Others (complainant or whistleblower) may raise a concern using: uk_gec_pmo@pwc.com or by writing directly to the safeguarding lead (danielle.spencer@girlseducationchallenge.org). All safeguarding-related emails are to sent to the Safeguarding Lead by the PMO.</p>	<p>SG Team respond within 24 hours via SHE. PM asks project for further information on the immediate safety of the victim/survivor and ensures that they have received assistance as a priority - if project has not already provided this information.</p> <p>SG Team marks case category as '5'.</p> <p>If case is deemed to be high risk during FM triage (severe risk to person, project and/or</p>	Project

			<p>reputation) PMO to report to FCDO within 24 hours and:</p> <ul style="list-style-type: none"> - log case and FCDO case number on the tracker and SHE - ensure case categorisation is marked correctly on SHE - provide backstop for PM if they are not available 	
6 - Contextual Safeguarding Concerns	<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</p>	<p>Projects report via SHE - through this the PM, Safeguarding Lead and Risk and Mobilisation Lead are alerted to report.</p> <p>Others (complainant or whistleblower) may raise a concern using: uk_gec_pmo@pwc.com or by writing directly to the safeguarding lead (danielle.spencer@girlseducationchallenge.org). All safeguarding-related emails are to sent to the Safeguarding Lead by the PMO.</p>	<p>SG Team respond within 24 hours via SHE. PM asks project for further information on the immediate safety of the victim/survivor and ensures that they have received assistance as a priority - if project has not already provided this information.</p> <p>SG Team marks case category as '6'.</p> <p>If case is deemed to be high risk during FM triage (severe risk to person, project and/or reputation) PMO to report to FCDO within 24 hours and:</p> <ul style="list-style-type: none"> - log case and FCDO case number on the 	Project

	<p>survivor/victim does not disclose directly. Where a school or facility is named in the contextual safeguarding concern where there are staff members, volunteers or associated personnel employed by the GEC project, this concern should be categorised as a Cat 2 and that process applied.</p>		<p>tracker and SHE</p> <ul style="list-style-type: none"> - ensure case categorisation is marked correctly on SHE - provide backstop for PM if they are not available 	
<p>7 – Gender-based Violence, Child Protection or broader protection issues</p>	<p>General GBV and Child Abuse cases where victims/survivors are women, men, boys or girls taking part in our 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</p>	<p>Projects report via SHE - PM, Safeguarding Lead and Risk and Mobilisation Lead are alerted to report.</p>	<p>SG Team respond within 24 hours via SHE. PM asks project for further information on the immediate safety of the victim/survivor and ensures that they have received assistance as a priority - if project has not already provided this information.</p> <p>SG Team marks case category as '7'.</p> <p>If case is deemed to be high risk during FM triage</p>	<p>General GBV and Child Abuse cases - project does not have responsibility to investigate - although victim/survivor assistance should be assured as</p>

	<p>appropriate referrals are in place). Projects 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. Projects 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 projects in these instances.</p>		<p>(severe risk to person, project and/or reputation) PMO to report to FCDO within 24 hours and:</p> <ul style="list-style-type: none"> - log case and FCDO case number on the tracker and SHE - ensure case categorisation is marked correctly on SHE - provide backstop for PM if they are not available 	<p>should referral to appropriate and safe child protection/GBV actors.</p>
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