



Protection is possible

How an innovative operating model strengthened safeguarding for the Girls' Education Challenge

Girls'
Education
Challenge



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List of abbreviations

FCDO	Foreign, Commonwealth and Development Office
GBV	Gender-based violence
GEC	Girls' Education Challenge
GESI	Gender equality and social inclusion
INGO	International non-governmental organisation
IRC	International Rescue Committee
LMIC	Low and medium-income country
NGO	Non-governmental organisation
Ofsted	Office for Standards in Education, Children's Services and Skills
PIM	Performance improvement measure
PIN	People in Need
SGAP	Safeguarding Action Plan
SEA	Sexual exploitation and abuse
SEAH	Sexual exploitation and abuse and sexual harassment

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Our appreciation goes to all Girls' Education Challenge implementing partners.



Executive summary



Executive summary

The Girls' Education Challenge (GEC) was launched in 2012 as a 12-year commitment to reach the most marginalised girls in the world. Working across 41 projects delivered by over 30 implementing partners in 17 countries, the GEC is the largest global fund dedicated to girls' education.

The GEC has radically reformed its approach to safeguarding over the last three years, in line with the UK government's [new safeguarding policies, launched in 2018](#).

From early 2019, the GEC Safeguarding Team¹ set about developing and then implementing a new approach to safeguarding. As part of this new approach, the GEC launched a new Safeguarding Operating Model that is designed to help implementing partners meet the GEC 14 Minimum Standards for safeguarding. We deliberately moved away from a self-audited process with a traditional focus on compliance. Instead, we favoured an independent approach based on constant review, reflection and support. Our aim is always to increase the quality and implementation of safeguarding policies, practices and procedures, and strengthen safeguarding cultures within the GEC partner organisations.

THE FCDO AND GEC MINIMUM STANDARDS FOR SAFEGUARDING

The GEC 14 Minimum Standards for safeguarding build on the [FCDO safeguarding standards](#). The additional dimension introduced by the GEC Safeguarding Minimum Standards is the integration of child safeguarding, bullying and harassment. The GEC follows central FCDO guidance on when projects have to meet the FCDO standards. FCDO Safeguarding Minimum Standards and therefore the GEC's Minimum Standards are based on the standards set out by the [Inter Agency Standing Committee, Keeping Children Safe](#) and the [Core Humanitarian Standards Alliance](#).

Despite being at different levels with regards to meeting the Minimum Standards in 2019, all GEC implementing partners have shown how the Safeguarding Operating Model can work on the ground to protect children and adults from violence, exploitation and abuse. This paper shares how the GEC and its implementing partners improved safeguarding standards together. In particular, the lessons learned from our recent experience provide valuable recommendations for the wider development sector – and beyond education.

Who is this paper for?

- The safeguarding approach described in this paper is particularly relevant for fund managers of organisations that have operations in multiple countries.
- Likewise for international NGOs and multilateral partners with multiple projects in their portfolios, the GEC's Safeguarding Operating Model can help in establishing or maintaining standards across a wide number of country offices and partners.

We deliberately moved away from a self-audited process with a traditional focus on compliance. Instead, we favoured an independent approach based on constant review, reflection and support.

¹ A central team, based within the GEC Fund Manager.

What is the GEC's Safeguarding Operating Model?

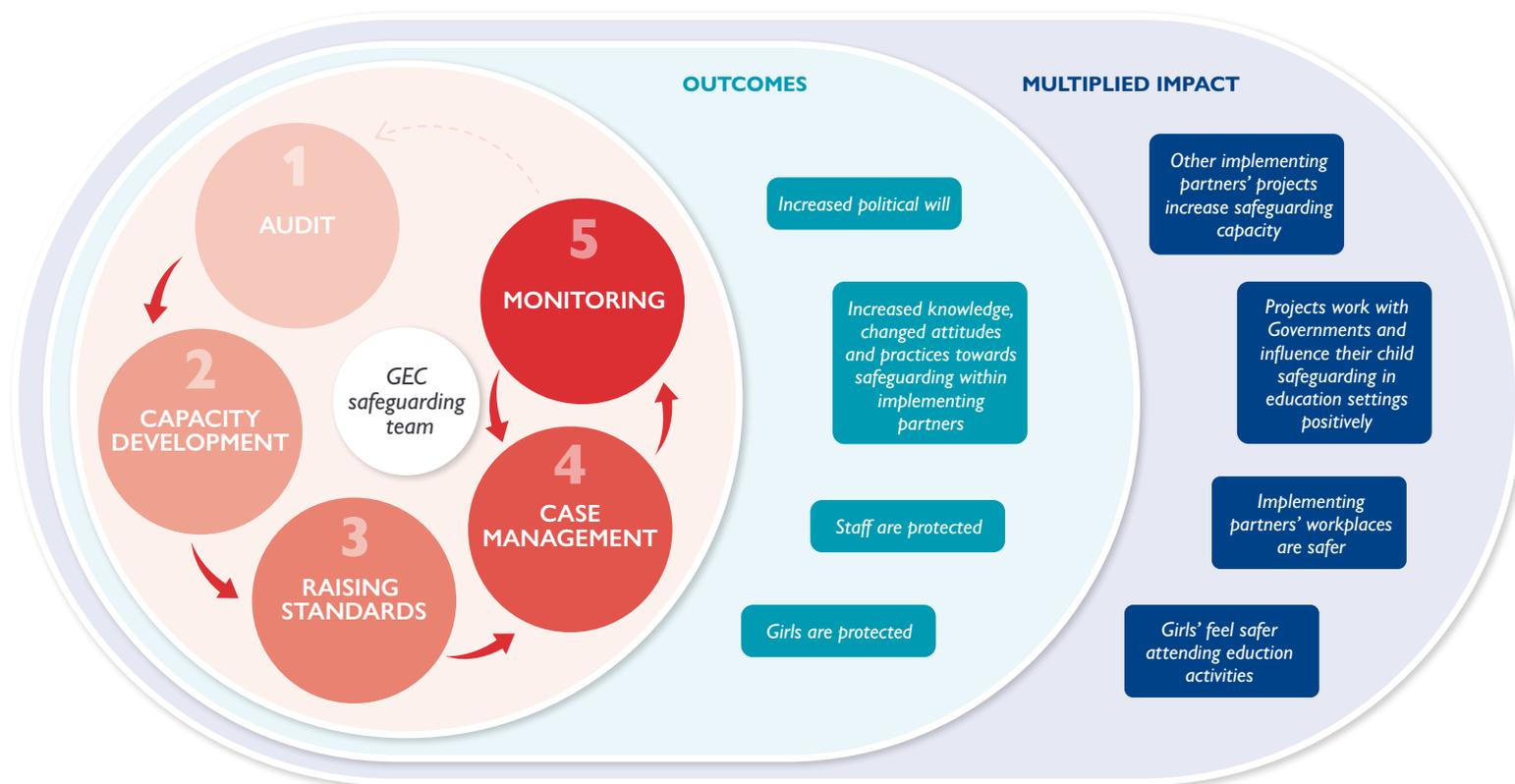
Safeguarding is the prevention of, mitigation of and response to violence, exploitation, abuse and harassment, which occurs due to structural and hierarchical power inequality and the abuse of that inequality by individuals or entities through action or inaction.

The GEC's Safeguarding Operating Model considers that five main areas of work will lead to strengthened political will and positive safeguarding cultures. These are: (1) Audit: support in achieving meaningful compliance for implementing partners with Safeguarding Action Plans, sharing resources and technical support; (2) Capacity development: training partners through one-to-one support and webinars; (3)

Mainstreaming across the GEC: mainstreaming standards across the wider programme; (4) Case management: support to improve case handling and use lessons learned to inform meaningful compliance; and (5) Monitoring: maintaining high standards on individual projects.

The overall goal of the model is that girls, project staff and others working with implementing partners are protected from the perpetration of violence, exploitation, abuse and harassment through comprehensive safeguarding within the GEC and beyond. The model aims to multiply impact through uptake of the model itself and the tools associated with it by actors external to the GEC or through other projects implemented by implementing partners.

Figure 1: The GEC's Safeguarding Operating Model



By the end of 2020, all GEC partners had successfully adopted a new, comprehensive approach to safeguarding.

Technical support and oversight by the GEC Safeguarding Team emphasised quality over a more traditional due diligence approach. Implementing partners were assessed on the content of their safeguarding policies, practices and procedures rather than simply having them in place. We refer to this as ‘meaningful compliance’. Implementing partners are now implementing the new safeguarding approach and demonstrating culture change within their day-to-day work.

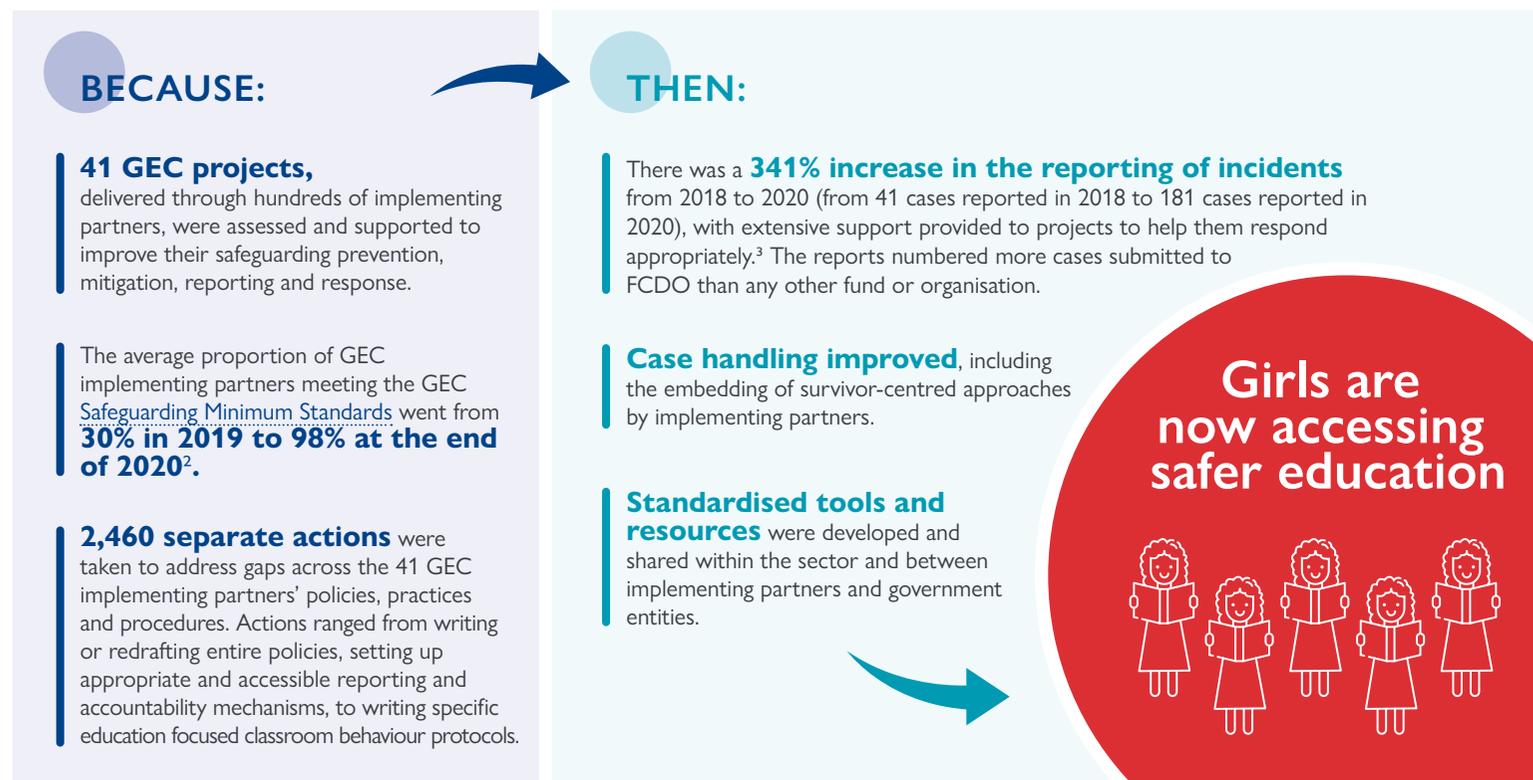
Overall, the GEC’s Safeguarding Operating Model led to greater prioritisation of safeguarding by implementing partners, more competent case handling

and, as a result, delivery of safer programming for girls and staff alike.

2020-21 has been one of the most challenging years for the GEC, with the implementing partners facing an unprecedented crisis as a result of COVID-19. The strong safeguarding foundations laid before 2020 enabled a safer and more effective COVID-19 response for the girls we support. When the COVID-19 pandemic started the GEC projects already had solid networks with girls and safeguarding reporting mechanisms were in place. Projects used their existing networks to ensure girls were safe. They adapted rapidly, ensuring materials (such as hygiene kits and learning materials) were distributed safely, and increased their communications with girls and their communities on safeguarding and protection.

The strong safeguarding foundations laid before 2020 enabled a safer and more effective COVID-19 response for the girls we support.

Figure 2: Key outcomes of the GEC’s Safeguarding Operating Model



² The way in which compliance is calculated is explored later in this paper. However, the remaining actions to be completed are smaller actions, which do not leave staff, girls or others at risk, and which we are continuing to work with implementing partners so that they may complete. It is notable that safeguarding is an ongoing activity and scoring may fluctuate as gaps are identified within implementing partners’ case management, or as partners adapt their programming.

³ It is important to note that the vast majority of cases reported were perpetrated by non-UK funded individuals.

MULTIPLIED IMPACT

As a result of aligning their policies and practices to the GEC's Safeguarding Operating Model, we have seen implementing partners changing or adding global policies, as well as shifts in understanding across organisations. Governments have adopted tools and approaches that will have a long-term effect on global, regional and national implementation of safeguarding frameworks, going well beyond the GEC itself. [Examples of multiplied impact include the adoption of one project's code of conduct within local government schools in Nigeria](#), as well as international impact through the ambitious plan to replicate the GEC Safeguarding Action Plan process globally by one of the GEC's implementing partners. Furthermore, there was a significant increase in reports that are received and therefore acted upon. This demonstrates that policies are being put into practice and that project staff, girls and others working with GEC implementing partners have trust in their case handling. Implementing partners also were able to respond quickly and effectively to the impact of COVID-19. Without the solid foundations put in place through meaningful compliance, they would have struggled to safely scale-up activities or work on higher-risk activities while maintaining protections.

What have we learned?

There are five key areas of learning from implementing the GEC's Safeguarding Operating Model.

1. Set the direction

- Put resources in place and plan how to address safeguarding needs as early in the project cycle as possible. The later they are put in place, the more difficult it is for projects to adapt.
- Rapid and meaningful improvement can be most effectively delivered where there is support and oversight of implementing partners, combined with active accountability.
- Pragmatic phasing of activities helped implementing partners to prioritise actions which had the most direct impact on the safety of girls and according to the risks involved. This meant that projects had a clear roadmap to reach their goals.

2. Work closely with implementing partners

- Provide a clear, step-by-step process as part of a Safeguarding Action Plan (implementing partners typically had around 60 actions to complete).
- To support implementing partners, provide written feedback on their policies, practices and procedures. Hold multiple one-to-one calls to sign-post existing resources within the safeguarding, child protection and gender-based violence (GBV) sectors, and jointly create new resources with implementing partners where none exist.
- Develop mutual trust. We used an approach based on appreciative inquiry⁴ to provide a supportive environment where implementing partners could progress and meet the GEC Safeguarding Minimum Standards.

3. Address common and urgent technical gaps⁵

- Many partners lacked policy in one or more areas (child safeguarding; safeguarding against sexual exploitation, abuse and harassment; bullying and harassment), or gaps within the policies themselves.
- Whistleblowing mechanisms, community-based reporting mechanisms and grievance mechanisms were not in place or were not accessible for girls (e.g. an email address was the only means of reporting).
- Mapping and trusted referral pathways had not been conducted appropriately by the majority of new projects. Without these risk assessments in place there is an increased risk of furthering harm to survivors.
- Implementing partners often lacked the right investigation skills, such as understanding the differences in approach to working with adult and child survivors. This was both a capacity and resourcing issue.
- Training materials were either inconsistent, focused on only one area of safeguarding, too short (many trainings were only an hour in length) or lacked the necessary level of detail.
- Implementing partners had not taken into account the different needs of the diverse groups of girls they were working with and the specific needs that working with those girls may present.
- There was an overall lack of seniority for safeguarding staff members. Where board members with specific responsibility for safeguarding were in place, they were often not trained specifically in their role and responsibilities.



⁴ For more information regarding Appreciative Inquiry see: Finegold, M., Holland, B. and Lingham, T., 2002. *Public Organization Review*, 2(3), pp.235-252; and Preskill, H., 2006. *Reframing evaluation through appreciative inquiry*. 1st ed. Sage Pubns Inc: Sage Publications, pp.1-34.

⁵ The analysis in this section reflects the situation prior to the more thorough GEC Safeguarding Operating Model being put in place. It mirrors the analysis of the sector at this time which has been written about extensively, including in the UK Parliamentary International Development Committee (IDC) Inquiry into Sexual Exploitation and Abuse. The most recent publication from the IDC on sexual exploitation and abuse highlights that there continues to be an issue regarding practically meeting minimum standards on safeguarding within the development sector.

- Many of the implementing partners had not safety-mapped schools or clubs to check that girls identified the route to travel as safe. Many had not safety-audited schools or other project sites. Many required support to deliver participatory monitoring work of safeguarding reporting mechanisms and general safety with girls.

4. Understand the barriers to progress

- Whilst the size of the organisation and resourcing were significant issues, we found that political will within implementing partners at project and organisational level were often the largest barriers.
- Some implementing partners explained that they were initially reluctant to engage in the process to meet the GEC standards. They felt frustrated that there were so many different processes that needed to be completed from different donors and fund managers.
- However, oversight and support through their Safeguarding Action Plan helped to soften this resistance, particularly as partners began to see changes in the safety of girls in their projects and see impact beyond the work of the GEC.
- Some projects reported that the strengthening of their policies, practices and procedures through the GEC meant that other due diligence processes were more easily completed and that they applied the standards across other projects as a result.

5. Build on early success

- Lessons learned through case management have to be integrated into implementing partners' Safeguarding Action Plans to ensure any gaps identified through case management are filled.
- Having solid foundations put in place through meaningful compliance meant that implementing partners were able to respond to the challenges posed by COVID-19 more appropriately.
- Overall, the absence of understanding of GBV, gender and social inclusion and child protection standards and best practice was found to be at the heart of many of the gaps in implementing partners' safeguarding policies, practices and procedures. This gap highlights that there is a significant need for inter-sectoral collaboration and learning between those working in or on safeguarding and those delivering GBV and child protection programming in communities.

What tools will help maintain progress?

Over the course of 2021, the GEC Safeguarding Team has developed and refined ways of working and tools, such as the [risk assessment](#) and [monitoring of safeguarding activities](#), to maintain the progress made by implementing partners through the implementation of the GEC's Safeguarding Operating Model. The risk assessments allow to prioritise projects for additional support and to provide feedback to the implementing partner through formal review. The monitoring is focused on quality, knowledge and culture – exploring with implementing partners whether or not policies are being put into practice in meaningful ways. The GEC Safeguarding Team will continue to work closely with implementing partners on case management and capacity development which go beyond the GEC Minimum Standards, but where there has been a real need demonstrated for support, such as on reaching girls with disabilities.

We have confidence that the GEC's Safeguarding Operating Model will increase accountability and ensure the Minimum Standards are meaningfully met on all high-risk projects.



What are the recommendations for the wider development sector?

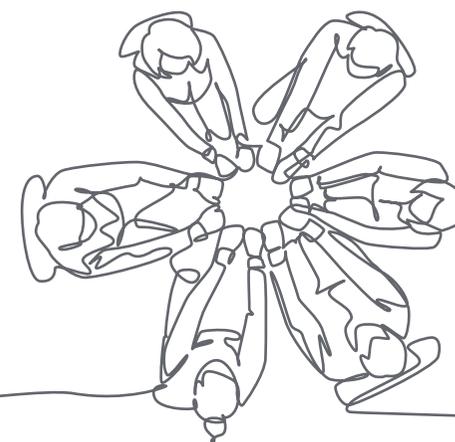
We have confidence that the GEC's Safeguarding Operating Model will increase accountability and ensure the Minimum Standards are meaningfully met on all high-risk projects. Aside from investing and applying these guidelines, we recommend the following:

1. Move beyond compliance:

- Listen to those at risk, particularly women and girls.
- Focus on meaningful compliance and on quality rather than on a more traditional due diligence approach.
- Prioritise putting in place and strengthening practical safeguards which have a tangible impact on survivors first.
- Prioritise partners who under-report for additional support, as this indicates a lack of appropriate application of policy.
- Ensure case handling is learned from and that learning is implemented to strengthen safeguarding policy, practice and procedures.
- Learn from linked sectors, such as GBV and child protection.

2. Line up resources:

- Fund safeguarding experts and fund safeguarding work.
- Ensure that violence-response services exist and are safe for survivors. Where projects operate in contexts with limited, unsafe response services, they should have an integrated GBV and child protection component.
- Routinely integrate GBV prevention and response expertise and activities within funding opportunities which have a gender-transformative aim (such as girls' education, reproductive health and women's economic empowerment). This will mitigate against the risks of increased violence and avoid harmful backlash against adolescent girls.
- Understand that safeguarding is an ongoing journey that requires continued resourcing. The GEC Minimum Standards are exactly that – the minimum. Changing and challenging the harmful systems and social norms within the development sector that allowed safeguarding incidents to flourish will be a long-term effort and requires a long-term investment of funds.



Background



Background

The Girls' Education Challenge (GEC) was launched by the legacy Department for International Development (DFID) – now the Foreign, Commonwealth and Development Office (FCDO) – in 2012, as a 12-year commitment to reach the most marginalised girls in the world. It is the largest global fund dedicated to girls' education.

The UK government is committed to ensuring up to 1.5 million girls in some of the poorest countries receive a quality education, including girls with disabilities or who are at risk of being left behind. In particular, Phase 2 of the GEC (2017-2025) works in two parts:

- The GEC Transition (GEC-T) projects support up to 1.32 million marginalised girls to continue to learn and transition into secondary school, further education or work;
- The Leave No Girl Behind (LNGB) projects support up to 190,000 highly marginalised adolescent girls who have dropped out of, or never attended, school.

The GEC works with INGOs, technology-focused companies and education specialists as implementing partners. This wide variety of implementing partners is representative of NGOs and the third sector working in international development in 2021. Analysing the GEC's implementing partners' safeguarding progress, as a cross-section of the development sector, may therefore be useful in understanding the sector's safeguarding health overall. The lessons learned from the GEC's experience and the tools and approaches used, may also be useful for other development sector actors who wish to facilitate change in their own organisations or within partnerships.

The GEC's ways of working and focus on safeguarding have been evolving since its inception in 2012. Projects work directly with marginalised, out-of-school, adolescent girls who are at high risk of being subject to sexual exploitation, abuse and harassment as well as child safeguarding concerns because of their gender, their age, the fact that they live in challenging circumstances, the risk of violence in and around school settings and other circumstances. Since 2014, GEC projects were assessed on an annual basis against [Keeping Children Safe](#) standards and were asked to report progress towards meeting standards on an annual basis. In 2015, the safeguarding due diligence process was updated, focusing on child protection and broader safeguarding through monitoring work led by the GEC implementing partners. In 2018, the GEC safeguarding work was strengthened further, with a renewed investment of resources and a new commitment to address issues of safeguarding through new and more effective processes.⁶ This enabled a focus on ensuring child safeguarding, safeguarding against sexual exploitation and abuse and sexual harassment (SEAH) and safeguarding of project staff members were systematically addressed with increased oversight and accountability by the GEC Safeguarding Team.⁷

The lessons learned from the GEC's experience and the tools and approaches used, may also be useful for other development sector actors who wish to facilitate change in their own organisations or within partnerships.

⁶ At the same time as DFID/FCDO's strengthening of standards through its enhanced due diligence.

⁷ The GEC Fund Manager draws on technical expertise provided by all Alliance Partners with a global team spread across three continents. The GEC Fund Manager is led and administered by PricewaterhouseCoopers and Cambridge Education, working with organisations including Nathan Associates London and Social Development Direct. Social Development Direct leads on the Safeguarding Workstream and critically brought to the workstream technical expertise in rights-based approaches to development, GBV prevention and response, child protection, protection from SEAH, child safeguarding, organisational change, gender transformative, education programme expertise, and insights from efforts to reform the development sector through campaigns and whistleblowing.

In 2019, the due diligence process led by implementing partners was replaced by a detailed and systematic review processed by the GEC Safeguarding Team. This created an opportunity to create a 'baseline' for GEC partners' safeguarding status, track their improvement over time and track what worked and did not work in safeguarding.

This paper describes the successes and challenges that we have had in strengthening safeguarding with GEC implementing partners, from the beginning of 2019 to the beginning 2021. The beginning of 2021 is a natural closing of a chapter, as the vast majority of GEC implementing partners have now achieved full, meaningful compliance to the GEC Safeguarding Minimum Standards, increased case reporting, quality handling of cases, and increased mainstreaming of safeguarding within every facet of their work.

We have described the processes, tools and ways of working used between 2019 and 2021, which have resulted in these significant step-changes in GEC implementing partners' safeguarding performance. We have also explored the lessons learned from the implementation of these tools and offered recommendations for the way in which those lessons could be scaled up or replicated to support the development sector in its safeguarding strengthening.

2020-21 has perhaps been one of the most challenging years for the GEC, with the GEC implementing partners facing an unprecedented crisis as a result of COVID-19. We have therefore explored the ways in which the strong safeguarding foundations laid before 2020 have enabled a safer and more effective COVID-19 response for the girls we support.



Chapter 1:

An overview of the GEC's Safeguarding Operating Model



Chapter 1: An overview of the GEC's Safeguarding Operating Model

The GEC's Safeguarding Operating Model was designed by the GEC Safeguarding Team to help implementing partners meet the [GEC 14 Minimum Standards for safeguarding](#). The GEC's Safeguarding Operating Model considers that five main areas of work will lead to strengthened political will and positive safeguarding cultures. These five main areas are:

1 Audit

- i. Implementing partners complete due diligence self-assessments against the GEC's [14 Minimum Standards](#)⁸ on safeguarding.
- ii. The GEC Safeguarding Team conduct a thorough review of implementing partners' policies, practices and procedures. The GEC Safeguarding Team may also ask implementing partners to complete a phased Safeguarding Action Plan to fill in any gaps in safeguarding frameworks.
- iii. The GEC Safeguarding Team put contractual safeguarding special conditions in place for high-risk activities, or to cover high-risk gaps in safeguarding frameworks. These limited implementing partners' ability to deliver programming until they proved they could deliver safely.

2 Capacity development

- i. The GEC Safeguarding Team use the information gathered through the review of policies, practices and procedures to reflect on and identify gaps in implementing partners' capacity to meet the safeguarding standards.
- ii. The GEC Safeguarding Team engage with implementing partners, through one-to-one discussions, webinars and support visits to build their capacities to meet the safeguarding standards.

3 Mainstreaming across the GEC

- i. The GEC Safeguarding Team use evidence collected through audits and identified needs around capacity development to mainstream safeguarding throughout the GEC.
- ii. The GEC Safeguarding Team build capacity within the GEC to mainstream safeguarding into every part of the programme.
- iii. The GEC Safeguarding Team identify and develop Safeguarding Champions, who are members of the GEC Fund Manager with a remit to identify safeguarding risks and work with implementing partners.
- iv. The GEC Safeguarding Team strengthen GEC policies, practices and procedures.

4 Case management

- i. The GEC Safeguarding Team work with implementing partners to oversee the handling of safeguarding cases and to offer support where needed.
- ii. The GEC Safeguarding Team use an online reporting system to analyse trends in reporting to strengthen prevention, mitigation and responses across the GEC.

5 Monitoring standards

- i. The GEC Safeguarding Team and GEC implementing partners use standardised GEC monitoring tools for specialists and non-specialists to explore the success of implementing partners' safeguarding frameworks.
- ii. The GEC Safeguarding Team and GEC implementing partners identify risks and gaps, and developing actions to address them.

⁸ FCDO's Minimum Standards and therefore the GEC's Minimum Standards are based on the standards set out by the [Inter Agency Standing Committee, Keeping Children Safe](#), and the [Core Humanitarian Standards Alliance](#).

The overall goal of the model is that girls, project staff and others working with the implementing partners are protected from the perpetration of violence, exploitation, abuse and harassment through comprehensive safeguarding within the GEC and beyond. The model

aims to multiply impact through uptake of the model itself and the tools associated with it by actors external to the GEC or through other projects implemented by implementing partners.

Figure 1: The GEC's Safeguarding Operating Model

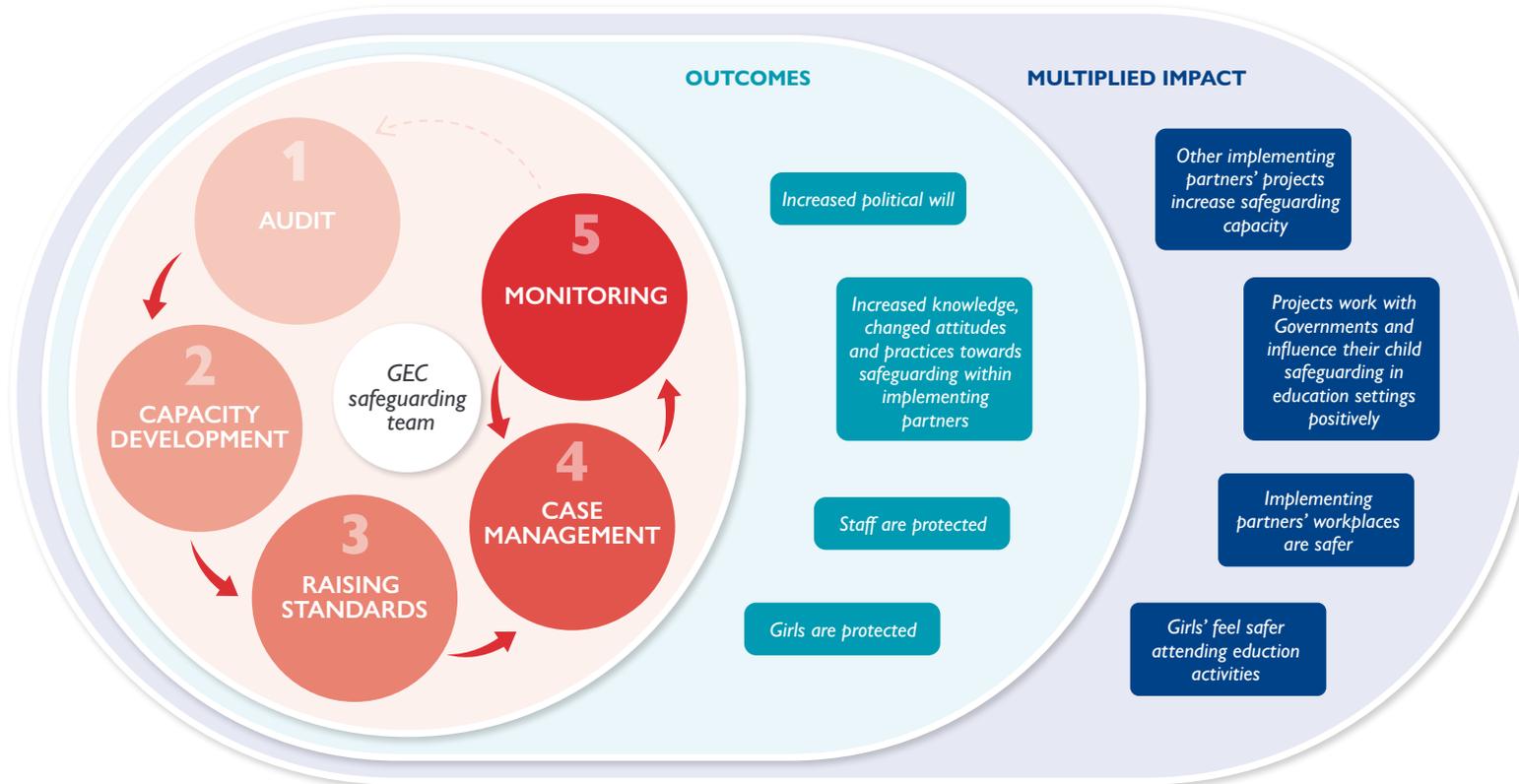
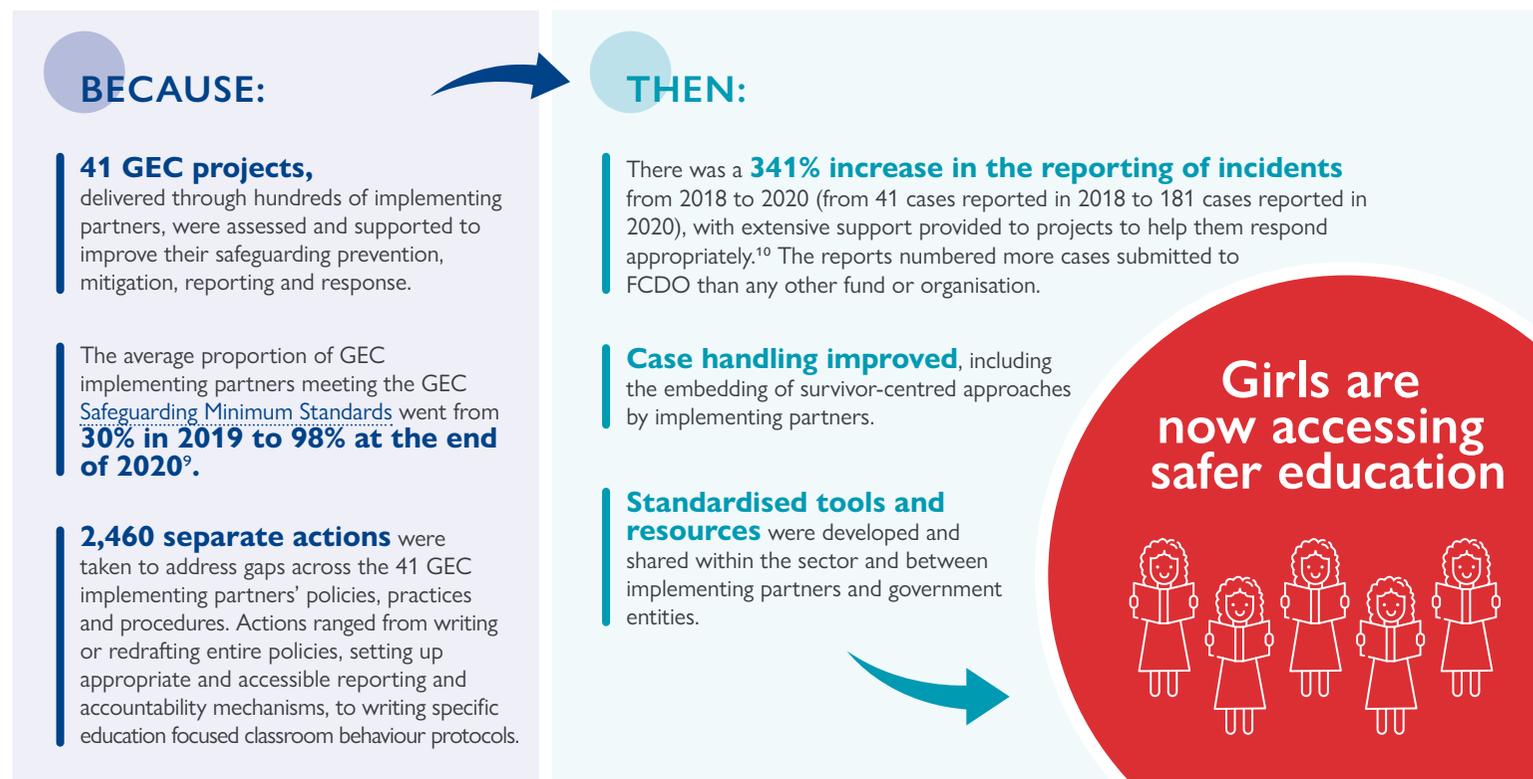


Figure 2: Key outcomes of the GEC's Safeguarding Operating Model



The following chapter explores in depth how this Operating Model and the 14 GEC Minimum Standards were used within the GEC to strengthen safeguarding across the 41 GEC projects, and how these changes led to better protections for girls and staff.

⁹ The way in which compliance is calculated is explored later in this paper. However, the remaining actions to be completed are smaller actions, which do not leave staff, girls or others at risk, and which we are continuing to work with implementing partners so that they may complete. It is notable that safeguarding is an ongoing activity and scoring may fluctuate as gaps are identified within implementing partners' case management, or as partners adapt their programming.

¹⁰ It is important to note that the vast majority of cases reported were perpetrated by non-UK funded individuals.

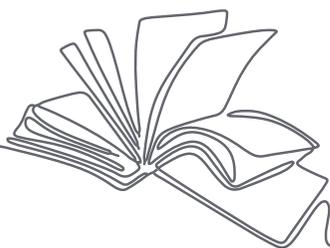
Chapter 2: Lessons learned from implementing the GEC's Safeguarding Operating Model



Chapter 2: Lessons learned from implementing the GEC's Safeguarding Operating Model

The GEC's approach to safeguarding is based on the GEC 14 Minimum Standards. These standards were originally adapted from the [Keeping Children Safe](#) standards and in 2018 were expanded to merge [FCDO's six areas of safeguarding due diligence](#).

This chapter explores: the methodology and resources needed to deliver an in-depth and supportive process, across a range of actors; the results of our approach; and an analysis of trends from implementing partners' initial reviews and across their capacity to meet the GEC Minimum Standards. This is broken down into five thematic areas of learning.



THE GEC 14 SAFEGUARDING MINIMUM STANDARDS

1. Safeguarding

 **Standard 1 (Core):** All organisations receiving GEC funding must have either an overarching/combined safeguarding policy or a combination of relevant policies which address bullying, sexual harassment and abuse targeted at girls and others working with implementing partners as well as project staff, including adults at risk and partner staff.

 **Standard 2 (Core):** All organisations must have a separate child safeguarding policy which addresses all forms of sexual, physical and emotional violence towards children.

2. Whistleblowing

Standard 3: All organisations must have comprehensive systems for escalating and managing concerns and complaints. These must include a whistleblowing mechanism available to girls and others working with implementing partners as well as project staff without reprisal.

 **Standard 4 (Core):** A clear handling framework to respond appropriately to all concerns and support the survivor of violence must also be in place.

3. Human resources

Standard 5: All organisations must have a human resources system 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.



Core standards are prioritised and not meeting core standards may result in implementing partners being delayed in implementation or phasing their implementation so that higher risk activities are delayed.



Standard 6 (Core): All staff, contractors, volunteers and other representatives of the organisation must have at least a mandatory induction when they start and annual refresher training on the organisation’s safeguarding policy (or bundle of policies), child safeguarding policy and whistleblowing.

4. Risk management

Standard 7: All organisations must have a comprehensive and effective risk management framework in place which includes reference to both safeguarding and a detailed risk register for the project. The risk register must include reference to safeguarding risks, including those for children.

Standard 8: Each organisation must have procedures in place to make sure that safeguarding processes and standards are also upheld for any partner, contractor or supplier they work with.

5. Code of Conduct

Standard 9: Each organisation needs to have a Code of Conduct which is applicable both inside and outside of working hours. This needs to set out the ethics and behaviour expected of all parties.

Standard 10: Specific behaviour protocols must be in place outlining appropriate and inappropriate behaviour of adults towards children (and children to children).

6. Governance and Accountability

Standard 11: Effective governance and accountability standards must be in place within all organisations with the Board holding ultimate responsibility for safeguarding.



Standard 12 (Core): Designated safeguarding officers must be found at different levels including at least at senior level in the country office and at the Board level.

Standard 13: There are clear guidelines for monitoring and overseeing implementation of the policy (policies).

Standard 14: All safeguarding incidents and allegations must be reported to the GEC Safeguarding Team within 24 hours.

Area of learning 1: Guidance, support and accountability

In 2018, the GEC developed a [due diligence tool](#), which broke down the GEC 14 Minimum Standards into 70 questions. Implementing partners organisations were then expected to self-assess their own compliance levels (at the beginning of the project, and then every two years) against the 70 questions, as well as the compliance levels of their downstream partners. Implementing partners used the tool to develop their own action plans, which were approved by the GEC Safeguarding Team.¹¹ However, the self-assessment process did not provide enough assurance to the GEC Safeguarding Team or to FCDO that the GEC Minimum Standards were being meaningfully met.

Implementing partners designed their own action plans in different ways, based on their own analysis. Often, different implementing partners and their downstream partners had disparate views on what safeguarding meant and the what should be included in policies, practices and procedures in order to meet standards. This meant that there was no way to easily collate data, track progress and compare capacity of meeting standards across the implementing partners. In addition, case reporting analysis demonstrated that there were a number of higher risk projects not reporting safeguarding incidents. This indicated that key components of implementing partners’ safeguarding policies, practices and procedures were not working as they should, even where they were physically in place.

These factors led to the decision to approach safeguarding in a way that offered both support and independent accountability. It was clear that implementing partners required additional, more intensive safeguarding technical support to attain the GEC Minimum Standards. The goal was to help implementing partners to develop a quality, survivor-centred approach to delivering safeguarding. The GEC Safeguarding Team developed a standardised Safeguarding Action Plan (SGAP) tool, based on the Minimum Standards, and created bespoke SGAPs for each of the 41 GEC projects based on independent evaluation of implementing partners’ safeguarding frameworks. These SGAPs acted as a roadmap and allowed implementing partners to fully understand what steps were needed to meaningfully meet standards. SGAPs broke down actions into bite-sized chunks of work and prioritised and phased them for completion. The GEC Safeguarding Team then acted as technical advisors to implementing partners to help them progress, step by step.

The self-assessment process did not provide enough assurance to the GEC Safeguarding Team or to FCDO that the GEC Minimum Standards were being meaningfully met.

¹¹ The methodology initially used for GEC safeguarding due diligence (pre-2018) within the GEC was for implementing partners to self-audit and self-assess. Pre-2018, this was the norm within the sector although the GEC’s Safeguarding Minimum Standards were still very comprehensive for the time.

HOW DOES THE GEC'S SAFEGUARDING OPERATING MODEL IMPACT THE DOWNSTREAM PARTNERS?

Lead partners are responsible for safeguarding within their consortia. Safeguarding standards are cascaded from the lead partners to the downstream partners. As part of their SGAPs lead partners are responsible for reviewing policies and practices of their downstream partners.

Detailed analysis

The GEC Safeguarding Team completed detailed analysis of each policy, practice and procedure submitted as a part of the review process for each implementing partner's SGAP. The GEC Safeguarding Team then provided implementing partners with a large amount of supportive technical support to improve specific policies and practices as needed. This support was delivered through one-to-one calls, webinars, reviews and emails. Since the beginning of the SGAP process in June 2019, to the beginning of 2021, almost all of the active GEC projects have met the GEC Minimum Standards.

Support matters

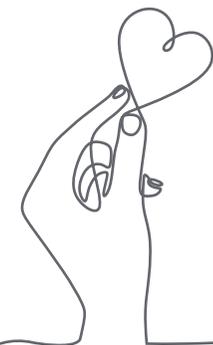
Prior to the SGAP approach being taken, implementing partners had been running for several years using the self-governed system of working towards meeting the GEC safeguarding standards. There was varied progress made regarding implementing partners' capacities to meet the original GEC safeguarding standards. The importance of guidance and support from an independent entity to whom implementing partners are accountable, has been clearly demonstrated by the progress made during the SGAP process period (June 2019 to January 2021). This evident improvement in the strength of partners' safeguarding policies, practices and procedures demonstrates the importance of external guidance, support and accountability in driving forward rapid yet sustainable change. It further demonstrates that implementing partners can make rapid improvement in both their capacity to meet the GEC Minimum Standards, and quality of their safeguarding policies, practices and procedures where there is appropriate support available and where progress is monitored and mandated by funders.

FROM LINKING PROJECTS GLOBALLY, TO PRACTICALLY APPLYING SAFE-GUARDING WITH GIRLS THEMSELVES

//CASE STUDY 1

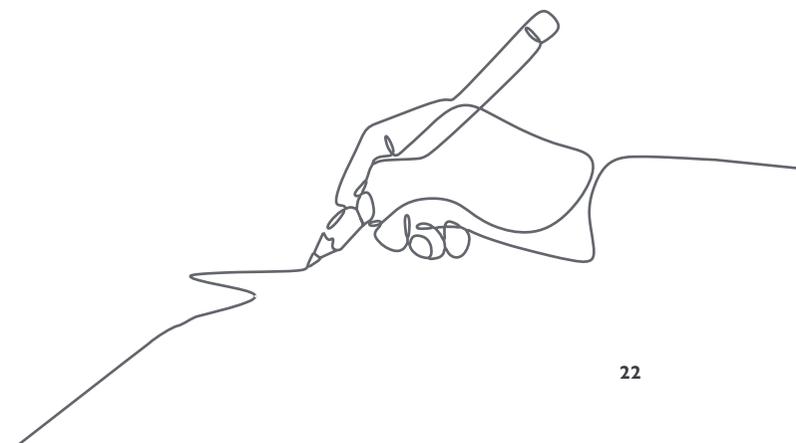
People in Need (PIN) lead two GEC projects in [Ethiopia](#) and [Nepal](#). Their projects both have a severe exposure risk and work directly with girls with disabilities and girls who have been married as children. Both projects were two of the first to become 100% compliant with the GEC Safeguarding Minimum Standards.

There were some significant changes to the way in which PIN delivered safeguarding work nationally and globally as a part of their Safeguarding Action Plan process. At first, the PIN teams found the process challenging. One strategy that was effective in supporting the project was to link the Nepal and Ethiopia teams to facilitate cross-project learning. This also meant that the progress on global policies within PIN which required amendment were coordinated across projects – projects and international advisors were therefore coordinating and collaborating on safeguarding improvements. This proved to be beneficial to PIN globally, which is now using the policies and ways of working developed through the Safeguarding Action Plan process in other projects across the world.



OUR KEY IMPLEMENTATION LESSONS:

1. The slower progress of certain projects in meeting GEC Safeguarding Minimum Standards indicated that it was more difficult to retroactively implement standards into projects. However, significant progress could still be made mid-delivery with increased focus, resourcing and determination to achieve results.
2. Contractually obligating implementing partners to deliver key pieces of safeguarding work prior to implementation provided impetus for implementing partners to deliver quickly on prioritised actions. Moving beyond a traditional safeguarding based on a compliance approach meant that implementing partners were able to balance speed and quality.
3. Requiring implementing partners to put in place core standards prior to implementation yielded positive results. Implementing partners reported that this provided them with the space to focus on safeguarding and laid foundations prior to implementation. Implementing partners that had already started to implement made slower progress in meeting the GEC Safeguarding Minimum Standards. In addition, some implementing partners that the GEC Safeguarding Team worked with from an early stage put in place broader safeguarding human resourcing than those that were nearing closure – an essential factor in projects successfully meeting safeguarding standards.
4. Implementing partners that dedicated resources to safeguarding improved in their capacity to meet the GEC Safeguarding Minimum Standards and quality quickly. Implementing partners that did not have dedicated resources, or that put all safeguarding, gender and protection responsibilities on to one or two personnel at a junior level within the project, made significantly slower progress.
5. It is important to prioritise support to implementing partners that work directly with girls or have higher risk activities. The GEC Safeguarding Team did that by working with implementing partners in higher risk activities, such as cash disbursements or distributions of education materials.
6. Self-auditing was a helpful sense-check for implementing partners and provided space for reflection. The self-audit process also provided an introduction into the GEC Safeguarding Minimum Standards and provided an opportunity for implementing partners to actively engage in the process from the start. However, self-auditing can also lead to over-evaluation of compliance levels while self-direction can lead to uneven progress and unaddressed gaps if these processes are not accompanied by support and accountability mechanisms from the GEC Safeguarding Team (or equivalent).
7. Implementing partners were less likely to prioritise safeguarding without oversight and technical support from the GEC Safeguarding Team. Implementing partners required guidance to achieve meaningful compliance. The prioritisation of safeguarding across the GEC, including the GEC Fund Manager, allowed implementing partners to mirror this drive internally.



Area of learning 2: What it takes to progress on safeguarding

Upon re-reviewing implementing partners' work in more depth in 2019, no implementing partners meaningfully met the GEC Safeguarding Minimum Standards. Where reviews highlighted elements within implementing partners' safeguarding frameworks which required urgent attention, the project was advised that they should prioritise this area and in some cases they were not able to implement education programming which was deemed to be higher risk (such as distributions of education materials or cash disbursement). When implementing partners were transferred onto their Safeguarding Action Plans, on average they had around an additional 60 actions to complete to fully meet the GEC Minimum Standards. These actions varied in the level of effort required to complete them: from writing new policies or complaints mechanisms, to creating and maintaining an appropriately detailed risk register.

The GEC Safeguarding Team provided written feedback to implementing partners on their policies, practices and procedures, and held multiple one-to-one calls to support them. They engaged directly with partners to provide concrete examples and models, moving implementing partners from abstract concepts to practical and tangible real-world examples. Where there were not examples available for safeguarding work, they supported projects to create new templates, which were then used across the GEC. Implementing partners were also sign-posted to relevant safeguarding, GBV and child protection materials from the development and humanitarian sectors, so that established tools from these sectors could be adapted for safeguarding purposes.

Keeping girls' and staff's safety and lived realities at the heart of conversations about why actions were necessary helped to shift understanding of the SGAP process away from compliance into dialogue about quality. Utilising case stories helped to create tangibility and motivation for change – exploring the consequences of unsafe practices through the story of one girl, for example, helps to facilitate a shift in perspective from procedures on paper to procedures that have a very real impact on girls' lives.

The GEC Safeguarding Team are also experienced in working in many of the contexts in which the GEC operates. This ensured that reviews of procedures were mindful of the operating context and that there

was a shared understanding of the constraints implementing partners were facing. The benefits of having an understanding of the local legal process, having a general understanding of the risks associated with referral to services in a given context (such as retraumatisation within police reporting, or forced hymen examinations in health referrals) and the endemic nature of corporal punishment, for example, meant that phasing of activities was responsive to the context.

Implementing partners were asked to submit evidence of completion of actions within their SGAPs. This was an iterative process, with: (1) implementing partners submitting to the GEC Safeguarding Team; (2) implementing partners receiving feedback in return; and (3) implementing partners amending before resubmission. Once the policy, practice or procedure submitted satisfied the feedback provided by the GEC Safeguarding Team, the action could be signed off within the SGAP, and the tracker system would provide an updated score for the project. Through this scoring process, implementing partners were able to check and keep track of their progress. This provided implementing partners with a clear target and a roadmap to reach their goal. This was delivered on a monthly basis.

The GEC Safeguarding Team was able to use the data from each SGAP, held in a larger tracker, to analyse where implementing partners required further support. Each of the 70 questions within the due diligence became sub-standards within the SGAP. These sub-standards within SGAPs may be broken down into several different actions for each project.

The GEC Safeguarding Team used this granular analysis of where implementing partners needed additional support to identify gaps and then to provide opportunities through regular learning webinars and 'safeguarding surgeries' (question and answer) sessions to support them, in addition to the support outlined above. Between August 2019 and November 2020, the GEC provided implementing partners with a series of webinars covering the following themes:

1. Power, gender and do no harm
2. Understanding whistleblowing and complaints mechanisms
3. Mapping services and survivor-centred approaches to referrals
4. Reporting and investigations
5. Communicating safely and effectively with girls about safeguarding and violence
6. Safeguarding, research and evaluation
7. Do no harm, GBV and mental health and psychosocial interventions

Utilising case stories helped to create tangibility and motivation for change – exploring the consequences of unsafe practices through the story of one girl, for example, helps to facilitate a shift in perspective from procedures on paper to procedures that have a very real impact on girls' lives.

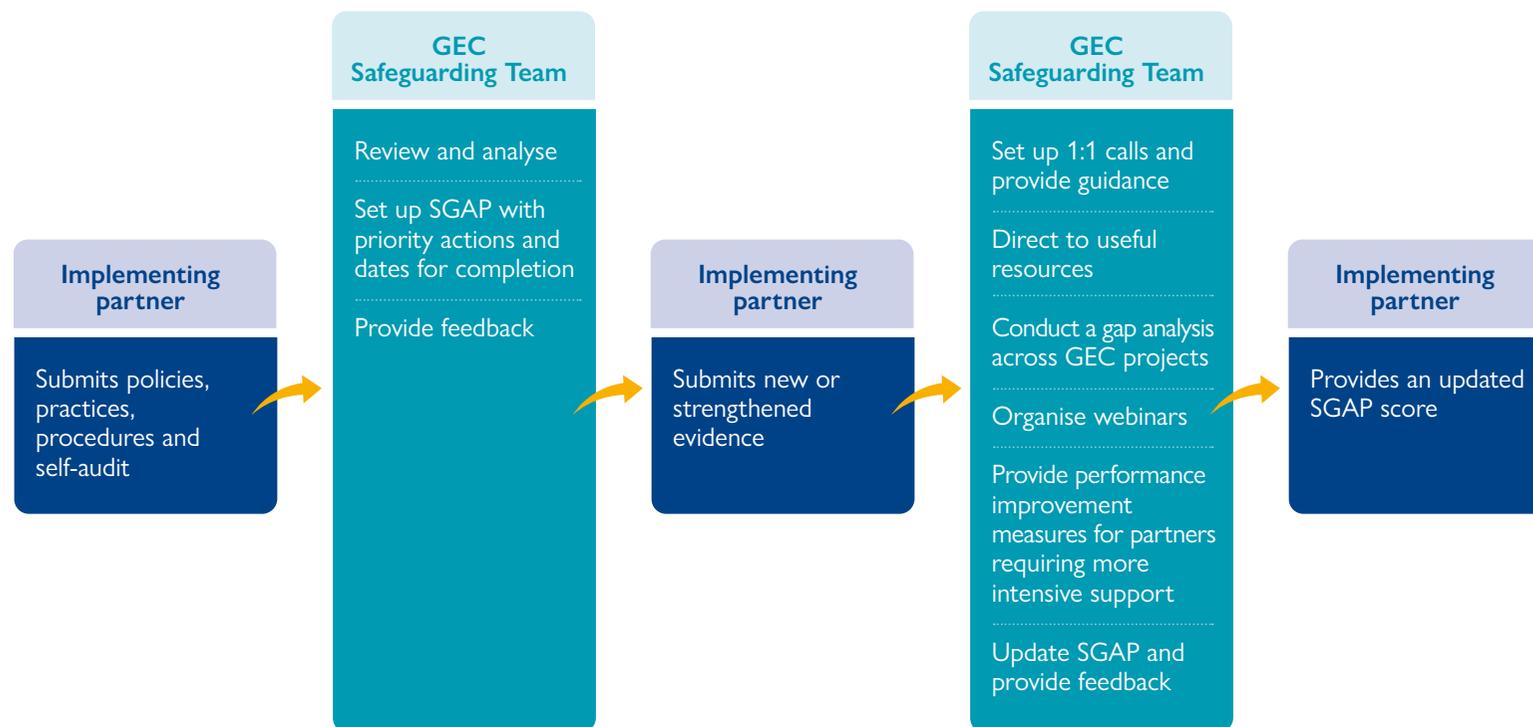
These themes represented the gaps found across implementing partners' safeguarding work. The webinars had between 100 – 190 participants per session and have been reviewed favourably by implementing partners. In particular, the way in which each addressed gaps based on practical analysis, through case studies, facilitated discussion, cross-project sharing of experiences and offered support in how to fill those gaps, was seen as particularly helpful. The GEC Safeguarding Team also held several webinars to support implementing partners during COVID-19. Webinars were recorded and implementing partners could use these on an ongoing basis as reference material.

Lastly, the GEC Safeguarding Team also supported implementing partners, where required, through performance improvement measures (PIMs). Where implementing partners required additional, intensive support and where gaps were seen to be particularly high

risk they were supported through time-bound PIMs plans. PIMs were sometimes put in place on the proviso that implementing partners should pause activities that were particularly high risk for a short period of time while gaps were filled. For example, some implementing partners were not permitted to deliver activities directly with children until they had put in place accessible and tested reporting mechanisms. Similarly, where partners did not have foundational pieces of safeguarding work in place (such as a reporting mechanisms or case handling protocols) the GEC Safeguarding Team could pause activities and put the partner on a PIM to offer further support through the process. These pauses in implementation of higher risk activities were always risk assessed and mitigation measures put in place to avoid any harm that might be caused by the pausing of activities.



Figure 3: What it takes from a GEC Safeguarding Team perspective



In numbers

2 full-time staff members

2 part-time staff members

9 Safeguarding Champions

within the GEC Safeguarding Team

100s of implementing partners; review of several hundred policies, practices and procedures

41 Safeguarding Action Plans developed

Average of **1 year** for GEC projects in LNGB portfolio to reach 90% -100% on their SGAPs

Approx. **2,460** actions (average of 60 actions per project) created across GEC implementing partners to be evidenced, updated and progressively marked as completed within SGAPs

In addition, the GEC Safeguarding Team also received support from Safeguarding Champions, who are members of the GEC Fund Manager with a remit to identify risks within project adaptations and quarterly reporting and promote safeguarding visibility regional coordination groups within the GEC. They provide support to the GEC Safeguarding Team and have been a vital part of mainstreaming safeguarding.

Area of learning 3: Common technical gaps

As explained above, the GEC Safeguarding Team were able to use collated data from the SGAPs to analyse common areas of work which required strengthening. The GEC Safeguarding Team found that the majority of implementing partners had similar strengths and gaps within their safeguarding frameworks. Although each implementing partner had their own nuances, some interesting patterns emerged which may be applicable across the third sector working within international development.

The common gaps identified were related to knowledge and understanding of GBV and child protection response work. Centring survivors within survivor assistance, for example, and understanding the nuances and limitations of confidentiality in relation to this when working with children, is a primary principle of GBV and child protection work and this knowledge and skillset was one of the largest gaps identified across implementing partners' work. Further, implementing partners' understanding of post-rape treatment, the need for GBV and child protection specialists to engage on survivor support (rather than handling it themselves as non-specialists), lack of gender values clarification within interviews, lack of understanding about gendered do-no-harm risks, and lack of understanding of the principles of communicating effectively and safely on issues of violence (principles which have been in place and known within GBV and child protection work for many years), all indicate that there is a pattern regarding a lack of understanding about the links between safeguarding, GBV and child protection work.

These uniform gaps may also indicate that: education projects and safeguarding personnel are not linking in with gender, GBV and child protection colleagues systematically; that organisations are not mainstreaming protection and gender work appropriately; or that organisations may not have access to specialists to signpost them to resources. The reasons for this gap across implementing partners should be explored further. However, it is clear that this is one of the most important gaps to be filled as it has a significant implication on service users and on survivors themselves. There is therefore a need for greater collaboration between safeguarding teams and GBV, child project and Gender and Social Inclusion colleagues within implementing partners. Safeguarding work cannot be delivered successfully without this collaboration and shared learning taking place.

What really drives change is the resourcing, the capacity and the willingness of organisations to develop, and this is fundamental to the transformational change needed within safeguarding work.

The ACTED-led GEC project, '[Closing the Gap](#)', works to deliver non-formal education and transition girls into economic and formal education opportunities in Pakistan. The project operates in Sindh province and in the Khyber Pakhtunkhwa province. Both areas are highly patriarchal, offer little opportunity for marginalised girls to access education and operate along multiple governing systems e.g. tribal, feudal and government – making the response to safeguarding concerns particularly complex.

Initial, rapid service mapping revealed a lack of services to refer survivors to (in particular, survivors of sexual violence) and that accessing services and the quality of the services themselves may be a risk for a survivor. The GEC Safeguarding Team supported ACTED to deliver an in-depth exploration of which health, legal, psychosocial and security services were available for survivors through government and civil society.

In order to provide the appropriate information to adult survivors and make best-interest referrals for children to mapped services, the project was advised to use the initial results from the mapping to develop a trusted referral pathway and to co-develop a tool with the GEC Safeguarding Team to assess the capacity (and therefore the pros and the risks) of each service. Working with GBV and child protection specialists, they mapped a broad selection of services and then narrowed those down into their trusted referral pathway.



Area of learning 4: Barriers to achieving safeguarding goals

Although there has been a general upwards swing in meeting the GEC Minimum Standards across the GEC, some implementing partners have not been as quick as others in their progress due to a variety of reasons and barriers. The SGAP process largely focuses on technical gaps and seeks to fill these, but there are significant non-technical barriers for implementing partners as well.

Some well documented barriers to implementing effective safeguarding work are listed below:

- 1. Organisation size and resourcing:** Some smaller organisations struggled to meet compliance levels as the investment of resources required had not been initially factored into budgeting. This demonstrated the need for implementing partners to be allowed to budget from the outset for the resources required to meet GEC Minimum Standards. Budgeting required to deliver safeguarding effectively should consider dedicated staff. In addition, budgeting should also consider mainstreaming efforts, ensuring shared responsibility, setting up effective reporting mechanisms and promoting reporting mechanisms. These activities rely on additional resources to deliver to an appropriate standard.
- 2. Political will:** Some implementing partners required a significant amount of advocacy and persuasion from the GEC Safeguarding Team to work towards the GEC Minimum Standards. Due to the risk involved in the type of programming the GEC partners implement, the level of safeguarding assessment required of implementing partners goes beyond the scope currently asked of them by other funds and donors. Implementing partners provided feedback that some initial resistance was due to there being a number of different safeguarding minimum standards across various donors which they found to be counterproductive and somewhat overwhelming. Following an analysis of the sector, the GEC Safeguarding Team found that the GEC provided the highest level of accountability and oversight of implementing partners' safeguarding frameworks in comparison to similar funds and donors. However, many of the GEC implementing partners found it easier to meet the safeguarding expectations of other funds and donors because of the rigour involved within the GEC's process which they saw as a positive.
- 3. Resistance to change:** Against their expectations most implementing partners were found not to have met the GEC Minimum Standardshave

at first. This can be disappointing and frustrating for the implementing partner, particularly where they have met other safeguarding standards elsewhere in the sector. Again, this contributed to some resistance to the SGAP process. However, most often this resistance reduced over time as implementing partners start to see practical improvements in their safeguarding frameworks and find value in the feedback offered. The majority of implementing partners wanted to make their projects and organisations as safe from violence, exploitation, abuse and harassment as possible and were very willing to make changes when these changes were asked for in concert with technical support and advice.

- 4. Safeguarding personnel often have little power:** A linked issue to the two points above. Where safeguarding personnel were not given enough power within a project or organisation by implementing partners, their efforts were not effectively taken up. Whilst this meant that policies were put in place, they were often slow to be implemented or rolled out. When they were rolled out, limited time or resourcing was provided to support this important work. This may have satisfied other due diligence mechanisms within the sector, but the depth within the GEC's approach meant that this was identified and raised with partners by the GEC. Most implementing partners addressed this issue. In addition, because of the focus of the GEC on safeguarding, many partners elevated their safeguarding personnel as a result of the SGAP process, without the GEC Fund Manager requesting this to happen. The SGAP process supported increases in seniority of safeguarding personnel by clearly demonstrating to senior leaders how much work goes into delivering safeguarding appropriately. During interviews, non-safeguarding personnel and senior leaders within implementing partners suggested that the level of effort and the need for the position to be at a senior level was not something they had previously thought about.

Area of learning 5: Building on early success

Increasing reporting and safeguarding case management

Alongside capacity strengthening and implementing partners putting reporting mechanisms in place, the GEC Safeguarding Team strengthened its own approach to case management and reporting over the past year and a half. This was important, not least given the high increase in cases reported between 2018 and 2020. Across the GEC implementing partners there was also confusion about the parameters of reporting 'upwards' to the Fund Manager.

BUILDING TRUST AND CONFIDENCE IN REPORTING MECHANISMS

//CASE STUDY
3

Through the SGAP process, the two GEC projects implemented by CARE in Somalia found that girls could not appropriately access their reporting mechanisms. Consequently, CARE was provided with additional support from the GEC Safeguarding Team to set up a community-based reporting mechanism, which was accessible to girls and which had multiple entry points.

Without the thorough review process involved with the Safeguarding Action Plan, this gap in the practical application of CARE's policies may not have come to light. The CARE team in Somalia and globally believe that the Safeguarding Action Plan process has been positive. For them, it refocused their energies on getting safety right, with a global advisor noting: "After all, how can a girl learn if she isn't safe?"



The concern categories adopted and the way in which the GEC Safeguarding Team handle each case (which is proportionate to the level of responsibility for case handling the project has) fit within the way in which the GEC conceptualise safeguarding.

The majority of implementing partners wanted to make their projects and organisations as safe from violence, exploitation, abuse and harassment as possible and were very willing to make changes when these changes were asked for in concert with technical support and advice.

The response expected from an implementing partner is proportionate to their responsibility, e.g. whether the subject of concern is directly employed by or volunteering with an implementing partner. The GEC Safeguarding Team support implementing partners to respond appropriately to these different concerns, and they encourage implementing partners to ensure risk assessments and referrals to service providers were completed in a timely manner.

The one-on-one support the GEC Safeguarding Team provided on each concern reported helped implementing partners to appropriately handle cases. The GEC Safeguarding Team also used an online system, called SHE¹², which allowed for analysis across projects, countries, regions and globally. Through this online analysis tools, the GEC Safeguarding Team captured information including the different types of vulnerabilities, times, dates, locations of incidents and types of perpetrator. This allowed the GEC Safeguarding Team to identify trends in reports which could be beneficial to implementing partners and to girls.

An example of the usefulness of data analysis is in identifying peaks in reporting over the school year with implementing partners and then working with them to understand why this might be. In some examples, spikes in reporting have come from increased promotion of reporting mechanisms at the beginning of the year – in which case implementing partners are encouraged to engage in awareness raising more frequently. In other examples, a peak in reporting may be due to a new teacher within school using corporal punishment in the classroom.

One of the main lessons from the GEC's Safeguarding case management work is that the SGAP process and case management work are intrinsically linked. Lessons learned through case management were integrated into implementing partners' SGAPs. This ensured that implementing partners were putting into practice an often overlooked piece of case management work: reflecting on the strengths and weakness of the handling of each case, and assessing ways that gaps identified in policies, practices and procedures can be addressed. As with other SGAP actions, this approach allowed the GEC Safeguarding Team to receive assurance that any gaps identified were filled.

Increasing capacity to respond to COVID-19

By March 2020, the SGAP process had been ongoing for around nine months and many of the GEC implementing partners had already been progressively increasing their safeguarding capacity and implementation. Implementing partners were able to build on this solid foundation to respond appropriately to COVID-19.

In order to respond to the pandemic and the change in context, the GEC Safeguarding Team published an initial COVID-19 safeguarding guidance note to support implementing partners in the development of their response. The GEC's guidance note on Safeguarding, Protection and COVID-19 (originally launched in March and updated in April) contained information on safeguarding, protection and GESI¹³-related risks and potential interventions.

Implementing partners used the GEC safeguarding guidance note to inform their initial response plans. In analysing these initial response plans, the Safeguarding Team were able to identify three common themes that required increased safeguarding capacity, templates, guidance and protocols for the GEC implementing partners:

1. Suggested activities to keep in contact with girls had not yet taken into account issues of online safety and grooming or put in place behaviour protocols for groups calls or chats. The GEC Safeguarding Team therefore produced and shared guidance for 'Keeping in Contact with Girls' through two-way communications and an Standard Operating Procedure template.
2. Many implementing partners were not used to delivering humanitarian-style assistance and required support to deliver distribution of aid in a safe way. The GEC Safeguarding Team therefore produced and shared a safe distribution template.
3. Many implementing partners planned to increase their communications on protection and safeguarding related themes. The GEC Safeguarding Team was aware that this was an area that many of the GEC implementing partners had previously needed support on, and therefore produced and shared guidance on protection and safeguarding-related communication materials (radio, posters etc.).

To facilitate a rapid response to COVID-19, the GEC Safeguarding Team took the decision to produce and share templates for their completion and guidance. Prior to the COVID-19 response, the GEC Safeguarding Team championed an approach of individual projects and organisations creating their own policies, practices and procedures with the GEC Safeguarding Team's support (as described above). However, the usual iterative process was unsuitable to ensuring additional safeguards were put in place rapidly. Safeguarding conditions to the initial response plans were added to the SGAPs to ensure that records on progress were kept up to date.

One of the key learnings from the GEC's Safeguarding Case Management work is that compliance and case management work are intrinsically linked.

¹² SHE is an online platform used by the GEC Safeguarding Team and GEC implementing partners to communicate on safeguarding incidents. The implementing partners report any safeguarding concern through SHE. Notifications are received by the GEC Safeguarding Team who categorises the concern using the details provided and create actions for the implementing partner to complete. Through SHE further information can be requested by the GEC Safeguarding Team and implementing partners can report on how any investigations and follow-up actions.

¹³ GESI stands for Gender Equality and Social Inclusion.

During the initial COVID-19 response, the Safeguarding Team reviewed, responded and signed off the safeguarding conditions across the GEC projects. In addition to the actions listed above, implementing partners were also required to adapt existing reporting mechanisms and service mapping in response to the changing context of COVID-19. Many had unique actions related to where they were with implementing their SGAP and their proposed activities (for example, the strengthening or adaptation of cash distribution standard operating procedures).

The GEC Safeguarding Team was able to understand where implementing partners may have required additional support to fill gaps in their safeguarding frameworks – for example where implementing partners did not have enough foundational safeguarding work in place yet to deliver higher-risk activities in a public health crisis. Given the increased external and exogenous risk in the COVID-19 crisis, some implementing partners were supported through a phased, short-term action plan. As implementing partners met actions within this plan, they were able to implement increasingly higher-exposure risk activities. For an overview of the way in which the GEC calculates risk, please go to ‘Safeguarding risk calculator’.

Area of learning 6: Multiplying impact – replicating at global and local levels

As a result of aligning their policies and practices to the GEC’s Safeguarding Operating Model, we have seen implementing partners changing or adding to their global safeguarding policies, as well as shifts in understanding across organisations (across 41 projects, all required a change to existing global policy or required the development of a new global policy as a result of the SGAP process). This means that the impact of the GEC’s safeguarding work will have impacted the ways of working (now and in the future) of multiple organisations.

Governments have adopted tools and approaches that will have a long-term effect on global, regional and national implementation of safeguarding frameworks, going well beyond the GEC itself. Many of the GEC implementing partners are replicating elements of the SGAP process within their organisations, taking lessons learned from implementing one or more parts of their project’s safeguarding framework and replicating these across other projects, in other contexts outside of the GEC.

CASE STUDY. MULTIPLYING IMPACT GLOBALLY

//CASE STUDY 4

The **EAGER** project implemented by the IRC in Sierra Leone like were, like some other GEC projects, delayed in their implementation until some key safeguarding policies and practices could be put in place. However, they rapidly worked through their Safeguarding Action Plans and were one of the first implementing partner to complete their SGAP, in less than a year after it was created.

IRC’s global safeguarding work has been influenced heavily by the SGAP approach and the roll-out of this approach now appears globally within the IRC’s two-year strategic action plan on safeguarding. A number of elements of the SGAP have already been integrated within their approach to partnership – replicating the collaborative approach to safeguarding support and learning offered by the GEC Safeguarding Team.

CASE STUDY. MULTIPLYING IMPACT LOCALLY

//CASE STUDY 5

ENGINE II, a project led by Mercy Corps in Nigeria, is another example of the way in which the GEC safeguarding work multiplied impact locally. The **ENGINE II** project worked with local government schools to support girls’ education. Through this work, Mercy Corps developed policies and practices which have been taken up beyond the project’s scope.

The project showed there is a need to consider mapping of services prior to implementation. Where projects have a severe safeguarding risk associated with them, additional support may be needed to ensure appropriate services are in place to respond to safeguarding incidents. This may involve additional investment in protection-related services, in particular health services and psychosocial services that can provide life-saving responses to sexual violence. Further, this would also put in place a sustainable approach to safeguarding, as – following closure of a project – health and psychosocial services (or other services which have been strengthened) would continue to respond to violence, exploitation, abuse and harassment issues.

Chapter 3: Tools for maintaining progress



Chapter 3: Tools for maintaining progress



Over the course of 2021, the GEC Safeguarding Team has developed tools and ways of working to maintain the progress made by implementing partners through the implementation of the GEC's Safeguarding Operating Model. Below, two of these approaches are explored in more detail: risk assessment and monitoring.

Safeguarding risk calculator

Each quarter, the GEC Safeguarding Team calculate the risk level of projects using projects' SGAP scores¹⁴: an assessment of their report handling (considering the principle of proportionality and exogenous/external risk). The calculation for this is below.

**Safeguarding risk level =
Project Risk (SGAP score + Case Reporting and Handling score
+ Reports + Exposure risk) + Exogenous/External risk**

The GEC Safeguarding Team uses this scoring, in addition to an in-depth understanding of project's work, to prioritise projects for additional support, monitoring and to provide feedback to the implementing partner through formal review.

The Case Reporting and Handling score is provided by a member of the GEC Safeguarding Team based on their understanding of the project's exposure risk, whether reports have been received and how those reports have been handled. This scoring is always proportionate to the exposure risk of the project's activities. One of the aspects considered in this scoring process is that the use of reporting mechanisms demonstrates that they are functioning, that there is trust in them and that girls and staff understand appropriate and inappropriate behaviour.

As the GEC is a fund which encourages innovation and adaptation, the level of exposure risk can fluctuate. As contexts change, for example in a public health crisis like COVID-19, the external risk for a project may also change. Using this calculation therefore supports the members of the GEC Safeguarding Team to assess if an intervention would be too high risk for an implementing partner to deliver, considering their current safeguarding capacity and their recent handling of cases. The calculator also allows the team to prioritise certain implementing partners for a higher level of support in mitigating risk.

¹⁴ The SGAP score is the percentage indicating level of compliance. A high SGAP score indicates a high level of compliance and a low SGAP score indicates a low level of compliance. High and low levels of compliance are determined by how many actions identified during the audit are completed.

Monitoring of safeguarding activities

The GEC continues to monitor the progress of implementing partners through evidence such as safeguarding monitoring reports, testing reporting mechanisms, trainings and policy updates). The GEC Safeguarding Team has also developed a set of standardised monitoring tools to work with implementing partners and trialled these tools over the course of 2020.

USEFUL TOOLS FOR MONITORING SAFEGUARDING ACTIVITIES:

- [Distance monitoring tool](#)
- [Project visit debrief questions](#)
- [Non-specialist monitoring tool](#)
- [Safety audit tool for specialists and non-specialists](#)
- [Statement of Work](#)
- [Safeguarding monitoring checklist](#)
- [Culture, enabling environment and implementation](#)
- [Monitoring policy and compliance](#)
- [Due diligence tool](#)

Implementing partners have found the information gathered and the feedback provided by the use of the GEC's safeguarding monitoring tools to be beneficial. The focus of monitoring is on quality, knowledge and culture – exploring with implementing partners' staff members whether or not policies are being put into practice in meaningful ways.

The GEC Safeguarding Team have developed in-person monitoring tools, for both specialists and non-specialists. Specialist monitoring tools explore survivor-centred approaches, understanding of internal case handling procedures and knowledge and attitudes regarding gender and child protection. Non-specialist tools can be delivered by anyone visiting a project, and include basics such as: whether implementing partners introduce their policies and procedures to the visitor; whether staff members know who it is they should report safeguarding incidents to (gathered through informal conversations with project staff); and whether codes of conduct and other safeguarding messages are on display. The non-specialist monitoring tools were adapted from tools developed by the UK Government's Office for

Standards in Education, Children's Services and Skills (Ofsted). In addition, the GEC Safeguarding Team has also developed a Safeguarding Safety Audit tool which can be used by anyone visiting a project site with visual evaluation only. This is based loosely on the safety audits conducted within GBV and child protection programming.

In the context of COVID-19, the GEC Safeguarding Team needed to develop a tool that could be used at a distance, as travel and face-to-face monitoring became restricted. Although not a complete substitute for face-to-face monitoring, the tool the GEC Safeguarding Team designed and rolled out has proven to be useful and cost efficient. The tool uses online or phone communication to interview a wide cross-section of implementing partners' staff members and explore their understanding of safeguarding. Practical case examples are used and interviewees explain what their response would be. The GEC Safeguarding Team have now used this tool with 12 implementing partners across the GEC.

The strongest themes coming through the use of these safeguarding monitoring tools are:

- Staff based in offices (administrative functions, country programme leadership etc) are more familiar with safeguarding policy, procedure and protocol than those who interact daily with girls – demonstrating that knowledge is not situated with the people who need it the most.
- Staff who have the least hierarchical power (guards, cleaners, facilitators etc) are also the least likely to understand reporting mechanisms and codes of conduct. This again demonstrates that knowledge is often not situated with the people who need it the most.
- Lastly, values clarification amongst staff, which assesses their social norms concerning power and gender is vital and requires further exploration with staff members and volunteers. Many respondents, who have direct contact with girls across the GEC projects, stated that they would investigate themselves whether a girl was telling the 'truth' following a disclosure of a safeguarding incident. Also, they would not follow survivor-centred approaches and would take the girl to the police or traditional legal system.

These gaps are being addressed with the GEC implementing partners now and the GEC Safeguarding Team will continue to monitor progress. However, as these areas are key to appropriate survivor assistance and this trend is seen across implementing partners and contexts, it can be concluded that these are sector-wide issues which need to be addressed across the sector.



Conclusion and recommendations



Conclusion and recommendations

The past two years have seen extensive, intensive and meaningful improvements in safeguarding work across all of the GEC, including the GEC Fund Manager and implementing partners.

The GEC's Safeguarding Operating Model developed from minimum standards to create a holistic approach that supports implementing partners in strengthening their safeguarding policies, practices and procedures, as well as their overall capacity. With 41 projects with diverse understandings and safeguarding capacity levels across the GEC, this presented challenges as well as opportunities. The greatest of these opportunities was for the GEC to have a role in facilitating sustainable change across the sector:

SECTOR TRANSFORMATION

Although the system and the approach developed by the GEC in order to mitigate risk is innovative, practical and demonstrates that protection is possible when safeguarding is strengthened – it is not a panacea nor is it a substitute for the larger, radical changes that have been agreed at the 2018 Safeguarding Summit and beyond. It is important to reflect that the GEC Minimum Standards are minimum. Safeguarding in the development sector is a process and for lasting change to be seen and for incidents to drop, there needs to be greater equality and a deeper review of power across the sector.¹⁵ Although change in the sector is underway, safeguarding incidents will continue to occur – within every context and every organisation – until the structural and societal inequalities at the heart of these abuses are addressed. The GEC's Safeguarding Operating Model offers a means to effectively progress high risk projects to reach meaningful compliance, but can only be seen as a set of tools that should be delivered in tandem with larger, sector-wide transformational change.

The SGAP process has improved the safeguarding policies, practices and procedures of 30 lead implementing partners and hundreds of downstream implementing partners. Understanding of safeguarding has grown across implementing partners, as has their own safeguarding influence on government and other development sector colleagues. The GEC's overall Safeguarding Operating Model has demonstrated that large-scale shifts in meeting the GEC Safeguarding Minimum Standards and capacity can be achieved across the development sector through oversight and accountability mechanisms being put in place and that a supportive, non-judgmental environment is key to this success.

This paper outlines the tools and resources used to deliver the GEC's Safeguarding Operating Model and the lessons learned from the GEC Safeguarding Team's perspective. However, the model would not have been a success without the dedication and hard work of the safeguarding personnel within implementing partners – girls and staff members are safer because of their efforts. We are grateful to everyone working on the GEC for their continued dedication to prevention, mitigation and response to violence, exploitation, abuse and harassment.

¹⁵ See, for example: Ratcliffe, R., 2018. 'You need to hear us': over 1,000 female aid workers urge reform in open letter. *The Guardian*, [online] Available at: <https://www.theguardian.com/global-development/2018/mar/08/1000-women-aid-workers-urge-reform-in-open-letter> [Accessed 15 November 2020]; House of Commons, 2018. *Sexual Exploitation And Abuse In The Aid Sector, Eighth Report Of Session 2017–19*. [eBook] House of Commons International Development Committee. Available at: <https://publications.parliament.uk/pa/cm/cm201719/cmselect/cmintdev/840/840.pdf> [Accessed 15 November 2020]; NGO Safe Space, 2020. *NGO Safe Space Call To Action*. [online] NGO Safe Space. Available at: <https://ngosafespace.org/2018/10/17/ngo-safe-space-call-for-action-17-october-2018/> [Accessed 15 November 2020].

Recommendations

Move beyond compliance

- **Listen to those at risk, particularly women and girls.** Make sure that safeguarding work is not reinforcing the very same hierarchies of oppression at the heart of why violence, exploitation, abuse and harassment occur. Safeguarding should never be something which is done to communities, but rather in partnership with both communities and staff.
- **Look beyond a policy-level, traditional approach.** Safeguarding processes should be focused on quality assurance and on ensuring policies are put into practice.
- **Focus on prioritising actions which have a direct impact on survivors first.** Ensuring accessible reporting mechanisms are in place, case handling frameworks are written and rolled out, and embedding a survivor-centred approach throughout the safeguarding framework should be actioned first and implementation should be dependent on these being in place.
- **Acknowledge that the sector is learning.** Working with implementing partners in ways that facilitate omni-directional learning, transparent communication and trust building are all key to creating change. Implementing partners may be wary of revealing weaknesses in their safeguarding frameworks. This allows a culture of impunity to thrive. Only when donors and implementing organisations can take an honest look at gaps at all levels of safeguarding policy and implementation, can action to address these gaps begin to be prioritised. Partners can then be supported and held to account to instigate deep and long-lasting change.
- **The SGAP process and case work should be responsive to one another, not separated.** Lessons learned from case handling should impact on SGAP scores, with clear and accountable actions generated from each incident and concern. For example, if case work identifies mistrust in reporting mechanisms, then a partner would no longer be compliant and would need to work to address this gap in their reporting system.
- **Assess risk against capacity to meet the standards and numbers of cases reported, to address under-reporting.** Where a high-risk project¹⁶ has been implementing for some time without any reports, this should be treated as an urgent issue. Projects should quickly explore the strength, trust, confidentiality and accessibility of their reporting mechanism. Being cognisant that violence, exploitation, abuse and harassment exist within the development sector, as it does throughout all societies, means understanding that low/no reporting should never be considered a positive.
- **Learn from linked sectors.** Ensure the safeguarding sector is learning from the GBV and child protection sector. Adapting tried and tested resources saves time, offers value for money and helps to demystify safeguarding.



¹⁶ Because of context, exposure level to girls or because of low levels of safeguarding compliance.

Line up resources

- **Fund safeguarding experts and fund the work.** Implementing partners should be required by donors to plan and resource adequately safeguarding work for the entire project life-cycle. There is a direct relationship between the speed at which projects met the GEC Minimum Standards and the point in the project management cycle the Safeguarding Action Plan is put in place. Getting safeguarding right from the start is important and means that there is less effort in trying to retrofit and roll out policy and practice changes once the project has begun. Safeguarding is complicated, technical and requires funds to hire and train staff, deliver communication materials, monitor implementation and support survivors to access services.¹⁷
- **Ensure violence response services exist, are safe for survivors to attend and response systems are strengthened in a sustainable way.** Projects operating in contexts with limited, unsafe response services should all have an integrated GBV and child protection component to them. There is an ethical imperative that where survivors disclose violence, exploitation, abuse and harassment, life-saving interventions are in place to support each individual's recovery. Mapping of GEC implementing partners has revealed that violence response services are scarce in many contexts, and where they are available there is significant risk attached in accessing them.
- **Funding opportunities for gender transformative women's and girls' education, empowerment, reproductive health and rights programming should routinely include resources for GBV prevention and response.** To effectively safeguard gender-transformative programming, donors need to resource GBV prevention and response as a component of funding opportunities, which seek to advance women and girls' rights by, for example, shifting power and social norms, and increasing girls' knowledge and skills to advance their right to education, results in adolescent girls disclosing violence and seeking support. Gender-transformative programming, such as girls' education, also requires specialist GBV prevention expertise to effectively mitigate the risks of increased violence and avoid harmful backlash against adolescent girls.

- **There is no quick fix and minimum standards are exactly that – the minimum.** Be mindful that safeguarding work – and in particular changing and challenging the harmful systems and social norms within the development sector that allowed safeguarding incidents to flourish – will be a long-term effort and requires a long-term investment of funds. The GEC is proud of the progress the GEC implementing partners have made with the support and accountability of the GEC Safeguarding Team and FCDO, however, we acknowledge that there is still have more work to do. Although many projects have met the Safeguarding Minimum Standards, we now need to maintain and consolidate that progress. We must continue to listen to adolescent girls and work with the GEC implementing partners to deepen understanding and learn more from ongoing implementation and reflection.



¹⁷FCDO encourages any partners implementing FCDO-funded projects to allocate appropriate resources to safeguarding activities. For example, partners are invited to include a specific resource indication for safeguarding when bidding for a project.

Girls' Education Challenge (GEC) Safeguarding Toolbox

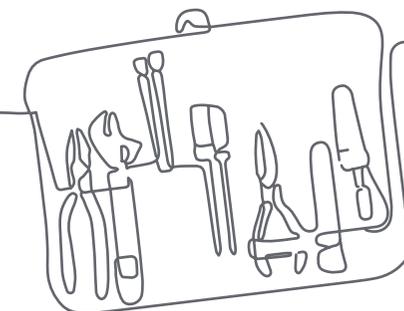


Girls' Education Challenge (GEC) Safeguarding Toolbox

This is a collation of tools and guidance developed by the GEC to deliver a comprehensive safeguarding strategy. Different user groups may find these tools and guidance useful, including specialists and non-specialists. For each tool and guidance, we offer an explanation of why they were created and how they can be used. Although created for GEC they can be adapted by other users based on their needs.

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| 1 GEC Safeguarding Policy | This is comprehensive policy for an interconnected partnership between different organisations. It includes statements on sexual exploitation, abuse, harassment, child safeguarding, safeguarding of adults-at-risk and bullying. It also governs the way in which staff interact with each other, with partners, and with girls and other stakeholders the programme supports. |
| 2 GEC Due Diligence Tool | This tool is used by GEC partners to rate themselves against the GEC's 14 Safeguarding Minimum Standards. |
| 3 GEC RAAG (red/amber/green) and Risk Guidance | This tool outlines how the GEC assesses risk of GEC projects on an initial and then ongoing basis. The GEC calculates the prioritisation of projects for support using scoring which takes into account compliance levels to the GEC Minimum Standards, exogenous risk, exposure risk of the project and case handling. |
| 4 GEC Safeguarding Action Plan (SGAP) template | This tool contains an example of an SGAP for a GEC project in 'Tab c'. The example SGAP is populated with actions which were typically identified for GEC projects when they first started working on their SGAPs. This example may help safeguarding professionals to reflect on recurrent gaps with regards to project's safeguarding policies, practices and procedures. 'Tab b' called 'portfolio progress analysis' provides a template tracker that allows the user to analyse the progress of several projects at the same time. This helps safeguarding professionals understand where the most urgent gaps in capacity, policy, practice or procedure are across a portfolio of projects. It also helps provide support and resources in order to be able to fill those gaps. |
| 5 GEC Safeguarding and Evaluation Guidance | This guidance was developed to support the GEC Evaluation Team. This may be useful for evaluation specialists who want to learn more about how to include key elements of safeguarding in their work. |
| 6 GEC Safeguarding Champion Terms of Reference (ToR) | This is an example ToR for safeguarding champions. |

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| 7 GEC Safeguarding Service Mapping Tool | A service mapping tool which supports organisations to assess the quality of safeguarding services to be able to develop a trusted referral pathway and offer information to survivors regarding any risks to accessing services. |
| 8 The categories of concerns that GEC partners report to the GEC Safeguarding Team | The GEC's 'concern categories' may be useful to any entity setting up reporting for complex, high-risk projects working across multiple forms of safeguarding concern and working with partners to address 'grey' areas within safeguarding – such as where there is heightened duty of care responsibility but no responsibility to investigate. |
| 9 GEC Safeguarding Distance Monitoring Tool | This tool can be used to conduct desk-based monitoring over the phone with staff members of a project. |
| 10 GEC safeguarding project visit debrief questions | These questions can be used following from a visit to a project to follow up and ensure no causes for concern are missed. |
| 11 GEC Safeguarding Non-specialist Monitoring Tool | This tool contains questions to consider and ask by non-specialists when visiting projects. |
| 12 GEC Safeguarding Safety Audit Tool for specialists and non-specialists | This tool can be use in education settings, such as schools, based on observation only. |
| 13 GEC Safeguarding Monitoring Statement of Work | This document is an example statement of work for monitoring visits. |
| 14 GEC Safeguarding Monitoring Checklist | This is a simple checklist for anyone engaging in safeguarding monitoring activities with issues to keep in mind before and during the implementing of their assignments. |
| 15 GEC Safeguarding Monitoring: Culture, enabling environment and implementation | This tool provides example questions for monitoring visits and example focus group questions. The questions focus on culture, enabling environment and implementation. |
| 16 GEC Safeguarding Monitoring: Policy and Compliance | This tool provides example questions for monitoring visits with a focus on policy and compliance. |





Find out more: www.girlseducationchallenge.org | learningteam@girlseducationchallenge.org

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