

INTERNATIONAL FINANCE CORPORATION

MANAGEMENT PROGRESS REPORT

ON

**IMPLEMENTATION OF THE
MANAGEMENT ACTION PLAN**

FOR

**BRIDGE INTERNATIONAL ACADEMIES (BRIDGE 04)
(PROJECT# 32171, #38733, #39170, #39224)**

KENYA – EAST AFRICA

March 10, 2025

Contents

ABBREVIATIONS AND ACRONYMS	iii
I. MAP IMPLEMENTATION BACKGROUND	1
II. MAP IMPLEMENTATION STATUS	1
III. UPDATE ON MAP IMPLEMENTATION ACTIONS	7

ABBREVIATIONS AND ACRONYMS

CAO	Office of the Compliance Advisor Ombudsman
CSEA	Child Sexual Exploitation and Abuse
CSO	Civil Society Organization
CY	Calendar Year
ECPR	Emergency Child Protection Response
E&S	Environmental and Social
FI	Financial Intermediary
FY	Fiscal Year
GBV	Gender-Based Violence
GBVH	Gender-Based Violence and Harassment
IFC	International Finance Corporation
MAP	Management Action Plan
SEAH	Sexual Exploitation, (sexual) Abuse and (sexual) Harassment
SEP	Stakeholder Engagement Plan
UN	United Nations
UNFPA	United Nations Population Fund
UNICEF	United Nations Children’s Fund
WBG	World Bank Group

I. MAP IMPLEMENTATION BACKGROUND

1. This Management Progress Report provides an update by International Finance Corporation (IFC) Management on the implementation of the [Bridge 04 Management Action Plan \(MAP\)](#), approved by the Board on March 13, 2024, in response to the Compliance Investigation Report by the Office of the Compliance Advisor Ombudsman (CAO) regarding the complaint about Bridge International Academies (Bridge 04). The complaint is related to Projects #32171, #38733, #39170, and #39224, which were education sector projects in Kenya. IFC made an investment in NewGlobe Schools, the former parent company of Bridge International Academies.
2. IFC exited its investment in March 2022. After this exit, IFC had an indirect exposure to Bridge through a financial intermediary, Learn Capital Venture Partners Fund III (Project #32429). As of February 2024, Bridge became an independent foundation in Kenya with no equity ownership by NewGlobe Schools. Neither Learn Capital III nor IFC have any exposure to Bridge.
3. The Board-approved MAP for Bridge 04 has two components: (1) developing a remediation and prevention program in Kenya; and (2) strengthening management of gender-based violence (GBV), including child sexual abuse, risks in IFC's investments.
4. In August 2024, CAO merged the four Learn Capital cases with Bridge 04: [Learn Capital 04 Compliance Appraisal Report](#). CAO found that the four complaints, which were each brought by a former student at a Bridge International Academies school, are substantially related to the issues investigated under the Bridge 04 compliance process.
5. IFC invested in Bridge International Academies with the ambition of helping children in Kenya gain access to quality education and the opportunities that come as a result. This case has underscored the importance of safeguarding vulnerable populations, particularly children, and working with clients so they address occurrences of GBV and child sexual abuse in projects. Both the World Bank Group President and IFC's Managing Director have emphasized to staff the sense of urgency and the importance of escalating issues in a timely manner, as well as steps that are being taken to better equip operational teams to handle these sensitive matters. IFC continues to build on the lessons learned from this case to foster a culture of accountability, learning, and proactive engagement.

II. MAP IMPLEMENTATION STATUS

A. Key Updates

6. **Progress on Bridge 04 MAP Implementation:** Following the initial progress report to the Board in October 2024, this supplementary update aims to inform the Board about the progress in implementing the approved Bridge 04 MAP within twelve months of its approval. IFC has made substantial progress to inform the remediation and prevention program in Kenya. It has formed a dedicated project team with GBV experts; engaged with the four Bridge complainants and their CSO representatives as well as other survivors and survivor networks; established an independent Advisory Committee; conducted extensive consultations through UNFPA and UNICEF, selected for their complementary expertise in GBV and child protection work; and developed an initial program concept. Concurrently, IFC has completed most of the institutional strengthening actions, with remaining initiatives expected to be completed in FY26.

7. **Comprehensive UN-Led Stakeholder Consultations:** In June 2024, IFC engaged UNFPA and UNICEF, following WBG procurement rules, to conduct stakeholder consultations to inform the design of the remediation and prevention program in Kenya. The consultations adhered to internationally recognized guidelines, including the [UN Women’s Safe Consultations with Survivors guidelines](#), and followed a survivor-centered approach focusing on consent, privacy, confidentiality, and non-discrimination. They involved a wide range of stakeholders and everyone consulted was briefed ahead on relevant ethical standards and protocols. In line with the UN Women guidelines, survivors were not required to identify themselves as survivors of abuse in a Bridge school setting or any other setting and none chose to do so. Additionally, during the consultations with survivors, counselors trained in trauma were on hand. The consultations, held from July to November 2024, involved 654 stakeholders across 26 counties, including 245 duty-bearers and 309 community members. Additionally, the consultations included 100 survivors and survivor networks, with a dedicated session for the four Bridge complainants on November 10, 2024.¹ Although the consultations did not require survivors to self-identify, they were intentionally designed to maximize the engagement of former Bridge students. The UN-led consultations were strategically held in counties where Bridge schools operate, utilizing the Bridge referral network² to disseminate information. Additionally, the UN hired the Wangu Kanja Foundation (WKF), which has one of the most expansive survivor networks spanning every county in Kenya, to help mobilize survivors. Thus it is possible that the group of 100 may include other Bridge students beyond the four complainants.
8. **Engagement with Bridge Complainants:** IFC has actively engaged with the four former Bridge students who brought the Learn Capital complaint via their CSO representatives (Accountability Counsel, Inclusive Development International, Oxfam, and the Wangu Kanja Foundation)³. Over the past year, IFC has held eight meetings with the CSOs to seek the Bridge complainants’ inputs for the consultation process and program development, as well as to provide updates throughout the process.⁴ Following the CAO’s decision to merge the Learn Capital complaint with Bridge 04, IFC again reached out to the CSOs to gather the Bridge complainants’ views, resulting in a dedicated consultation session on November 10, 2024, led by UNFPA. In January 2025, the CSOs requested additional consultations to identify more survivors specifically from a Bridge school setting. IFC agreed to additional consultations with adult survivors of sexual abuse in any school setting, which will adhere to UN Women guidelines and complement the extensive consultations already conducted. IFC also agreed to the CSOs’ request to conduct consultations with additional education sector stakeholders.
9. **Program Development and Updated Timeline:** The project team has been evaluating the results of the UN consultations and the current GBV services in Kenya to determine parameters and priorities for the program design. The additional consultations will extend the program development timeline, with IFC now aiming to submit the program design to the Board in June 2025. The timeline implications of these additional consultations have been discussed with the CSO representatives of the four Bridge complainants.
10. **Institutional Strengthening Actions:** IFC completed a Portfolio Review to identify child sexual abuse and GBV risks in its active investments and conducted in-depth reviews of high-risk sectors. Corrective action plans have been developed where necessary, and an anonymized summary report will be shared with CAO.

¹ The 100 breaks down to 96 survivors and survivor networks from any setting plus the four survivors from Bridge schools. In keeping with the UN guidelines, survivors were not asked to self-identify.

² The Bridge referral network refers to NGOs that the Bridge Schools referred sensitive cases to. They are essentially Child Protection and GBV agencies.

³ IFC respected the former students' preference to remain anonymous and not to meet directly with IFC staff.

⁴ IFC met with the CSOs virtually on May 28, September 11, October 3, October 15, and October 22, 2024, and January 16, 2025. In-person meetings were held in Nairobi on July 29, 2024, and February 7, 2025.

New client incident reporting obligations and updated legal covenants for new investments were rolled out in the first week of March 2025. IFC has enhanced its GBV expertise with five new regional GBV specialists and a senior Child Protection consultant. New GBV tools, training, and due diligence processes have been implemented, with ongoing efforts to improve awareness and response to GBV and child protection risks. Due diligence platforms, such as IFC’s internal sustainability tool (ESG360), have been established and will continue to be strengthened.

B. Remediation and Prevention Program in Kenya

B.1. Project team

11. IFC established a project team based in Nairobi, Kenya consisting of a project lead and two GBV specialists, supported by global colleagues working on gender, CSO engagement, and communications. The team is overseen by two Vice Presidents and three Directors. The team is responsible for developing the remediation and prevention program in Kenya, as outlined in the MAP.

B.2. Stakeholder Engagement Plan

12. As a first step in program development, the project team developed a Stakeholder Engagement Plan (SEP) outlining the proposed approach for engagement with survivors, the government of Kenya, UN agencies, and local and international nongovernmental organizations. The SEP was shared with the CAO for feedback on May 3, 2024, and sent to the Board for information on May 30, 2024. The SEP outlined a clear approach to enable survivors in general and survivors from a Bridge school setting in particular to be consulted in a manner that is safe and consistent with the UN Women consultation guidelines.

B.3. UN-led stakeholder consultations to inform program development

13. To implement the SEP, the project team selected two UN agencies, the United Nations Population Fund (UNFPA) and the United Nations Children’s Fund (UNICEF), to help IFC conduct stakeholder consultations in Kenya, following the WBG’s competitive procurement policies and procedures. UNFPA brings expertise in GBV, stakeholder consultations, and community engagement in Kenya, while UNICEF adds expertise around child protection, mental health and psychosocial support, justice for children, and an extensive network of county-level partners in Kenya. IFC engaged both agencies to conduct consultations according to global standards for GBV prevention and response, following a survivor-centered approach.⁵
14. UNFPA and UNICEF engaged a diverse and expansive group of key stakeholders at national and county levels across 26 counties, despite the consultations being disrupted due to the protests in Kenya in August. The counties were selected based on GBV and CSEA prevalence rates and the presence of Bridge schools. A total of 654 stakeholders participated. This included 245 duty-bearers, comprising key government officials and justice sector representatives. Among them were national and county gender directors, education directors, court users committee members, magistrates, police officers, and representatives from the Office of the Director of Public Prosecutions (ODPP). Additionally, national government administration officials like county commissioners, chiefs, GBV county coordinators, and NGOs providing GBV and CSEA services, who represent countless survivors, were also consulted in this group. Furthermore, 309 community members participated in the consultations, including community leaders, elders, religious

⁵ A survivor-centered approach is based on the four GBV guiding principles of safety, confidentiality, non-discrimination and respect.

leaders, and representatives from civil society organizations (CSOs). These participants encompassed heads of teachers' associations, parent leaders, school management committee members, faith-based organization representatives, and grassroots GBV responders. A total of 100 survivors and survivor networks additionally were consulted, including a dedicated session with the four Bridge complainants on November 10, 2024. UNFPA hired the Wangu Kanja Foundation (WKF) to lead the survivor outreach and provide mental health support during consultations. WKF, with a presence in every county in Kenya, worked further with local organizations to enable survivors to participate. WKF, as the chair of the Survivors Networks in Kenya, has the means to safely engage survivors who are willing to engage. The Bridge referral network was also leveraged to help disseminate information about the consultations to any survivors they may work with.

15. In early October 2024, UNFPA and UNICEF held a validation workshop with national-level stakeholders whose contributions informed the stakeholder consultation process. The validation workshop served as a key platform to review and verify findings of the national consultation processes. Participants included representatives from government ministries, public sector agencies (judicial, health, education, justice, police), service providers, WKF, and other organizations working directly with survivors. The consultations' findings are informing the design of the IFC program, which will be discussed with the Advisory Committee (see section C.6 below) and is expected to be presented to the Board in June 2025.

B.4. Engagement with the Government of Kenya, local CSOs, and other stakeholders

16. As a key stakeholder, the government of Kenya participated in the UN-led consultations and has met regularly with IFC regional management. The government recognizes the gravity of GBV and child sexual abuse issues and acknowledges that such issues are not unique to Bridge schools or educational settings. The government is already working on these challenges with several development partners, including UN agencies and has had a joint multiyear program since 2010 to tackle this deeply entrenched issue. In April 2024, IFC's Regional Director for Eastern Africa met with the Kenyan Government Advisor on Women's Rights to discuss the government's GBV prevention programming and our efforts to develop the remediation and prevention program in Kenya, as outlined in the MAP. In November 2024, IFC's Regional Director for Eastern Africa met with the Ministry of Gender and the Ministry of Labor and Social Protection (which includes the Child Protection Directorate) to learn more about their work in the country as well as to provide updates on the progress of stakeholder consultations and program design. Follow-up meetings will be arranged once the program structure is further advanced.
17. The project team continues to cultivate relationships with various stakeholders (e.g., UN agencies, government bodies, local CSOs) to further enhance a comprehensive understanding of the local operating environment. Local CSOs reiterated the prevalence of GBV in Kenya, its endemic nature in schools and the broader community, and that it would be imperative for IFC to collaborate with local GBV service providers with a deep understanding of the local context to inform design and delivery of the program. Additionally, the team is drawing upon expertise from across the World Bank Group (WBG) and other project implementation programs to learn from their experiences in consultation processes, program design, and advisory committee formation.

B.5. Engagement with the four CSOs representing the Bridge complainants

18. On August 9, 2024, the CAO published its Compliance Appraisal Report for the four complaints against Learn Capital Venture Partners III. Each of the four Learn Capital complaints was brought by a former student at a Bridge International Academies school. Following its Compliance Appraisal, the CAO decided

to merge these complaints with the ongoing Bridge 04 monitoring process. These four former students are represented by Accountability Counsel, Inclusive Development International, Oxfam and the Wangu Kanga Foundation (“the Complainant Representative CSOs”).

19. IFC invited engagement with the four former Bridge students, and the CSOs that represent them, from the moment it became aware of their complaints. IFC respected their wishes not to meet with IFC staff directly. Instead, IFC has met regularly with the Complainant Representative CSOs. These meetings started even before their formal designation by the CAO as complainant representatives. On May 28, 2024, IFC met with the four CSOs to discuss the SEP preparations. On July 29, 2024, IFC’s Regional Director for Eastern Africa and Global Director for Gender & Inclusion met with the four CSOs to enable UNFPA and UNICEF to brief them on the stakeholder engagement process and to solicit their views on consulting the four Bridge complainants and potentially other survivors from a Bridge school setting.
20. Following the CAO’s decision in August 2024 to merge the Learn Capital and Bridge 04 case, IFC immediately reached out to the Complainant Representative CSOs to further seek their views on the best approach for gathering the Bridge complainants’ perspectives to inform the MAP implementation, leading to a meeting on September 11, 2024.⁶ Based on the former Bridge students’ availability, a dedicated consultation session with the four Bridge complainants took place on November 10, 2024, led by UNFPA.⁷ In December 2024, a summary of the Bridge complainants’ consultation report was shared confidentially with the CSOs. The perspectives of the Bridge complainants were included in the full consultations report, which was shared with the CSOs in January 2025.
21. During the most recent meeting with the four CSOs on January 16, 2025, the CSOs requested that IFC extend consultations to identify and speak with more Bridge complainants. Due to confidentiality, neither the CSOs nor IFC know if any of the survivors already consulted are survivors from a Bridge school setting beyond the four Bridge complainants, as they were not asked to self-identify in accordance with GBV consultation protocols. On February 7, 2025, IFC organized a workshop in Nairobi with CSOs, led by a UN inter-agency GBV expert who was not involved in the UN stakeholder consultations. The workshop aimed to raise awareness about how safe GBV consultations are conducted and related good practices. It also included discussion of the request to seek out additional Bridge complainants as part of the stakeholder consultation, with a view to determining if this exercise could be achieved safely and in line with UN Women guidelines for consultations with survivors of violence against women and girls. The GBV specialists and the UN inter-agency GBV expert made clear during the discussion that targeting additional, unidentified survivors from a Bridge school setting for further consultations would be unsafe. Accordingly, the meeting explored reaching out to adult survivors of sexual abuse in schools instead. The CSOs also requested that IFC consider further consultations with additional education stakeholders, such as teacher networks and their support systems.
22. IFC agreed to engage UNFPA to conduct additional consultations with adult survivors of sexual abuse in schools and with education sector providers. These consultations will continue to adhere to UN Women guidelines to protect the safety and well-being of the survivors. The original UNFPA team has been procured under the WBG procurement guidelines to conduct these further consultations. Consequently, the

⁶ CAO notified IFC that it merged the Learn Capital complainants with Bridge 04 on August 14, 2024. On August 15, 2024, IFC contacted the CSO representatives to help us organize consultations of the Bridge complainants.

⁷ Neither IFC nor the CAO was present at the consultation.

program design timeline has been adjusted, with the program now expected to be ready for Board submission in June 2025.

C. Strengthening Management of GBV/CSEA Risks in IFC's Investments

C.1. IFC portfolio review

23. The IFC Portfolio Review has been completed. The review aimed to identify child sexual abuse and GBV risks in IFC's investments and determine appropriate risk management measures. IFC screened its entire active investment portfolio and selected a prioritized sub-group in sectors with higher risks of gender-based violence and harassment (GBVH) and child protection issues for an in-depth review. This review included desk reviews and client surveys to identify clients needing focused GBVH and child protection risk supervision visits. All site supervisions have been completed, and IFC has developed corrective action plans as needed. An anonymized summary report will be shared with CAO on a strictly confidential basis in Q4 2025.

C.2. Client reporting obligations

24. IFC has established new incident reporting obligations for clients. IFC updated legal covenants in its investment agreement templates with sexual exploitation, abuse, and harassment (SEAH), child protection incident reporting, and sexual harassment policy obligations for new investments. In preparation for the rollout, eight global webinars have been conducted for investment officers and E&S specialists across offices. Additional training has been provided to E&S specialists on their specific role in including the covenants in the documentation for new investments. The investment agreement templates with the new covenants were rolled out in the first week of March 2025.

C.3. GBV in-house expertise

25. IFC enhanced its GBV expertise. It expanded in-house GBV capacity with five new regional GBV specialists – two for Africa; one for the Central and South America regions; one for the Middle East/Central Asia and Europe regions; and one covering the South Asia and East Asia/Pacific regions. One of these GBV specialists is part of the Bridge 04 MAP implementation team. All staff are onboard as of FY25. In addition, a senior Child Protection consultant joined in May 2024.
26. Outside of the MAP commitments, IFC has established a gender-based violence (GBV) hub in Nairobi to initiate and promote programs designed to strengthen the private sector's response to preventing and addressing GBV.

C.4. New tools and training

27. To strengthen IFC capacity and deepen the uptake of good international industry practices, several actions are being rolled out. Management has increased messaging and awareness of GBV risks, emphasizing the prompt escalation of issues to enable timely responses by GBV specialists. New GBV tools and training have been finalized and are in the process of being implemented. In August 2024, ESG360, the new internal E&S IT platform, launched an updated mandatory GBV risk screening module for due diligence, which has also integrated child protection risk screening. A dashboard to enable monitoring and follow-up by the GBV team is under development and will be operational in FY26.

28. E&S due diligence questionnaires and reporting templates, such as the Annual Monitoring Report, have been updated to explicitly include child protection risks and systematic reporting of any GBV and child safeguarding incidents. Trainings on child safeguarding for staff took place in April, October, and November 2024 to complement the annual E&S training program on gender and GBV, which will continue to occur every year. For financial intermediaries (FI) clients, two GBV awareness-raising webinars took place in March 2024 and are continuing under the planned corporate training program. Resources for FI clients have been published on IFC's [FIRST for Sustainability](#) website.
29. Training materials for new regional GBV consultants' workshops are ready for delivery in FY26. These workshops will create an external roster of pre-screened GBV consultants trained in IFC Performance Standards and private sector practices to support clients in multiple countries. For clients and the broader private sector, the Good Practice Note on Child Safeguarding in Business will be reviewed by the Advisory Committee before it is published externally. It complements the 2020 Good Practice Note on Addressing GBVH in the Private Sector (IFC, EBRD, and BII, 2020).
30. For IFC Nominee Directors, as of October 2023, E&S risk review is included as a mandatory item in onboarding for new Nominee Directors. The first two training sessions on GBV Risk Governance for Nominee Directors took place in January and June 2024. These sessions now occur at every new intake of directors and are followed by an annual refresher.

C.5. Advisory Committee

31. IFC formed an independent Advisory Committee which commenced meetings in August 2024. The committee is led by two co-chairs and is supported by an Advisory Committee Secretariat. The committee members were selected by IFC, working jointly with the World Bank's Director for Environmental & Social Standards. Criteria included the following: over 10 years of experience working on GBV, child sexual abuse prevention, or survivor services; expert knowledge of relevant global good practice standards including survivor-centered principles; strong analytical skills; and demonstrated empathy and sensitivity towards survivors.
32. In February 2025, two new members joined the Advisory Committee: one to replace an external member who resigned due to her increasing work commitments and another from a Kenyan NGO to add more local representation, as requested by the Advisory Committee. The Advisory Committee includes seven external experts and one WBG staff member. The WBG member is non-voting and ex-officio.
33. The Committee holds monthly virtual meetings. An in-person meeting was held in late October 2024 in Kenya. The Advisory Committee discussed early program design options and provided feedback and guidance to IFC and the UN agencies. Going forward, the Advisory Committee will review the Good Practice Note on Child Safeguarding (GPNCP) as well as the program design.

III. UPDATE ON MAP IMPLEMENTATION ACTIONS

34. The following table contains current information on the two components of the MAP – developing a remediation and prevention program in Kenya; and strengthening management of gender-based violence (GBV), including child sexual abuse, risks in IFC's investments. The table includes updates on the deliverables and their implementation status.

Area of Improvement	Action / Activity & Responsibility	Deliverable/Expected Outcome & Timeframe	Summary of Implementation Status
IN-COUNTRY REMEDIATION AND PREVENTION PROGRAM			
<p>A. Remediation for survivors of child sexual abuse.</p>	<p>Action A.1. IFC will directly fund a remediation program (subject to design, evaluation, and milestones) – referred to by CAO as emergency child protection response (ECPR) – for survivors of child sexual abuse in counties where Bridge operated or currently operates in Kenya.</p> <p>..... Responsibility: IFC/ Implementation partner</p>	<p>A.1.a. Project Preparation Plan for the design phase Stakeholder engagement / community consultation plan The stakeholder engagement plan will be survivor-centered and will include a protocol on safe and ethical consultation with survivors of child sexual abuse, should they wish to participate. Mapping / Service-gap analysis Situational analysis Selection of implementation partner/s Implementation plan Logistics plan Timeframe: 6 months from the start, subject to the required (including government) approval process</p>	<p>Status: UN consultations have been completed. Additional consultations are being planned to reach more survivors of child sexual abuse in schools and education stakeholders, following a request from the four CSOs representing the Bridge complainants.</p> <p>..... Project preparation completed; service mapping completed in FY24; desk review and situational analysis completed in FY24; implementation partners selected in accordance with World Bank Group procurement policies (UNFPA and UNICEF); a comprehensive stakeholder engagement implementation plan completed in Q1 FY25. The consultations findings are informing the program, which is planned to be finalized by June 2025.</p>
		<p>A.1.b. Implementation Technical guidance materials Service protocols Information, education and communications materials Timeframe: Over the lifespan of the program</p>	<p>Technical guidance materials related to stakeholder consultations completed in Q1 FY25. Other program resource materials will be developed after confirmation of the program design, during the startup phase of the new program commencing in Q2 FY26.</p>
		<p>A.1.c. Results Framework Timeframe: FY25 <i>Mid-term review - FY26/27</i> <i>Final evaluation - FY27</i> <i>(indicative dates to be adjusted based on the final design of the program)</i></p>	<p>The results framework will be developed after the program is finalized and will be an expected part of the first phase of program implementation in Q2 FY26.</p>
		<p>A.1.d. Sustainability, Transfer and Exit Strategy Transition /exit plan Timeframe:</p>	

Area of Improvement	Action / Activity & Responsibility	Deliverable/Expected Outcome & Timeframe	Summary of Implementation Status
		<i>Midterm review - FY26/27</i>	

Area of Improvement	Action / Activity & Responsibility	Deliverable/Expected Outcome & Timeframe	Summary of Implementation Status
<p>B. Strengthening community response to child sexual abuse and GBV against children within project communities.</p>	<p>Action B.1. Design “prevention” activities aiming to engage local communities and services in counties in Kenya where Bridge operated or currently operates, to strengthen prevention and outreach to populations at risk of child sexual abuse and GBV. Prevention interventions will be contextually adapted to the local context and designed via participatory methods in accordance with evidence-based good practices.</p> <p>Responsibility: IFC/ Implementation partner</p>	<p>B.1.a. Plan of Action: Outline of prevention interventions using participatory methods Timeframe: FY26</p>	<p>The consultations findings are informing the prevention component of the program, which is planned to be finalized by June 2025.</p>
		<p>B.1.b. Training of community facilitators/mentors Timeframe: FY26</p>	
		<p>B.1.c. Implementation (as outlined in Action A.1) Timeframe: Over program lifecycle <i>Timelines as per Action A.1. (indicative dates to be adjusted based on the final design of the program)</i> Implementation Plan - FY26 Mid-term review - FY27 Final evaluation - FY28 Transition /exit plan: Subject to review in FY27/28</p>	

Area of Improvement	Action / Activity & Responsibility	Deliverable/Expected Outcome & Timeframe	Summary of Implementation Status
INSTITUTIONAL STRENGTHENING			
<p>C. Portfolio review to identify all projects where children are a vulnerable and disadvantaged subset of affected communities to identify and assess if appropriate social risk management measures are in place and operationalized.</p>	<p>Action C.1. Undertake a review of its portfolio to identify child sexual abuse and GBV risks in investments and determine appropriate risk management measures when needed. Responsibility: IFC</p>	<p>C.1.a. Summary Report Note: Report will be for internal IFC use only and shared with CAO on a strictly confidential basis. Progress under the portfolio review will be included in the first progress report on MAP implementation, presenting summarized results in a way compliant with the Access to Information Policy. Timeframe: Q2 FY25</p>	<p>Status: Completed The portfolio review has been finalized. IFC will share an anonymized confidential summary report with CAO.</p>
	<p>Action C.2. Review the E&S provisions included in template investment agreements and develop covenants to be included where appropriate in relation to (i) prevention of GBV and child safeguarding / child protection measures for inclusion as relevant where the risk is identified during due diligence; and (ii) notification by clients to IFC of GBV and child safeguarding incidents. Responsibility: IFC</p>	<p>C.2.a. Updated investment agreement templates. Timeframe: FY25</p>	<p>Status: Completed – March 2025 IFC updated legal covenants in investment agreement templates with SEAH, child protection incident reporting, and sexual harassment policy obligations for new investments. Staff have been trained. The investment agreement templates with the new covenants were rolled out in the first week of March 2025.</p>
	<p>Action C.3. Update existing gender and GBV project risk screening methodology and relevant guidance to E&S specialists to (i) include child protection risk screening; (ii) digitalize the tool to facilitate systematic usage by project team; (iii) increase functionality to enable systematic dashboard monitoring and follow up with project team; and (iv) strengthen systematic and mandatory implementation of a risk-based approach regarding GBV and child sexual abuse prevention and response during E&S due diligence and portfolio monitoring throughout the project cycle. Responsibility: IFC</p>	<p>C.3.a. Updated gender and GBV project risk methodology to include child protection. Actions on GBV and child sexual abuse methodology, digitalization, and guidance. Timeframe: Q1 FY25</p>	<p>Status: In Progress/FY26 GBV project risk screening methodology and accompanying guidance for E&S specialists have been updated to include child protection risk screening. In August 2024, the GBV Risk Screening tool and GBV questionnaire for direct investments were integrated into the ESG platform – ESG360. This integration will enable systematic identification and management of GBV/child safeguarding risks throughout the project cycle. Contextualization of the GBV Risk Screening tool and GBV questionnaire targeting</p>

Area of Improvement	Action / Activity & Responsibility	Deliverable/Expected Outcome & Timeframe	Summary of Implementation Status
			<p>FIs have been developed for rollout.</p> <p>A dashboard to enable monitoring and follow-up by the GBV team is under development and will be operational in FY26.</p>
	<p>Action C.4. Review and update E&S due diligence questionnaires and reporting templates (such as the annual monitoring report) to explicitly include child sexual abuse (GBV is already included) and systematic reporting of any GBV and child safeguarding incidents. The questionnaires and the reporting templates will explicitly specify reporting to be survivor-centered, confidential and child-sensitive.</p> <p>.....</p> <p>Responsibility: IFC</p>	<p>C.4.a. Updated questionnaires and annual monitoring templates to include child safeguarding.</p> <p>.....</p> <p>Timeframe: Q1 FY25</p>	<p>Status: Completed - Q1 FY25</p> <p>.....</p> <p>GBV questionnaires and annual monitoring templates have been updated to include child safeguarding. Additional guidance and training accompanied the rollout for E&S specialists.</p>
	<p>Action C.5. Issue and operationalize a statement to staff on zero tolerance for inaction on or reprisals relating to addressing GBV or child protection issues.</p> <p>.....</p> <p>Responsibility: IFC</p>	<p>C.5.a. Statement</p> <p>.....</p> <p>Timeframe: FY24</p>	<p>Status: Completed – FY24 and operationalization in January 2025</p> <p>.....</p> <p>Message from Ajay Banga to World Bank Group staff, “Learning from Mistakes” and from Makhtar Diop on “Bridge: The Work Ahead”</p> <p>IFC updated its E&S Review Procedures (ESRP) with step-by-step guidance on how to respond to significant adverse E&S events in January 2025.</p>

Area of Improvement	Action / Activity & Responsibility	Deliverable/Expected Outcome & Timeframe	Summary of Implementation Status
<p>D. Undertake institution-wide capacity building efforts to prevent child sexual abuse and overlapping forms of GBV from occurring in its investment projects.</p>	<p>Action D.1. IFC will anchor its activities to address GBV, including child sexual abuse in Kenya, through the hiring of a GBV specialist and collaboration with the Nairobi-based World Bank specialists. Additional GBV specialists will be recruited in Asia, Latin America and Middle East/Central Asia/Europe. Staff positions will be complemented by experts under short-term contracts.</p> <p>Responsibility: IFC</p>	<p>D.1.a. Increase GBV specialist staffing</p> <p>Timeframe: Q4 FY24</p>	<p>Status: Completed - August 2024</p> <p>Current in-house GBV expertise (one global GBV lead) has been enhanced with five new regional GBV specialists (two in Africa, one in Latin America, one in Middle East/Central Asia/Europe, and one in Asia). All staff are onboard. In addition, a Senior Child Protection Consultant was hired.</p>
	<p>Action D.2. IFC will deliver the following capacity building actions:</p> <ul style="list-style-type: none"> • Develop and deliver an ongoing mandatory training and sensitization program for all IFC staff with project responsibilities, including materials contextualized for sectors and regions as needed, to build capacity in identifying and addressing child sexual abuse and GBV risks in IFC projects. This also involves leadership commitment to ensure capacity building efforts are systematized institutionally. • To support clients and the promotion of good practices, IFC will roll out its regional external GBV specialist consultant competency-based program and roster so that a pre-identified network of local GBV consultants is available at country and regional levels. <p>Responsibility: IFC</p>	<p>D.2.a. Annual training plan</p> <p>Timeframe: Q1 FY25</p> <p>D.2.b. Regional external GBV consultants' workshops</p> <p>Timeframe: FY25</p>	<p>Status: In Progress / FY26</p> <p>D.2a. - IFC finalized an annual training plan which includes mandatory training for IFC staff. Development of training resources and implementation will be rolled out in FY26. Several training sessions have already taken place:</p> <p>Staff: Training on child safeguarding for staff took place in April, October, and November 2024. This complements annual E&S training on gender and GBV.</p> <p>FI Clients: Two GBV awareness raising webinars for FI clients took place in March 2024 and are continuing under the planned corporate training program. In addition, resources for FI clients have been published on IFC's FIRST website.</p> <p>D.2.b. - IFC has finalized the resource and training package and completed the pilot of the first regional training for the IFC regional external GBV specialist consultant program. The new regional GBV specialists were briefed on this</p>

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	<p>Action D.3. IFC will develop the following tools and guidance:</p> <ul style="list-style-type: none"> • A Good Practice Note on Child Safeguarding in Business for external publication, harnessing IFC’s standard-setting influence across multilateral financial institutions and in the marketplace. The Note will take an intersectional approach inclusive of the multiple vulnerabilities and sources of discrimination that should be considered (e.g., age, gender and sexual orientation, disability). • Launch an IFC GBV Company Diagnostic Tool to support implementation of the Good Practice Note: Addressing GBV and Harassment: Emerging Good Practices in the Private Sector. • Provide guidance to IFC Nominee Directors, using the Tip Sheet: Guidance for Boards of Directors on Overseeing Gender-Based Violence and Harassment Risk. <p>Responsibility: IFC</p>	<p>D.3.a. Good Practice Note on Child Safeguarding in Business</p> <p>Timeframe: FY25</p> <p>D.3.b. GBV Company Diagnostic Tool</p> <p>Timeframe: FY25</p> <p>D.3.c. Guidance to IFC Nominee Directors</p> <p>Timeframe: FY24 and ongoing for new Nominee Directors as they join</p>	<p>deliverable and will receive a train-the-trainer course to equip them to roll out the training across regions in FY26.</p> <p>Status: In Progress / Q4 FY25</p> <p>D.3.a. - The new Good Practice Note on Child Safeguarding in Business will be reviewed by the Advisory Committee. Expected publication in Q4 FY25.</p> <p>D.3.b. - The technical content and piloting of the GBV Company Diagnostic Tool has been finalized. It will be digitalized before publication. Expected launch in FY26. In the interim, the non-digital version is still being used with clients as part of IFC’s E&S advisory support.</p> <p>D.3.c. - Since October 2023 new IFC Nominee Directors receive guidance on E&S risk review. The first two targeted training sessions on GBV Risk Governance for Nominee Directors took place in January and June 2024. These are now occurring at every new intake of directors and are followed by an annual refresher. The IFC Guidance for Boards of Directors on Overseeing GBVH was distributed.</p>

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<p>E. Establish a global GBV task force to advise IFC on strengthening its approach to identifying and managing GBV across its investments, including supporting the implementation of the recommendations detailed above.</p>	<p>Action E.1. IFC will set up an Advisory Committee including relevant international and local GBV and child protection experts, both external and internal and external, to support the design and implementation of the Remediation and Prevention Program in Kenya, and the development of the Good Practice Note on Child Safeguarding in Business.</p> <p>.....</p> <p>Responsibility: IFC</p>	<p>E.1.a. Advisory Committee in place and functioning.</p> <p>.....</p> <p>Timeframe: Q4 FY24</p>	<p>Status: Completed - August 2024</p> <p>.....</p> <p>Advisory Committee was launched on August 1, 2024, co-chairs were appointed, a work plan agreed, and a Secretariat established to support the Advisory Committee.</p>

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