

**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**

**October 7, 2024**

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## **ABBREVIATIONS AND ACRONYMS**

CAO	Office of the Compliance Advisor Ombudsman
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. In August 2024, CAO merged the Learn Capital cases with Bridge 04: [Learn Capital 04 Compliance Appraisal Report](#). CAO found that the complaint is substantially related to the issues investigated under the Bridge 04 compliance process.
4. The Board-approved MAP for Bridge 04 has two components: (1) an in-country remediation and prevention program; and (2) institutional strengthening to manage gender-based violence (GBV), including child sexual abuse risks, in IFC's investments.

## **II. MAP IMPLEMENTATION STATUS**

5. This update fulfills IFC's commitment to report to the Board on the progress in the implementation of the approved Bridge 04 MAP within six months of its approval. IFC has made significant and substantive progress on both systemic improvements and the design of the remediation program. Two specialized United Nations agencies were onboarded to implement the consultations with stakeholders and survivors in line with best practices and global standards for GBV prevention and response. Although the pace of activities in Kenya was affected by protests in the country in late June, July and August 2024, activities accelerated as the situation improved and the consultations are now expected to be completed in October. IFC will be ready to engage with the Board on the preferred program implementation option by the end of 2024.
6. Key achievements in Kenya have been the establishment of a dedicated project; engagement with key stakeholders; completion of the stakeholder engagement plan as the basis for stakeholder consultations; hiring of United Nations (UN) agencies to implement the consultations; and wide consultations with various stakeholder groups in Kenya, including survivors, the government, civil society organizations (CSOs), and strategic partners. Consultations with Learn Capital complainants are expected to conclude in October.
7. In parallel, IFC made solid progress on all institutional strengthening actions, which are aimed at enhancing internal accountability, fostering a culture that recognizes GBV issues as inherent to complex business environments, and improving management of such issues. All actions are either completed or nearing completion. Staff are expected to report any serious environmental and social (E&S) issues of

which they become aware in projects supported by IBRD/IDA, MIGA or IFC. To formalize this expectation, IFC is preparing changes to its operational procedures to reflect a zero-tolerance policy for staff inaction, commonly known as the “see something, say something” policy. E&S due diligence platforms, such as ESG360,<sup>1</sup> have been put in place and will continue to be improved as these new tools are institutionalized. Enhanced staff training plans have been developed and will continue to be delivered regularly.

8. 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 maintaining a deep commitment to safeguarding vulnerable populations, particularly children, and addressing instances of GBV and child sexual abuse. 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 to get them resolved, as well as steps that are being taken to better equip operational teams to handle these sensitive matters, based on a zero-tolerance approach. IFC will continue to build on the lessons learned from this case to foster a culture of accountability, learning, and proactive engagement.

## **A. In-country Remediation and Prevention Program**

### ***A.1. Project team***

9. IFC established a project team comprised of a project lead and two GBV specialists, with additional support from Gender, CSO Engagement and Communications colleagues (total equivalent to four staff). The team is overseen by two Vice Presidents and has close involvement from three directors..

### ***A.2. Engagement with the Government of Kenya and local stakeholders***

10. The Government of Kenya is a key stakeholder participating in consultations and program design. The Government recognizes the gravity of GBV/child sexual abuse issues, as reflected in its national surveys, and acknowledges that such issues are not unique to Bridge schools or educational settings. The Government is already working with several development partners, including UN agencies, on these challenges and has had a multiyear program since 2010 to tackle this deeply entrenched issue.
11. The project team is forging strategic alliances with UN agencies, government bodies, CSOs, and other key stakeholders to cultivate robust relationships and further enhance a comprehensive understanding of the local operating environment. The local CSOs reiterated the prevalence of GBV in Kenya, its endemic nature in schools and the broader community, and the imperative for IFC to collaborate with local GBV service providers with a deep understanding of the local context. The team has drawn 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.

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<sup>1</sup> ESG360 is an internal rating tool that integrates assessment of various Risks, Client Performance and Outlook components to generate more granular and accurate ESG Risk Ratings. Also, ESG360, as a one-stop shop, brings all ESG system functions onto one platform, thereby removing system redundancies and inefficiencies.

### ***A.3. Stakeholder Engagement Plan***

12. As an initial step in developing the Kenya Remediation and Prevention Program, the project team created a Stakeholder Engagement Plan (SEP) outlining the proposed approach for engagement with survivors, government, UN agencies, and international nongovernmental organizations. The project team shared the SEP with CAO for comments on May 3, 2024, and sent it to the Board for information on May 30, 2024. The SEP explicitly provides opportunities for Bridge survivors to anonymously participate in consultations.

### ***A.4. Hiring of the implementing partners***

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 support IFC with conducting stakeholder consultations in Kenya, which will inform the project’s design. UNFPA and UNICEF were selected 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. The two UN agencies IFC selected are the best in their field; IFC decided to engage them both to ensure that it has the best expertise available to ensure that consultations are conducted according to best practices and global standards for GBV prevention and response and follow the survivor-centered approach.<sup>2</sup>

### ***A.5. Implementation of stakeholder consultations***

14. UNFPA and UNICEF launched the stakeholder consultations on August 2, 2024, with national-level stakeholders and then in selected counties, per the agreed plan. In all, UNFPA and UNICEF held consultations in 26 counties in Kenya between August 2 and September 16, 2024. This work began late due to the protests in Kenya. Additionally, due to the August 2024 CAO decision to merge the Learn Capital 04 cases with Bridge 04, IFC must also consult the complainants of the Learn Capital case (see A.6. below).
15. After the consultations, UNFPA and UNICEF will hold a validation workshop in early October 2024, with stakeholders who helped design the consultation process to share the findings of the consultations. This will inform the design of the IFC program, which will be discussed with the Advisory Committee (see section B.5 below) and is expected to be shared with the Board by the end of 2024.

### ***A.6. Meetings with four advocacy CSOs***

16. Four CSOs (the Wangu Kanga Foundation and three international CSOs – Inclusive Development International, Accountability Counsel, and Oxfam) presented themselves as representatives of the four Learn Capital complainants. The project team met with them virtually on May 28, 2024, and in person in Nairobi on July 29, 2024. This latter meeting was also attended by the two UN agencies to provide information on the consultation process, and a follow up meeting is planned for mid-October in Nairobi.

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<sup>2</sup> A survivor-centered approach is based on the four GBV guiding principles of safety, confidentiality, non-discrimination and respect.

17. On August 9, the CAO published its report merging the Learn Capital 04 cases with Bridge 04, with the four CSOs as official representatives of the Learn Capital complainants. As a matter of policy, IFC is required to consult the Learn Capital complainants. On September 11, IFC held a meeting with the four CSOs to determine the best approach for gathering the complainants' views to inform the program design. The project team is working to organize these consultations within the scope of the ongoing stakeholder consultations by early October 2024.
18. Following the completion of stakeholder consultations, the project team will implement activities to:
  - Support completion of the work leading to program design;
  - Consider program options based on the outcome of the stakeholder consultations conducted by UNFPA and UNICEF, good practice, existing services, and with the goal to maximize IFC intervention impact, and select a program option for implementation; and
  - Execute the procurement process for selecting the program implementation vendor/partner.

## **B. Institutional Strengthening**

### ***B.1. IFC Portfolio review***

19. The IFC Portfolio Review, aimed at identifying child sexual abuse and GBV risks in IFC's investments and determining appropriate risk management measures, is well advanced. All remaining K-12 investments by IFC have been assessed. Additionally, IFC conducted a preliminary screening of its entire active direct investment portfolio, comprising approximately 2,000 clients. From this, a prioritized sub-group of clients in sectors with higher gender-based violence and harassment (GBVH) and child protection risks was selected for an in-depth review. This review utilized a combination of desk reviews and client surveys, identifying clients (excluding those already under GBVH supervision) that required focused GBVH and child protection risk supervision visits. Most of these site supervisions have been completed, and IFC is working with the clients to develop corrective action plans where necessary. A summary report will be shared with CAO on a strictly confidential basis by the end of 2024.

### ***B.2. Client reporting obligations***

20. IFC has developed new client incident reporting obligations. 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. The obligations are being rolled out in conjunction with training for E&S specialists on their implementation.

### ***B.3. GBV in-house expertise***

21. GBV expertise has been enhanced. In-house GBV capacity (one global GBV lead) has been expanded with five new regional GBV specialists – two in Africa, one in Latin America and the Caribbean region, one in the Middle East/Central Asia/Europe region, and one in Asia. All staff are onboard as of FY25.

In addition, a Senior Child Protection Consultant joined in May 2024 to support the implementation of the institutional actions in the MAP.

#### ***B.4. New tools and training***

22. New GBV tools and training have been implemented for IFC staff, clients and IFC Nominee Directors and new requirements are being considered to enhance IFC’s culture of accountability. Increased messaging by management and awareness of GBV risks has already led to more prompt escalation of issues, enabling enhanced response by GBV specialists.

- For staff: The first training on child safeguarding<sup>3</sup> took place in April 2024 to complement the annual E&S training program on gender and GBV. In August, the new E&S information technology platform, ESG360, launched an updated mandatory GBV risk screening module for due diligence, which has also integrated child protection risk screening. The GBV and child protection risk screening module has been contextualized specifically for financial intermediaries.
- For staff: Staff are expected to report any serious E&S issues that they become aware of in projects supported by the World Bank Group. To formalize this expectation, IFC is preparing changes to its operational procedures to reflect a zero-tolerance policy for staff inaction, commonly known as the “see something, say something” policy. IFC is also planning a mandatory training to improve understanding of this zero-tolerance policy and staff roles in properly addressing complaints and allegations of harm or reprisals.
- For clients: Two GBV awareness-raising webinars for financial intermediaries (FI) clients took place in March 2024 and will continue under the planned corporate training program.
- For broader private sector and clients: The Good Practice Note on Child Safeguarding in Business will be published externally in December 2024, building on the 2020 Good Practice Note on Addressing GBVH in the Private Sector (IFC, European Bank for Reconstruction and Development and CDC Group, 2020).
- 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 will occur at every new intake of directors and will be followed by an annual refresher.

#### ***B.5. Advisory Committee***

23. The Bridge 04 MAP proposed the creation of an Advisory Committee to support IFC’s activities and advise on the design and implementation of the Remediation and Prevention Program in Kenya within the parameters outlined in the MAP.

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<sup>3</sup> The terms “child protection” and “child safeguarding” are both used in this document. UNICEF distinguishes them as follows: child protection is the prevention of, and response to, exploitation, abuse, neglect, harmful practices and violence against children. Child safeguarding refers to proactive measures taken to limit direct and indirect collateral risks of harm to children.



24. The Advisory Committee has been formed. It includes six external experts and two WBG staff members. The committee members were selected by IFC, working jointly with the World Bank’s Director for Environmental & Social Standards. Criteria included: 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. The committee co-chairs were appointed, and upcoming work is planned, supported by an Advisory Committee Secretariat. Monthly virtual meetings commenced in August and an in-person meeting is planned for late October in Kenya.
25. In the upcoming period, the project team will undertake or oversee the following activities to:
- Finalize the IFC GBV Portfolio Review and draft a Summary Report;
  - Publish a new Good Practice Note on Child Safeguarding in Business;
  - Publish a GBV Company Diagnostic Tool; and
  - Execute the annual training plan for IFC staff, external GBV consultants, and Nominee Directors.

### **III. UPDATE ON MAP IMPLEMENTATION ACTIONS**

26. The following table contains current information on the two components of the MAP – the in-country Remediation and Prevention Program and the institutional strengthening measures to manage GBV, including child sexual abuse risks. The table includes updates on the deliverables, their status, and a summary of implementation.

Area of Improvement	Action / Activity & Responsibility	Deliverable/Expected Outcome & Timeframe	Summary of Implementation & Status
<b>IN-COUNTRY REMEDIATION AND PREVENTION PROGRAM</b>			
<p><b>A.</b> Remediation for survivors of child sexual abuse.</p>	<p><b>Action A.1.</b> 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>.....</p> <p><b>Responsibility:</b> IFC/ Implementation partner</p>	<p><b>A.1.a. Project Preparation Plan for the design phase</b></p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Mapping / Service-gap analysis</li> <li>• Situational analysis</li> <li>• Selection of implementation partner/s</li> <li>• Implementation plan</li> <li>• Logistics plan</li> </ul> <p>.....</p> <p><b>Timeframe:</b> 6 months from the start, subject to the required (including government) approval process</p>	<p><b>Status: In progress albeit delayed due to protests in Kenya that started in late June and lasted until the end of August.</b></p> <p>.....</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; a comprehensive stakeholder engagement implementation plan completed in Q1 FY25. Program design will be based on the outcome of the consultations and is planned to be finalized by end CY2024.</p>
		<p><b>A.1.b. Implementation</b></p> <ul style="list-style-type: none"> <li>• Technical guidance materials</li> <li>• Service protocols</li> <li>• Information, education and communications materials</li> </ul> <p>.....</p> <p><b>Timeframe:</b> 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 Q3 FY25.</p>
		<p><b>A.1.c. Results Framework</b></p> <p>.....</p> <p><b>Timeframe:</b> FY25</p> <p><i>Mid-term review - FY26/27</i></p> <p><i>Final evaluation - FY27</i></p> <p><i>(indicative dates to be adjusted based on the final design of the program)</i></p>	<p>The results framework will be developed after confirmation of the selected program design and will be an expected part of the first phase of program implementation in Q3 FY25.</p>
		<p><b>A.1.d. Sustainability, Transfer and Exit Strategy</b></p> <p>Transition /exit plan</p> <p>.....</p> <p><b>Timeframe:</b></p> <p><i>Midterm review - FY26/27</i></p>	

Area of Improvement	Action / Activity & Responsibility	Deliverable/Expected Outcome & Timeframe	Summary of Implementation & Status
<p><b>B.</b> Strengthening community response to child sexual abuse and GBV against children within project communities.</p>	<p><b>Action B.1.</b> 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><b>Responsibility:</b> IFC/ Implementation partner</p>	<p><b>B.1.a. Plan of Action:</b> Outline of prevention interventions using participatory methods ..... <b>Timeframe:</b> FY25</p>	<p>Program design will be based on the outcome of the consultations and is planned to be finalized by end CY2024.</p>
		<p><b>B.1.b. Training of community facilitators/mentors</b> ..... <b>Timeframe:</b> FY25</p>	
		<p><b>B.1.c. Implementation</b> (as outlined in Action A.1) ..... <b>Timeframe:</b> Over program lifecycle <i>Timelines as per Action A.1. (indicative dates to be adjusted based on the final design of the program)</i> <b>Implementation Plan - FY25</b> <b>Mid-term review - FY26</b> <b>Final evaluation - FY27</b> <b>Transition /exit plan:</b> Subject to review in FY26/27</p>	

Area of Improvement	Action / Activity & Responsibility	Deliverable/Expected Outcome & Timeframe	Summary of Implementation & Status
<b>INSTITUTIONAL STRENGTHENING</b>			
<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><b>Action C.1.</b> Undertake a review of its portfolio to identify child sexual abuse and GBV risks in investments and determine appropriate risk management measures when needed.  <b>Responsibility:</b> IFC</p>	<p><b>C.1.a. Summary Report</b>  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.  <b>Timeframe:</b> Q2 FY25</p>	<p><b>Status:</b> In progress / December 2024  The portfolio review has been conducted in four phases. The team is moving into the final Phase 4 of the review – developing corrective action plans with clients where necessary and analyzing the overall results. IFC will draft a brief confidential Summary Report by the end of 2024.</p>
	<p><b>Action C.2.</b> Review the E&amp;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.  <b>Responsibility:</b> IFC</p>	<p><b>C.2.a. Updated investment agreement templates.</b>  <b>Timeframe:</b> FY25</p>	<p><b>Status:</b> In progress  IFC updated legal covenants in investment agreement templates with SEAH, child protection incident reporting, and sexual harassment policy obligations for new investments. Next step is to train staff and roll out implementation of these provisions to new investment agreements.</p>
	<p><b>Action C.3.</b> Update existing gender and GBV project risk screening methodology and relevant guidance to E&amp;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&amp;S due diligence and portfolio monitoring throughout the project cycle.</p>	<p><b>C.3.a. Updated gender and GBV project risk methodology</b> to include child protection. Actions on GBV and child sexual abuse methodology, digitalization, and guidance.  <b>Timeframe:</b> Q1 FY25</p>	<p><b>Status:</b> In Progress/April 2025  GBV project risk screening methodology and accompanying guidance for E&amp;S specialists have been updated to include child protection risk screening. In August 2024, the GBV Risk Screening tool and GBV supervision questionnaire were integrated into the new comprehensive ESG platform – ESG360 – a one-stop shop for all ESG solutions. This integration will enable improved systematic and mandatory identification and management of GBV/child safeguarding risks throughout the project cycle.</p>

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	<p><b>Responsibility:</b> IFC</p>		<p>A new GBV dashboard to enable systemic monitoring and follow-up with the GBV team is under development and will be operational in Q3 FY25 as a complementary activity, once sufficient data becomes available from the ESG360 platform to feed into the dashboard.</p>
	<p><b>Action C.4.</b> Review and update E&amp;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><b>Responsibility:</b> IFC</p>	<p><b>C.4.a. Updated questionnaires and annual monitoring templates</b> to include child safeguarding.</p> <p><b>Timeframe:</b> Q1 FY25</p>	<p><b>Status:</b> Completed - Q1 FY25</p> <p>GBV questionnaires and annual monitoring templates have been updated to include child safeguarding. These have been integrated into the ESG360 due diligence and monitoring platform. In addition, GBV and child safeguarding questionnaires remain available for E&amp;S specialists to contextualize for a specific project and remain a useful tool. Additional guidance and training is accompanying the rollout for E&amp;S specialists. In addition, staff resources are available on strengthening GBV and child safeguarding in Environmental and Social Action Plans following risk assessment.</p>
	<p><b>Action C.5.</b> 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><b>Responsibility:</b> IFC</p>	<p><b>C.5.a. Statement</b></p> <p><b>Timeframe:</b> FY24</p>	<p><b>Status:</b> Completed/ Operationalization in progress</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>Changes to operational procedures to reflect “see something, say something” policy; in progress, to be completed by Q3 FY25.</p>

Area of Improvement	Action / Activity & Responsibility	Deliverable/Expected Outcome & Timeframe	Summary of Implementation & Status
<p><b>D.</b> Undertake institution-wide capacity building efforts to prevent child sexual abuse and overlapping forms of GBV from occurring in its investment projects.</p>	<p><b>Action D.1.</b> 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>.....</p> <p><b>Responsibility:</b> IFC</p>	<p><b>D.1.a. Increase GBV specialist staffing</b></p> <p>.....</p> <p><b>Timeframe:</b> Q4 FY24</p>	<p><b>Status:</b> Completed - August 2024</p> <p>.....</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 has been hired.</p>
	<p><b>Action D.2.</b> IFC will deliver the following capacity building actions:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul> <p>.....</p> <p><b>Responsibility:</b> IFC</p>	<p><b>D.2.a. Annual training plan</b></p> <p>.....</p> <p><b>Timeframe:</b> Q1 FY25</p> <p><b>D.2.b. Regional external GBV consultants' workshops</b></p> <p>.....</p> <p><b>Timeframe:</b> FY25</p>	<p><b>Status:</b> In Progress / FY25</p> <p>.....</p> <p><b>D.2a.</b> - IFC drafted an annual training plan which includes mandatory training for IFC staff. Several training sessions have already taken place:</p> <p><b>Staff:</b> The first E&amp;S staff training on child safeguarding took place on April 2, 2024. This complements annual E&amp;S training on gender and GBV. The next 2 mandatory internal training sessions on child safeguarding are scheduled in October.</p> <p><b>FI Clients:</b> Two GBV awareness raising webinars for FI clients took place in March. In addition, since February, FI clients can access new GBV guidance on IFC's FIRST website.</p> <p><b>D.2.b.</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 deliverable during their onboarding team retreat at the</p>

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	<p><b>Action D.3.</b> IFC will develop the following tools and guidance:</p> <ul style="list-style-type: none"> <li>• 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).</li> <li>• 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.</li> <li>• Provide guidance to IFC Nominee Directors, using the Tip Sheet: Guidance for Boards of Directors on Overseeing Gender-Based Violence and Harassment Risk.</li> </ul> <p>.....  <b>Responsibility:</b> IFC</p>	<p><b>D.3.a. Good Practice Note on Child Safeguarding in Business</b>  .....  <b>Timeframe:</b> FY25</p> <p><b>D.3.b. GBV Company Diagnostic Tool</b>  .....  <b>Timeframe:</b> FY25</p> <p><b>D.3.c. Guidance to IFC Nominee Directors</b>  .....  <b>Timeframe:</b> FY24 and ongoing for new Nominee Directors as they join</p>	<p>beginning of September and will receive a train-the-trainer course to equip them to roll out the training across regions in FY25.</p> <p><b>Status:</b> In Progress / Q3 FY25  .....  <b>D.3.a.</b> - A specialized consultancy firm was contracted to develop a new Good Practice Note on Child Safeguarding in Business. The note has been drafted and is under final review. Expected publication in Q2 FY25.</p> <p><b>D.3.b.</b> - The technical content and piloting of the GBV Company Diagnostic Tool has been finalized. It will be digitalized before publication. Expected launch in Q1 FY26. In the interim, the non-digital version is still being used with clients as part of ESG advisory solutions.</p> <p><b>D.3.c.</b> - Since October 2023 new IFC Nominee Directors receive guidance on E&amp;S risk review. The first two targeted training sessions on GBV Risk Governance for Nominee Directors took place in January and June 2024. They will be followed by an annual refresher. The IFC Guidance for Boards of Directors on Overseeing GBVH was distributed.</p>

Area of Improvement	Action / Activity & Responsibility	Deliverable/Expected Outcome & Timeframe	Summary of Implementation & Status
<p><b>E.</b> 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><b>Action E.1.</b> 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><b>Responsibility:</b> IFC</p>	<p><b>E.1.a. Advisory Committee in place and functioning.</b></p> <p>.....</p> <p><b>Timeframe:</b> Q4 FY24</p>	<p><b>Status:</b> Completed - August 2024</p> <p>.....</p> <p>Advisory Committee was launched on August 1, 2024. The co-chairs were appointed, and upcoming work planned, supported by an Advisory Committee Secretariat.</p>



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