

PROTECTION FROM SEXUAL EXPLOITATION, ABUSE AND HARASSMENT POLICY

May 2021

NOTE

Protection from Sexual Exploitation, Abuse and Harassment Policy

Approval Date: 21 May 2021

Policy Owner: GPE Board of Directors

Cross Reference/Related policies:

- [Charter of the Global Partnership for Education](#)
- [GPE Code of Ethical Conduct for Governance Officials](#)
- [GPE Grant Agents Minimum Standards](#)
- [World Bank Group Code of Ethics](#)
- [World Bank Group Staff Manual¹](#)

If you have a concern about inappropriate behavior perpetrated by a Global Partnership for Education Secretariat staff or governance official, please contact: ethics@globalpartnership.org

If you have a concern about inappropriate behavior on a GPE funded program, please report to the relevant Grant Agent using their report mechanisms available on the [GPE website](#).

This Policy becomes effective from the date of Board of Directors approval and shall be implemented from the effectiveness date. This Policy shall be reviewed and updated, as necessary, to ensure alignment with international best practices.

The Secretariat shall disseminate this Policy to all GPE Partners. The Policy will be posted on the Global Partnership for Education website and will be included in Grant Guidelines and Policies. In addition, a copy of this Policy shall be sent to all Local Education Groups upon notification of an allocation from the GPE Trust Funds.

¹ Accessible only to World Bank staff

DEFINITIONS

Alleged subject of concern: an individual or group of individuals who is alleged to have acted in breach of the Protection from Sexual Exploitation, Abuse and Harassment Policy (PSEAH) policy – but the claim has not yet been substantiated.

Beneficiary: an individual who receives direct ‘benefit’ through the GPE’s programming – this may be resources, services, training, education or any other benefit.

Child: refers to any person under the age of 18, in accordance with the Convention on the Rights of the Child (CRC).²

Complainant: the person(s) who file(s) a complaint regarding breach of PSEAH policy. This can be the alleged survivor or may be a witness or another person who becomes aware of the breach.

Discrimination: refers to “any unfair treatment or arbitrary distinction based on a person’s race, sex, gender, sexual orientation, gender identity, gender expression, religion, nationality, ethnic origin, disability, age, language, social origin or other similar shared characteristic or trait”, according to the UN.³

Do no harm: in GPE to ‘do no harm’ means to avoid causing damage or suffering, through action or inaction, as a result of GPE activities.

Governance officials: in the GPE context, this refers to members of the Board of Directors and its Committees (standing and ad hoc).

Informed consent: permission granted in full knowledge of the possible consequences. This includes understanding the principle of confidentiality, the intended use of the information and how the information will be protected. Informed consent is voluntarily and freely given.⁴

PSEAH: within this document, the acronym PSEAH means “Protection from Sexual Exploitation, Abuse and Harassment”. It covers prevention, mitigation and response.

Sexual abuse: refers to “the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions”.⁵ All sexual activity with a child is sexual abuse.⁶

² [Convention on the Rights of the Child \(1989\)](#)

³ [UN Secretary-General’s bulletin \(2019\), Addressing discrimination, harassment, including sexual harassment, and abuse of authority, ST/SGB/2019/8](#)

⁴ [OHCHR, Basic Principles of Human Rights Monitoring](#)

⁵ [UN Secretary-General’s Bulletin \(2003\), Special measures for protection from sexual exploitation and sexual abuse, ST/SGB/2003/13](#)

⁶ [UN Glossary on Sexual Exploitation and Abuse, Thematic Glossary of current terminology related to Sexual Exploitation and Abuse \(SEA\) in the context of the United Nations, second edition](#)

Sexual exploitation: refers to “any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including but not limited to profiting monetarily, socially, or politically from the sexual abuse of another.”⁷

Sexual harassment: means any unwelcome conduct of a sexual nature that may reasonably be expected or be perceived to cause offense or humiliation, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. Sexual Harassment may occur in the workplace or in connection with work. While typically involving a pattern of conduct, Sexual Harassment may take the form of a single incident. In assessing the reasonableness of expectations or perceptions, the perspective of the person who is the target of the conduct is considered.⁸

SEAH: within this document, the acronym SEAH shall be interpreted to mean sexual abuse, sexual exploitation or sexual harassment.

Survivor: we use the term survivor to describe the person who has experienced SEAH violence. Sometimes people use the word ‘victim’.

Whistleblowing: when a person passes on information concerning potential or actual breach of PSEAH policy which they feel is in the public interest.⁹

⁷ UN Secretary-General’s Bulletin (2003), Special measures for protection from sexual exploitation and sexual abuse, [ST/SGB/2003/13](#)

⁸ World Bank Staff Rule 3.00 – Office of Ethics and Business Conduct (EBC)

⁹ World Bank Staff Rule 8.02 – Protections and Procedures for Reporting Misconduct (Whistleblowing) clause 4.02 on External Reporting of Suspected Misconduct, which specifies conditions under which Staff are extended protection against retaliation when reporting suspected misconduct to an entity or individual outside of the established internal mechanisms, applies to all GPE Staff.

1. INTRODUCTION

The Global Partnership for Education (hereinafter “GPE”) is the largest global fund solely dedicated to transforming education in lower-income countries, and a unique, multi-stakeholder partnership. It works to deliver quality education so that every girl and boy can have hope, opportunity, and agency.

GPE brings together developing and donor countries, multilateral agencies and nongovernmental organizations (including international and local civil society organizations [CSOs]), representatives of the teaching profession, the private sector and foundations supporting the education sector in developing countries. The GPE Secretariat provides administrative and operational support to the partnership and facilitates collaboration with all partners.

In order to operationalize and realize its aims and objectives, GPE requires a transparent, accountable and effective governance structure. The [Charter of the Global Partnership for Education](#) outlines this structure in detail.

2. PURPOSE AND SCOPE

2.1 Purpose

This policy outlines both expectations and requirements for GPE Governance Officials, GPE Secretariat staff and all GPE partners involved in the implementation of GPE grants to prevent, manage the risk of and address sexual exploitation, abuse and harassment (SEAH) incidents, should they occur in the delivery of GPE program of work. Preventing SEAH is a shared responsibility. All partners must play an active role in reporting and addressing SEAH incidents as they occur.

GPE will give practical effect to the Policy through agreements, reporting requirements and regular communication to GPE Secretariat staff, partners and the GPE Board of Directors (hereinafter “the Board”).

The principal aim of this policy is to protect all partners, staff and beneficiaries from wrongdoing in the form of Sexual Exploitation, Abuse and Harassment.

This policy outlines:

- PSEAH principles that all GPE partners must follow
- Roles and responsibilities of GPE partners
- Reporting mechanisms and case handling
- PSEAH communications protocol

2.2 Scope

This Policy applies to GPE Secretariat Staff, GPE Governance Officials, and all GPE Programs.

a. **GPE Secretariat Staff**

In accordance with the World Bank Group Staff Manual, the following are included:

- GPE Secretariat staff;
- Consultants working in the GPE Secretariat;
- Seconded staff.

For GPE Secretariat staff, this policy constitutes a guidance, which in the Policies and Procedures Framework, is a set of principles and rules that staff are expected to apply unless they can provide a rationale for not doing so. Furthermore, GPE Secretariat staff, being World Bank staff, are expected to abide by the following policies and procedures:

- [GPE Code of Ethical Conduct for Governance Officials](#)
- [World Bank Group Code of Ethics](#)
- [World Bank Group Staff Manual](#)¹⁰

b. **Governance Officials**

In addition to this Policy, all Governance Officials are also expected to abide by the [GPE Code of Conduct for Governance Officials](#).

c. **GPE partners involved in the implementation of GPE grants**

These parties are expected to act in accordance with the principles and reporting requirements outlined within this Policy. They must also abide by their own relevant policies, as well as international declarations, conventions, agreements and standards that relate to protection from sexual exploitation, abuse and harassment (PSEAH), including for example the Inter-Agency Standing Committee (IASC) Minimum Operating Standards for protection from sexual exploitation and abuse.

¹⁰ Accessible only to World Bank staff.

3. PSEAH PRINCIPLES

GPE has zero tolerance for sexual exploitation, abuse and harassment of any kind. GPE is committed to addressing all forms of sexual exploitation, abuse and harassment through prevention, mitigation¹¹ and response. This means that GPE takes all concerns reported seriously. Survivors will be at the center of any response and not further harmed or disempowered by any processes.

GPE further recognizes that as an education actor, it has a particular responsibility to protect children from sexual exploitation, abuse and harassment as these acts have the potential to limit children's access to education and quality of learning.

This Policy's key policy positions and commitments are underpinned by the principles outlined below. These principles reflect GPE's international commitments to address SEAH.¹²

GPE's prevention, mitigation and response to SEAH is guided by the following overarching principles:

Principle 1: Zero-tolerance approach to SEAH.

- Sexual exploitation, abuse and harassment are never acceptable. GPE defines zero-tolerance as acting on every allegation in a fair, timely and reasonable manner with due regard for procedural fairness.
- GPE recognizes that achieving a significant reduction of SEAH in the aid sector is a long-term endeavor to which all organizations must firmly commit to and contribute. GPE does not partner with entities that fail to address sexual exploitation and abuse.
- GPE commits to taking action on all credible reports of SEAH.

Principle 2: Ensure PSEAH is understood as a shared responsibility.

- Protection from SEAH is a shared responsibility, requiring collaboration among all GPE Partners and stakeholders in GPE funded programs.

¹¹ We recognize that for some organizations, mitigation is a legal requirement whereas for others it is part of a principled approach to their operations, including "do no harm".

¹² Chiefly, the Whistler Declaration on Protection from Sexual Exploitation and Abuse in International Assistance; the commitments made by donors in at the 2018 United Kingdom Safeguarding Summit and the [DAC Recommendation on Ending Sexual Exploitation, Abuse, and Harassment in Development Co-operation and Humanitarian Assistance](#)

- GPE commits to reviewing and where necessary renewing efforts with the wider international system to ensure that this Policy is fit for purpose, in line with similar efforts in the aid sector and benchmarked against best practices.

Principle 3: Support survivors.

- Prioritize the needs and rights of those who have experienced SEAH.
- Apply a survivor-centered approach throughout all PSEAH work (prevention, mitigation and response).
- When responding to allegations of SEAH, GPE is committed to ensuring confidentiality, safety, non-discrimination, respect, informed consent and to the principle of 'do no harm'.

Principle 4: Intervene as early as possible.

- Identify SEAH risks as early as possible in the project cycle while taking a risk-based approach across GPE's work. This will help to identify projects in which SEAH incidents are more likely to take place and ensure that SEAH prevention, mitigation and response measures are sufficiently integrated into project design and implementation. This will contribute to improved protection for SEAH survivors.

Principle 5: Contextualize.

- SEAH manifests differently across countries, sectors, and projects and therefore prevention, mitigation, and response of SEAH will be specific to the particular context. GPE will therefore ensure that risks are assessed contextually, and that policies, practices and procedures of Grant Agents are responsive to different country and project contexts.

Principle 6: Be gender equal and socially inclusive.

- Recognizing that the most marginalized people are at increased risk of experiencing SEAH. This includes groups at risk such as women, girls and boys, as well as persons most at risk of discrimination on the basis of, for example, sex, transgender identity or expression, sexual orientation, ethnicity, religion or other belief, disability or age. As SEAH is about perpetrators asserting power, any approach to prevent, mitigate and respond to SEAH must be based on a thorough understanding of power and how it plays out.

Principle 7: Accelerate change through strong leadership.

- The GPE Secretariat will incentivize cultural change through strong leadership, organizational accountability and stronger human resource processes.
- The Board will hold all partners to account.

Principle 8: Be proportionate.

- Recognizing that our policy may go beyond the policies and processes in place for our partners. In these instances, GPE will take a proportionate approach which is in accordance with the level of risk associated with the program, activity and interaction with children (in particular), in order to gain a level of assurance commensurate with those risks.
- All GPE Grant Agents are assessed against [Grant Agent Minimum Standards](#) on SEAH prior to accreditation. Additionally, all existing and new Grant Agents will be encouraged to self-assess against GPE’s SEAH Good Practice Guidelines to determine improvements that may need to be made.
- Whereas organizations not meeting GPE’s Grant Agent Minimum Standards cannot be accredited as GPE Grant Agents, gaps based on assessment against the SEAH Good Practice Guidelines will not prevent organizations from continuing as or becoming GPE Grant Agents. Rather, Grant Agents will be expected to remedy identified gaps within agreed timeframe and provide updates to the GPE Board of Directors as required.

4. ROLES AND RESPONSIBILITIES OF GPE PARTNERS

4.1 The Board

The Board, as the policy owner, is responsible for ensuring that PSEAH policy is, and continues to be, fit for purpose by approving the PSEAH policy and subsequent revisions. The Board is also responsible for ensuring effective implementation of this policy and holding GPE partners accountable.

Board Members shall demonstrate their commitment to the creation of a safe work environment and the prevention of SEAH, educate themselves on the issue, act as role models by maintaining a high standard of personal conduct with consciousness of the power their position holds and treat all colleagues with dignity and respect.

4.2. The Secretariat

- i. The Secretariat will be responsible for coordinating communication to the Board on credible SEAH incidents and shall communicate information to the Board in accordance with the Communications Protocol in section 6 of this policy.
- ii. The Secretariat shall develop and share guidance and approaches to assist in selection, design and implementation of good practice for the education sector as a means to contribute to risk mitigation.

- iii. As part of the Quality Assurance Review (QAR) process for System Transformation Grants, the Secretariat will verify that Grant Agents have followed their own policies and procedures to consider SEAH risk that is either induced or exacerbated by the GPE grant
- iv. The Secretariat Chief Executive Officer (CEO) shall ensure that appropriate SEAH considerations are embedded in the recruitment process and that staff receive relevant training on an ongoing basis. Guidelines are provided in Annex 2.
- v. The Secretariat CEO will ensure that PSEAH is discussed regularly by the Management Team.
- vi. The Secretariat is expected to provide any support necessary to facilitate timely and satisfactory management of SEAH incidents. The Secretariat does not have investigative capacity or authority and shall not conduct investigations.

4.3. Local Education Group

Members of the Local Education Group (LEG) comprising of developing country partner governments, local donors, civil society organizations, multilateral agencies, and the private sector and private foundations have a role to play in monitoring the implementation of the endorsed education plan of developing country partners. LEG members are encouraged to communicate with each other regarding any information they may have on possible or suspected SEAH incidents in the education sector. The LEG is expected to be in regular and open communication with the Secretariat and other stakeholders regarding credible allegations and/or evidence of any SEAH incidents in the education sector, and with regard to GPE Trust Funds in particular, including steps taken to address the issue. In dealings with the Secretariat, the LEG acts through the Coordinating Agency.

4.4. Governments of Developing Country Partners

Developing Country Partner (DCP) governments implementing programs supported by GPE Trust Funds shall have a strong system of internal controls that seek to prevent, mitigate, and respond to SEAH, including procedures to support survivors. They also communicate any SEAH incidents to the Secretariat and report, through the Grant Agent on measures taken or planned to protect survivors and prevent recurrence of SEAH.

4.5. Grant Agents

GPE Grant Agents will use their own policies and procedures to address SEAH incidents on GPE funded programs. Prior to their accreditation, all GPE Grant Agents must meet the minimum standards on **prevention of sexual exploitation, abuse and harassment** as per the [Grant Agents minimum standards](#) approved by the GPE Board in 2018.

They are subsequently expected to maintain compliance with these minimum standards. In addition, recognizing the importance of having a more robust mechanism for addressing SEAH, all Grant Agents are encouraged to self-assess¹³ against the GPE PSEAH Good Practice Guidelines (see Annex 1) and where gaps are identified, take steps to progressively strengthen their policies and procedures. Acknowledging current policies and procedures, Grant Agents would be expected to confirm their consideration of SEAH risk in project development and delivery. To facilitate reporting to the GPE Board, all GPE Grant Agents must report, in a timely manner, all credible SEAH allegations to the GPE Secretariat in accordance with the Grant Agent's policies and procedures, along with the outcome of investigations and corrective or remedial measures taken.

5. REPORTING AND CASE HANDLING

5.1 Guiding principles for handling complaints

The following principles will underpin reporting and case handling:

Confidentiality

GPE understands the importance of maintaining confidentiality at all stages of the process when dealing with safeguarding concerns. Confidentiality is critical to a satisfactory outcome to protect the privacy and safety of all concerned. Information relating to the concern and subsequent case handling of that concern should be shared on a need-to-know basis only and should always be kept secure. Breach of confidentiality, for anything other than appropriate case management, handling or legal obligation or for whistleblowing purposes where an individual feels that the case has not been handled adequately through internal mechanisms and where whistleblowing is necessary to avoid:

¹³ The process for assessment against the GPE PSEAH Good Practice Guidelines will be integrated into and aligned with the current accreditation process. For existing Grant Agents, this self-assessment is expected to be completed within 6 months of the policy approval date, or as agreed with GPE Secretariat, based on a separate self-assessment tool provided by the GPE Secretariat

- i. a significant threat to public health or safety, or
- ii. substantive damage to GPE operations, or
- iii. a violation of national or international law, is a breach of this policy. GPE Secretariat is subject to the [World Bank Access to Information Policy](#).

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

Responsiveness

Each complaint which falls within the scope of this policy is acknowledged in alignment with the agreed GPE response timeframe as outlined in this policy.

Non-retaliation

Retaliation refers to any direct or indirect detrimental action that adversely affects the employment or working conditions of an individual, where such action has been recommended, threatened or taken for the purpose of punishing, intimidating or injuring an individual because of a complaint submitted in good faith. It is the right of all stakeholders to complain. Any attempt of retaliation against a complainant is considered misconduct and a breach of this policy.

Objectivity

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

Safety and Welfare

The safety of the complainant, alleged victim or survivor, witnesses, alleged subject of concern and staff is paramount.

5.2 Reporting requirements

GPE is committed to responding effectively, sensitively, and swiftly to all allegations of breach to this PSEAH policy. Reports of SEAH incidents can be submitted by any person and against any person, irrespective of whether such persons have any contractual status with GPE. All GPE partners have an obligation to report incidents of SEAH.

In line with World Bank Group policies, GPE Secretariat staff with managerial responsibilities are mandated to report incidents of SEAH or allegations that are brought to their attention. GPE Secretariat staff are encouraged to do so. However, given the nature of GPE's work, failure on the part of GPE Secretariat staff to report SEAH will constitute a failure of the staff to perform duties satisfactorily.

5.3 Reporting mechanism and investigations

The responsible party for receiving reports and conducting investigation of SEAH incidents will vary in the manner described below:

- a) The World Bank, as host of the Secretariat, is responsible for addressing all SEAH incidents involving GPE Secretariat staff. The World Bank shall apply its own policies and procedures to address all SEAH incidents. The Office of Ethics and Business Conduct (EBC) of the World Bank is responsible for handling SEAH incidents involving World Bank staff. Please contact ethics@globalpartnership.org to report incidents involving GPE Secretariat staff.
- b) All allegations pertaining to non-GPE Secretariat staff Governance Officials will be handled in accordance with the [GPE Code of Ethical Conduct for Governance Officials](#). Please contact ethics@globalpartnership.org to report incidents involving Governance Officials.
- c) Grant Agents have primary responsibility for investigating SEAH incidents within GPE funded programs, in accordance with their own internal policies and procedures to investigate and manage all SEAH incidents. Accordingly, Grant Agents are required to meet and maintain GPE's minimum standards on PSEAH. Please report SEAH incidents on GPE funded programs to the relevant Grant Agent using their report mechanisms available on the [GPE website](#).

6. PSEAH COMMUNICATIONS PROTOCOL

Principle of Transparency. The Global Partnership for Education, a partnership of developing countries, donors, civil society organizations, the private sector and private foundations and multilateral agencies, operates in an open and transparent manner. As set out in the Charter, "Relationships and communications among developing country partners, donors, multilateral agencies, civil society organizations and the private sector and private foundations are built on clarity and transparency."

Communication to Secretariat. As set out in the Policy in Section 3 above, GPE Partners have zero tolerance for SEAH once it has occurred and take action, according to their own regulations, rules, policies and procedures, to address the SEAH incident, including taking steps to protect survivors. All GPE Partners are expected to communicate promptly information regarding credible allegations of SEAH on GPE programs to the relevant Grant Agent and to the Secretariat.

Communication to the Board. It is essential that information be shared with the Board and relevant committee(s) as soon as possible regarding credible SEAH incident. Early disclosure enables the Board to act swiftly in response to information on SEAH and be prepared for further enquiries from stakeholders. Information shared with the Board will not include any identifying details which may reveal the identity of individual parties involved.

Communication to the Board – Confidentiality Requirements

Board Members and Alternate Board Members and members of relevant committee(s) are eligible to receive official communications from the Secretariat regarding SEAH incidents. All eligible persons are required to provide written confirmation that they will respect the confidentiality of the information provided in this way. Persons having provided this written confirmation shall be placed on a restricted email list for the purpose of communicating on credible SEAH incidents. Further sharing of this information shall be limited to that which is required by the policies of the respective organizations.

All persons eligible to receive such information shall make efforts to ensure that anyone with whom the information is shared is aware of the need to maintain the confidentiality of the information.

Upon receipt of information relating to credible allegations or evidence of SEAH incidents, the Chief Executive Officer of the Secretariat shall advise the Chair of the Board of the content of the information. The Chair of the Board and Chief Executive Officer shall immediately send a joint communication to the Board restricted email list, disclosing the information unless, under exceptional circumstances, they decide it is necessary to maintain the confidentiality of such information in order to:

- protect an ongoing investigation of those involved in the SEAH incident;
- avoid compromising any legal or other action taken by the national authorities of the country involved;
- protect the personal safety of those undertaking the investigation;
- protect survivors and persons making reports of SEAH incidents (whistleblowers); and/or
- avoid legal and other action (defamation, etc.) due to the release of detailed and possibly unsubstantiated allegations against those potentially involved in the SEAH incidents.

Report at Board Meetings. The Chief Executive Officer shall provide a report at Board meetings as required, in executive session if necessary, regarding information known at the time regarding SEAH incidents, subject to relevant confidentiality requirements.

Public Disclosure. The GPE website shall include a dedicated page with information on SEAH including, but not limited to, GPE policies and procedures, and Grant Agent report channels. These disclosures shall be in line with the policies and procedures of the organization responsible for investigating the allegation.

Lessons Learned. On an annual basis the Secretariat shall prepare a paper for consideration by the Board or relevant committee of the lessons learned from the findings of SEAH, if any, over the previous year. Such reports shall include recommendations based on the lessons learned.

7. EFFECTIVENESS DATE AND POLICY REVISION

Policy Review Controls at the GPE This policy should be reviewed every two years. The policy should be updated by the Policy Owner for the following reasons:

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

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

ANNEX 1: GPE PSEAH GOOD PRACTICE GUIDELINES FOR GPE GRANT AGENTS

<p>Safeguarding Policies</p>	<ol style="list-style-type: none"> 1. Organizations should have an overarching/combined safeguarding policy or a combination of relevant policies which address sexual harassment and abuse targeted at both beneficiaries, including adults at risk and staff. 2. Organizations should have a child safeguarding policy which address all forms of sexual, physical and emotional violence towards children. 3. All organizations should have a PSEAH policy.
<p>Whistleblowing and complaints</p>	<ol style="list-style-type: none"> 4. All organizations should have comprehensive systems for reporting and addressing concerns and complaints. These should include the option of whistleblowing and for this to be available to both beneficiaries, including children and their caregivers, and staff without reprisal. 5. All organizations should work with communities and constituencies to analyze the more appropriate and accessible means to report concerns and complaints and multiple methods to do so must be put in place. 6. A clear handling framework, to respond appropriately to all concerns and support the survivor of violence should also be in place.
<p>Human resources</p>	<ol style="list-style-type: none"> 7. All organizations should have a human resources system which includes effective management of recruitment, vetting, performance management and disciplining staff who engage in misconduct. Vetting must include adequate screening and assessment of individuals that will have direct contact with children and vulnerable people. 8. All staff, contractors, volunteers and other representatives of the organization should have at least a mandatory induction when they start and annual refresher training on the organization's safeguarding policy (or bundle of policies) and whistleblowing.

<p>Risk management</p>	<ol style="list-style-type: none"> 9. Each organization should have a comprehensive and effective risk management framework in place which includes reference to both safeguarding and a detailed risk registers for the project. The risk register should include reference to safeguarding risks, including those for children and for staff. 10. The organization should conduct appropriate due diligence of PSEAH policies and procedures of a developing country partner government or other entity receiving funds under a Grant Agreement as per the Proposal approved by the Board and advise the Board of their assessment of those systems. 11. Each organization should have procedures in place to make sure that safeguarding processes and standards are also upheld for any partner, contractor or supplier they work with.
<p>Governance and accountability</p>	<ol style="list-style-type: none"> 12. Effective governance and accountability standards should be in place within all organizations with their Board holding ultimate responsibility for safeguarding. 13. There is adequate focus on PSEAH by their governance bodies and senior management for activities funded through GPE Trust fund resources. 14. There are clear guidelines for monitoring and overseeing implementation of the policy (policies). 15. Subject to confidentiality requirements, information on SEAH cases on GPE funded programs, along with lessons learnt, should be shared with relevant country level partners through the Local Education Group (LEG).

ANNEX 2: PSEAH SUGGESTED GUIDELINES FOR RECRUITMENT AND TRAINING OF GPE SECRETARIAT STAFF

Building safe environments within organizations relies on the appointment of suitably qualified and skilled staff that have the appropriate values, attitudes, and approach to protection from sexual exploitation, abuse, and harassment.

In addition to World Bank recruitment background checks, GPE Secretariat-specific measures will include at least the following safe recruitment measures:

- Assessment of the role for the type and frequency of potential contact with program beneficiaries or access to sensitive data.
- Applicants to be advised of their responsibilities towards protection from sexual exploitation, abuse, and harassment.
- GPE's commitment to PSEAH shall be included in advertisements for staff (this includes consultants).
- Where a criminal record check indicates that a successful applicant is unsuitable for that role, no job offer will be made, or any existing job offer withdrawn.
- Where possible, all references are to be checked by contacting the Human Resources of the organization/company listed (where the referee is not a member of the Human Resources team) to confirm employment.

The GPE Secretariat will continue to provide mandatory training to all staff, in collaboration with the Office of Ethics and Business Conduct of the World Bank.

a. New hires (including consultants/contractors working on discreet pieces of work)

- Inductions for all new hires will incorporate the PSEAH policy and procedures.
- It is the responsibility of an individual's line manager to make sure that they have received an appropriate induction and this information is recorded on a tracker within the GPE.
- All Staff should receive a PSEAH induction within the first week of starting their role with the GPE.

b. Existing staff (part-time, full-time, and regular contractors)

- Annual 1-day PSEAH training covering this policy, reporting, feedback on the usefulness and relevance of the policy, accessibility and trust in the reporting mechanisms and handling procedure, and PSEAH basics (including power and ethics)
- Inclusion of key information from this policy (including reporting lines) in team news/bulletins on a bi-annual basis
- Other ad-hoc training to be scheduled in response to identified needs as required, for example in response to updates to this policy
- A one-page summary of this policy to be circulated periodically and particularly during periods of high travel volume to remind staff and contractors of the policy bulletin.
- All GPE Secretariat staff are to promote reporting mechanisms via a stock email signature

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