
First Compliance Monitoring Report:
**IFC's Implementation of the Management Action Plan
for Bridge International Academies-04 / Learn Capital
01-04, Kenya**

June 18, 2025

IFC Projects: #32171, #38733, #39170, and #39224

About CAO

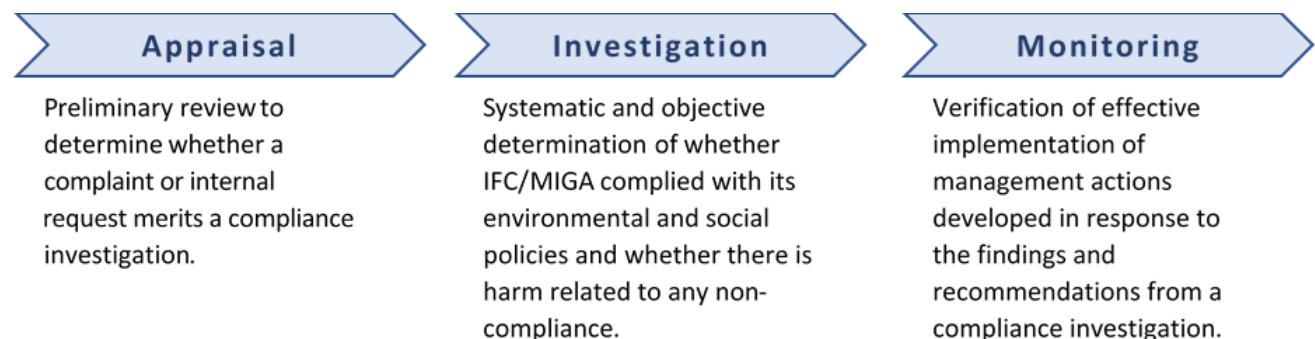
The Office of the Compliance Advisor Ombudsman (CAO) is the independent accountability mechanism of the International Finance Corporation (IFC) and Multilateral Investment Guarantee Agency (MIGA), members of the World Bank Group. We work to facilitate the resolution of complaints from people affected by IFC and MIGA projects in a fair, objective, and constructive manner, enhance environmental and social project outcomes, and foster public accountability and learning at IFC and MIGA.

CAO is an independent office that reports directly to the IFC and MIGA Boards of Executive Directors. For more information, see www.cao-ombudsman.org.

About the Compliance Function

CAO's compliance function reviews IFC and MIGA compliance with environmental and social policies, assesses related harm, and recommends remedial actions where appropriate.

CAO's compliance function follows a three-step approach:



Acronyms

AC	Advisory Committee
CAO	Office of the Compliance Advisor Ombudsman (IFC and MIGA)
CSA	Child Sexual Abuse
DG	Director General
E&S	Environmental and Social
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESDD	Environmental and Social Due Diligence
ESMS	Environmental and Social Management System
ESRP	Environmental and Social Review Procedures
ESRS	Environmental and Social Review Summary
FY	Fiscal Year
GBV	Gender-Based Violence
GIIP	Good International Industry Practice
IFC	International Finance Corporation
MAP	Management Action Plan
MIGA	Multilateral Investment Guarantee Agency
MPR	Management Progress Report
PS	IFC Performance Standards
SEP	Stakeholder Engagement Plan

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1. Overview

This report presents the results of CAO monitoring of IFC's implementation of remedial actions to address the findings of the Bridge-04 case in Kenya (the case is officially archived as Bridge International Academies-04 / Learn Capital 01-04, Kenya). IFC leadership has acknowledged that this case underscored the importance of safeguarding vulnerable populations, particularly children, when supervising investments, and working with clients to address occurrences of child sexual abuse and gender-based violence in projects.¹ IFC's ongoing responses include both project-level and institutional actions.

This report assesses the first year of IFC efforts to implement the [Management Action Plan \(MAP\) for Bridge International Academies-04 / Learn Capital 01-04](#), which was approved by the IFC Board of Directors on March 13, 2024. IFC developed the MAP in response to the findings of a CAO [compliance investigation](#) into allegations of child sexual abuse at Kenyan schools run by IFC client Bridge International Academies.

CAO's Director General initiated the Bridge-04 compliance process in September 2020, and the case therefore did not involve complainants. Subsequently, CAO received four complaints by former students at a Bridge school in Kenya who stated they were sexually abused and harassed by a teacher. In August 2024, CAO merged their complaints (Learn Capital complaints 01-04, described further below) with the Bridge-04 compliance monitoring process, due to the similarity of the issues addressed.

This monitoring report outlines CAO's observations on the effective implementation of the actions set out in IFC's Bridge-04 MAP, as stipulated in paragraphs 139-146 of the [CAO Policy](#). It provides a status update and rating for all actions undertaken during the first year of MAP implementation.

Case Background and CAO Investigation

IFC Investment Overview

In 2013 and 2016, IFC invested US\$13.5m equity in NewGlobe Schools, Inc., which owned Bridge International Academies ("Bridge"), Africa's largest chain of low-cost, private schools (projects #32171, #38733, #39170, and #39224).² The purpose of IFC's investment was to support the expansion of Bridge's network of kindergarten through grade 12 schools³ serving low-income communities in Kenya, as well as Bridge's entrance into three new countries.⁴ At the time of IFC's investment, IFC noted that Bridge operated 211 elementary and secondary schools in Kenya, serving approximately 57,000 students.⁵

¹ IFC Management Progress Report, Bridge-04 p1. Available here: <https://officecao.org/3FQXVED>.

² IFC, 2013, SII. Available here: <https://officecao.org/3zVfgZL>.

³ IEG, June 2022, An Evaluation of International Finance Corporation Investments in K-12 Private Schools.

⁴ IFC, October 30, 2013, SII. Available here: <https://officecao.org/3zVfgZL>. IFC's support of Bridge was executed through Bridge's Delaware parent company NewGlobe Schools, which established Bridge in 2011 as its wholly owned Kenyan subsidiary.

⁵ IFC, October 2013, SII Project Description. Available here: <https://officecao.org/3zVfgZL>.

After 10 years of supervision, and following a World Bank Group shift away from funding for-profit schools, IFC exited its investment in NewGlobe Schools, Inc., effective March 3, 2022. IFC remained indirectly exposed to Bridge until February 2024 through its investment in the education-focused equity fund *Learn Capital Venture Partners III LP* (Learn Capital III) which held equity in NewGlobe Schools.

CAO Bridge-04 Investigation

In September 2020, CAO's Director General initiated a compliance appraisal to consider child sexual abuse allegations that CAO had been made aware of in February 2020 during a compliance investigation mission to Kenya regarding the separate Bridge-01 complaint.⁶ CAO completed its [appraisal report](#) in December 2020, which determined that an investigation was merited, and initiated the investigation in January 2021.⁷

Investigation Focus and Findings of Non-Compliance

CAO's investigation focused on IFC's oversight of risks and impacts related to child safeguarding and protection⁸, with particular attention to child sexual abuse in Bridge's Kenyan academies.⁹ CAO completed the investigation and submitted its report to the Board on October 3, 2023. The investigation found that IFC failed to meet its environmental and social (E&S) requirements under the Sustainability Policy and Performance Standards 1 and 4 on Assessment and Management of Environmental and Social Risks and Impacts, and Community Health, Safety, and Security, respectively.

Specifically, during E&S due diligence before investing in Bridge, IFC did not consider the project's potential child sexual abuse risks or consider the client's capacity to meet related E&S requirements. During supervision, IFC failed to regularly monitor or substantively address with Bridge project-related child sexual abuse (CSA) and gender-based violence (GBV) risks and impacts. IFC's supervision of such risks and impacts improved after CAO reported to IFC information about CSA incidents linked to Bridge in February 2020. However, CAO found that IFC's supervision efforts continued to fall short of its obligations because, among other issues, it did not take adequate steps to guarantee that the client's child protection and safeguarding approach was consistent with the Performance Standards. Prior

⁶ In April 2018, CAO received a complaint from the East Africa Centre for Human Rights (EACHRights), a Kenyan NGO, on behalf of current and former parents and teachers regarding IFC's investment in Bridge schools in Kenya (The Bridge-01 complaint). The Bridge-01 complaint was transferred to CAO's compliance function for appraisal and CAO initiated a compliance investigation in October 2019. In February 2020 and as part of the Bridge-01 investigation process, CAO staff traveled to Kenya where the team spoke with complainants and community members, as well as client representatives and local authorities. In discussions with CAO, community members in Nairobi reported knowledge of 15 survivors of child sexual abuse at the hands of two Bridge teachers and raised concerns about other child safeguarding issues at Bridge schools in Kenya.

⁷ CAO, December 23, 2020, Bridge-04 Compliance Appraisal: Summary of Results, p. 16. Available here: <https://officecao.org/45gHQIK>.

⁸ **Child safeguarding** refers to all the actions a company takes to keep all children they come into contact with safe, and includes proactive measures to ensure children do not come to harm as a result of any direct or indirect contact with the company. Child safeguarding encompasses the prevention of physical, sexual, and emotional abuse, neglect and maltreatment of children by employees and other persons whom the company is responsible for, including contractors, business partners, visitors to premises, and volunteers.

Child protection is an important part of safeguarding and refers to the actions a company takes to address a specific concern that a particular child is at risk of significant harm due to her or his contact with corporate actors, business partners, products, or services. Child protection is essential if there is a concern that a child is being abused or his or her safety is compromised.

⁹ CAO, October 21, 2021, Bridge-04 Compliance Investigation Terms of Reference. Available here: <https://officecao.org/4j7Jjyc>.

to exiting the investment in 2022, IFC also failed to work with the client to address child sexual abuse risks and impacts as required by the Sustainability Policy.

Findings of Harm

CAO found 23 incidents of child sexual abuse during its investigation that were known to IFC throughout the life of the investment. Of these 23 incidents, all but one took place during project supervision, when IFC should have worked with the client to develop and implement measures to assess and manage risks and impacts related to child safeguarding and protection.

Recommendations to IFC

CAO's 2023 investigation report included seven recommendations, both project-specific and institutional, for IFC to consider in its Management Action Plan aimed at remediating the harm caused by the Bridge investment. The recommendations are summarized below:

1. Provide remediation for survivors of child sexual abuse. IFC should work with Bridge to establish a facility to support a claims process for survivors and their families to receive remedy, including counseling, healthcare support, community reintegration support, funding for and referrals to legal services, a mechanism that allows survivors to come forward, and financial compensation, as appropriate.
2. Strengthen community response to CSA and GBV against children within project communities.
3. Undertake a review of its portfolio 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.
4. Strengthen and clarify E&S provisions concerning children, as well as gender- and sex-differentiated harm, within the Sustainability Framework.
5. Undertake institution-wide capacity building efforts to prevent CSA and overlapping forms of GBV from occurring in its investment projects.
6. Establish a global GBV task force to advise IFC.
7. Clarify expectations for project compliance with IFC's Performance Standards when planning an exit.

Learn Capital 01-04 Complaints

Between June and August 2023, former Bridge students filed four complaints stating that they were sexually abused and harassed by a teacher while enrolled at a Bridge school in Kenya. Three of the four complainants stated that the school took no action after they informed the administration of the abuse and harassment. CAO considered these incidents during the Bridge-04 Investigation.

IFC had terminated its direct investment in Bridge when these four complaints were filed. CAO therefore referenced them as Learn Capital 01-04, based on IFC's continuing indirect exposure to Bridge through its investment in the education-focused equity fund *Learn Capital*

Venture Partners III LP (Learn Capital III) which held equity in NewGlobe Schools. In August 2024, approximately five months after the Bridge-04 MAP received Board approval, CAO merged the Learn Capital 01-04 complaints with its compliance monitoring of IFC's implementation of the Bridge-04 MAP. The reasons for this decision, described in detail in CAO's [compliance appraisal](#), included the substantial similarities between the issues raised in the Learn Capital complaints and Bridge-04 compliance process.

The section below summarizes IFC's Management Action Plan commitments. It then describes CAO's monitoring of IFC's efforts over the past year to implement initial MAP actions.

2. IFC Management Report and Management Action Plan

IFC submitted a Management Report (MR) and Management Action Plan (MAP) in response to CAO's Bridge-04 compliance investigation, which the Board approved in March 2024.¹⁰

In its MR, IFC made clear that child sexual abuse is unacceptable in any project it finances and acknowledged that IFC should have better anticipated the risks to children from its investments in Bridge. Specifically, IFC acknowledged that child sexual abuse risks were not adequately considered during its pre-investment E&S due diligence as well as the first few years of supervision (2016-2020). IFC stated that it made significant improvements once CAO identified CSA incidents in February 2020 and brought them to IFC's attention.¹¹ Expressing gratitude for CAO's investigation, IFC confirmed that it largely agreed with CAO's findings and recommendations.

IFC's Management Action Plan included actions to address all project-specific and systemic recommendations proposed by CAO. In taking these actions, IFC stated its primary objectives as twofold: a) establishing an Emergency Child Protection Response (ECPR) program [to remedy the harms to survivors of child sexual abuse in counties where Bridge operated or operates]; and b) strengthening IFC's expertise and practice in managing risks of GBV and child sexual abuse in investments. IFC committed to supporting the ECPR program in Kenya for a minimum of three and a maximum of ten years.

¹⁰ IFC Management Report and Management Action Plan in relation to the CAO Compliance Investigation Report on Bridge 04, March 7, 2024, <https://officecao.org/3zO6P2r>.

¹¹ Ibid, p.10.

MAP Actions

IFC's MAP is made up of two project-level actions and three institutional level actions, each with deliverables and timelines, summarized below:

- **Project-level action 1: The design and implementation of a remediation program for survivors of child sexual abuse.** The design of the program was expected to be completed by IFC within the first six-months, with the implementation of the remediation program starting immediately thereafter and lasting between three and ten years.
- **Project-level action 2: Activities aimed at strengthening prevention and outreach to populations at risk of child sexual abuse.** Prevention activities will complement the remediation program. IFC's plan to operationalize activities and the training of community mentors is expected by the end of June 2026; the implementation of prevention activities will last as long as the remediation program.
- **Institutional-level action 1: Multiple actions aimed at improving existing risk and impact management measures pertaining to child sexual abuse and GBV.** These include a portfolio-wide review to identify risks in IFC's global investments and determine appropriate risk management measures when needed, and revisions to the E&S provisions in IFC templates for investment agreements with clients.
- **Institutional-level action 2: Institution-wide capacity building efforts.** This includes both training and hiring of staff with the objective of strengthening IFC's capacity to manage child sexual abuse and GBV risks and impacts.
- **Institutional-level action 3: Establishment of an Advisory Committee.** Among other tasks, this committee will support the design and implementation of the remediation and prevention program in Kenya and the development of IFC's Guidance Note on Child Safeguarding in Business.

The following pages provide a more detailed summary of the Bridge-04 MAP, including actions, deliverables, and timelines.

#	Action	Deliverable/Timeline
Project-specific Actions		
1	<p>IFC will directly fund a remediation program (subject to design, evaluation and milestones) – referred to by CAO as ECPR – for survivors of child sexual abuse in counties where Bridge operated or currently operates in Kenya.</p> <p>The remediation program will build on established service delivery programs, led by relevant international agencies and/or reputable international or local NGOs with a solid track record and relevant child protection and GBV expertise in delivery of survivor-centered prevention and response services. Services will be open for any survivor of child sexual abuse to use, regardless of the environment in which the abuse occurred. The scope and cost of this program will be determined in design phase, based on the service-gap analysis and further consultation with potential partners, and subject to evaluation and exit milestones. The overall duration of the program will be a minimum of 3 years to be adjusted based on the outcomes of the design phase including consideration of the average timeframe taken by survivors to disclose their abuse and the proposed exit strategy. It will be updated based on progress against metrics defined during the design phase of the program, in consultation with the CAO and the Board and may not exceed 10 years.</p> <p>By partnering with established, competent service providers with existing programs in target locations, IFC will be able to support the strengthening of services and enable the sustainability of these services after IFC concluded its program, in accordance with a well-designed exit strategy. The remediation will aim to primarily support the psychosocial needs of survivors of child sexual abuse, without discriminating between cases which may be associated with Bridge schools and those associated with other environments. The remediation will be firmly rooted in gender analysis and apply a rights-based and survivor-centered approach. Services will be open to all genders, while prevention activities will focus on at-risk adolescent girls, which evidence shows are disproportionately at risk of sexual abuse, school dropout and child marriage.</p> <p>The remediation program will aim to facilitate the engagement and inclusion of available governmental services – or provide services if not available – for survivors of child sexual abuse and their families. Modalities to be explored during the design phase (for informed decision making at such time) will include:</p> <ul style="list-style-type: none"> (i) Psychosocial support and counseling services for survivors of child sexual abuse. (ii) Health care support, including adolescent sexual and reproductive health services. (iii) Community reintegration support to facilitate survivors' continued education and/or age-appropriate efforts to pursue gainful employment. (iv) Integration with child-sensitive, survivor-centered quality legal services that are competent in dealing with crimes against children for survivors seeking advice or legal redress against perpetrators. <p>Financial support with the objective of enabling survivors of child sexual abuse to access the services covered in the program would be provided, on a case-by-case basis, as needed, after careful assessment. The modalities of such financial support and eligibility criteria to access it will be determined in the design phase after consultation with stakeholders including local and international child protection experts, local and international non-governmental organizations active in survivors support, and survivors of child sexual abuse that wish to come forward. This could include for example, cash payments for transportation and incidentals, as well as for lost wages resulting from accessing program services, and reimbursements for directly related past expenses that would otherwise have been eligible under the program, in accordance with the program procedures and subject to verification.</p> <p>Prevention activities are further described in Action 2 below.</p> <p>The design phase of the project will determine the length of the program, budget, logistics and other important decisions based on informed assessment and consultations. IFC will consult Bridge and other stakeholders – including survivors of child sexual abuse if they wish so — for the design and implementation of the project, as appropriate.</p>	<p>1a. Project Preparation Plan for the design phase</p> <ul style="list-style-type: none"> • Stakeholder engagement / community consultation plan <p>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.</p> <ul style="list-style-type: none"> • Mapping / Service-gap analysis • Situational analysis • Selection of implementation partner/s • Implementation Plan • Logistics Plan <p><i>Timeframe:</i> 6 months from start, subject to required (including government) approval processes</p> <p>1b. Implementation</p> <ul style="list-style-type: none"> • Technical guidance materials • Service protocols • Information, education and communications materials <p><i>Timeframe:</i> Over the lifespan of the program</p> <p>1c. Results Framework (indicative dates to be adjusted based on the final design of the program) <i>Timeframe:</i> FY25</p> <p>Mid-term review <i>Timeframe:</i> FY26</p> <p>Final evaluation <i>Timeframe:</i> FY27</p> <p>1d. Sustainability, Transfer and Exit Strategy Transition /exit plan <i>Timeframe:</i> Midterm review FY26/27</p>

2	<p>In parallel with Action 1, the remediation program will be complemented by “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>This can include (i) community conversations prior to any intervention, and convened regularly throughout the program; (ii) support for efforts to reduce social acceptance of GBV and child sexual abuse through community-based behavioral change interventions; (iii) strengthening referral systems for youth at risk; (iv) enhancing the capacity of community-based facilitators such as community health promoters, county council leaders, crime preventers, and religious and cultural leaders to respond to GBV; (v) girls’ empowerment and life skills training, and school reintegration for girls who dropped out.</p> <p>Activities will involve families and all genders.</p>	<p>2a. Plan of Action: Outline of prevention interventions using participatory methods <i>Timeframe:</i> FY25</p> <p>2b. Training of community facilitators/mentors <i>Timeframe:</i> FY25</p> <p>2c. Implementation (as outlined in Action 1) <i>Timeframe:</i> over program lifecycle</p> <p>Timelines as per Action 1 (indicative dates to be adjusted based on the final design of the program)</p> <p>Implementation Plan – <i>Timeframe:</i> FY25</p> <p>Mid-term review <i>Timeframe:</i> FY26</p> <p>Final evaluation <i>Timeframe:</i> FY27</p> <p>Transition /exit plan <i>Timeframe:</i> subject to review in FY26/27</p>
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Institutional-Level Actions

- 3 IFC will:
- Undertake a review of its portfolio to identify child sexual abuse and GBV risks in investments and determine appropriate risk management measures when needed.** The review will apply a child safeguarding and GBV risk-lens, focusing on high-risk sub-sectors in IFC direct investments and IFC's investments in Private Equity Funds. The objective of the review is to identify child sexual abuse and GBV risk in the portfolio and gain insights to enhance mitigation measures at project level. IFC will work with clients identified via the portfolio review to implement corrective measures to address any gaps identified.
 - 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.
 - Update and make mandatory existing Gender and GBV Project Risk screening methodology and relevant guidance to E&S specialists** (i) to include child protection risk screening (ii) digitalize the tool to facilitate systematic usage by project team (iii) increase functionality and enable dashboard systematic monitoring and follow up with project team; and (iv) strengthen a systematic and mandatory implementation of risk-based approach regarding GBV and child sexual abuse prevention and response during E&S due diligence and portfolio monitoring throughout the project cycle.
 - Review and update its 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.
 - Issue a statement to staff on zero tolerance for inaction on or reprisals for addressing GBV or child protection issues** and operationalize it.

3a. 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 manner that is compliant with the AIP.

Timeframe: Q2 FY25

3b. Updated investment agreement templates.

Timeframe: FY25

3c. Updated Gender and GBV Project Risk methodology to include child protection.

GBV and child sexual abuse methodology, digitalization, and guidance.

Timeframe: Q1FY25

3d. Updated questionnaires and annual monitoring templates to include child safeguarding.

Timeframe: Q1 FY25

3e. Statement

Timeframe: FY24

4	<p>a. IFC will anchor its activities for addressing GBV including child sexual abuse for Africa 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 Europe/MCT. Staff positions will be complemented by experts under short term contracts.</p> <p>b. 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 specialists consultant competency-based program and roster so that a pre-identified network of local GBV consultants is available at country and regional levels. <p>c. 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 MFIs 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 for 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>4. Capacity building deliverables</p> <p>4a. Increase GBV specialist staffing <i>Timeframe: Q4 FY24</i></p> <p>4b.1 Annual training plan <i>Timeframe: 1Q FY25</i></p> <p>4b.2 Regional external GBV consultants' workshops <i>Timeframe: FY 25</i></p> <p>4c. Tools and guidance</p> <p>4c.1 Good Practice Note on Child Safeguarding in Business <i>Timeframe: FY25</i></p> <p>4c.2 GBV Company Diagnostic Tool <i>Timeframe: FY25</i></p> <p>4c.3 Guidance to IFC Nominee Directors <i>Timeframe: FY24 and on-going for new nominees as they join</i></p>
5	<p>IFC will set up an Advisory Committee including relevant international and local, internal and external to the World Bank Group GBV and child protection experts to support the design and implementation of the remediation and prevention program in Kenya, and the development of the Child Protection Guidance Note.</p>	<p>Advisory Committee in place and functioning. <i>Timeframe: Q4FY24</i></p>

3. CAO Monitoring Activities

The IFC Board of Directors asked CAO to closely monitor the actions set out in the MAP. In response, CAO developed and has implemented a monitoring plan that was shared with IFC in April 2024. Summarized in Annex 2, the plan includes indicators to measure the effective implementation of key IFC activities.

CAO's monitoring activities over the past year included a mission to Kenya in April 2024, coinciding with the start of IFC's implementation of the MAP actions outlined above. Beginning in August 2024, CAO has held biweekly meetings with IFC to discuss implementation (see Annex 1 for detailed information on CAO-IFC engagement). In addition, CAO has held ongoing conversations with the complainants and their representatives to hear their feedback on the MAP's implementation as well as discussions with local and international experts on child safeguarding and protection.

CAO notes that IFC has made progress on MAP implementation and submitted two Management Progress Reports in October 2024 and March 2025.

4. CAO Observations of IFC MAP Implementation

This section presents CAO's assessment of the main activities conducted by IFC during the first year of MAP implementation. More details of these activities are publicly available in the Management Progress Reports developed by IFC in October 2024 and March 2025 - published on the CAO website.¹²

Based on the analysis below, this first monitoring period for the Bridge-04/Learn Capital 1-4 MAP resulted in CAO closing three IFC action items with ratings of Satisfactory and Partially Satisfactory (two actions). An additional eight IFC action items remain open with ratings of Partially Satisfactory, Too Early to Tell, and Unsatisfactory. CAO also suggests some next steps to IFC for several action items, as detailed below.

¹² See, IFC, Management Progress Report, Bridge International Academies, October 7, 2024, <https://officecao.org/3SKcWuC> and IFC Management Progress Report, March 10, 2025, <https://officecao.org/3Fk3yLd>.

4.1. In-Country Remediation and Prevention Program for Survivors of Child Sexual Abuse¹³

I. Summary of IFC Update: Action Item A.1.a. Stakeholder Engagement and Community Consultation Activities [that will inform the design of the Remediation Program for Survivors of Child Sexual Abuse and the design of community prevention interventions]

IFC's project-level actions during this first monitoring period focused on consultations to gather feedback that would inform the design of the remediation program for survivors of child sexual abuse. IFC commissioned the United Nations Population Fund (UNFPA) to lead the consultation process and in its March 2025 Management Progress Report (MPR), informed that the originally planned consultation process had been completed.¹⁴ In the same MPR, IFC also mentioned that it was planning additional consultations to reach more survivors of child sexual abuse in schools, as well as education sector stakeholders. IFC added that this extra outreach resulted from a request from the CSOs representing the four complainants whose complaints had been processed under the Learn Capital 1-4 compliance appraisal and subsequently merged with the Bridge-04 monitoring process.¹⁵

On April 22, 2025, IFC informed CAO that the additional consultation process had closed and shared its preliminary results in a draft consultation report.¹⁶ CAO considers IFC's extension of the consultation process a positive development that allowed for additional feedback from young adults (aged 18–24), education sector stakeholders, and survivors of child sexual abuse.

CAO reviewed IFC's reports of the feedback that it received from participants during the initial consultation period (August 2 to September 16, 2024) and the additional meetings (March 23 to April 4, 2025). CAO also spoke independently with a small number of participants and, after multiple requests to participate in meetings and with IFC's approval, participated in the "validation meeting" held on the last day of the final consultation event. From its assessment of available information, CAO believes that IFC's process was survivor-centric and aligned with international good practice related to consultations with survivors.¹⁷ CAO was also able

¹³ CAO's investigation concluded that IFC did not consider the potential child sexual abuse risks when it invested in Bridge and that, during supervision, IFC failed to regularly monitor or substantively address project-related child sexual abuse and GBV risks and impacts. By the time of IFC's exit in March 2022, IFC was aware of multiple incidents of child sexual abuse that happened after IFC had invested in Bridge.

¹⁴ On July 9 and July 16, 2024, CAO requested that IFC share the schedule for the consultations to gather stakeholder feedback to inform the remediation program for survivors of child sexual abuse. IFC did not share the schedule until August 6, one week after consultations began. On several occasions between July and August of 2024, CAO asked to attend at least one of the meetings held in Kenya as an observer. All these requests were denied by IFC, which conveyed that UNFPA would not allow CAO to attend any of the meetings (including those where survivors would not be present) because it went against best practices on GBV/CSA to include external observers. CAO did not press further despite IFC and UNFPA's view not being shared by independent GBV/CSA experts consulted by CAO. CAO's lack of participation in the consultation meetings held from August 2 to September 16 2024 prevented CAO from having firsthand knowledge that it could use to assess the effectiveness of the consultations held during that period.

¹⁵ The CSOs are: Accountability Council, Inclusive Development International, Oxfam International, and Wangu Kanja Foundation.

¹⁶ An earlier consultation report covering the initial consultation meetings, as well as the stand-alone consultation meeting held with the four complainants, was shared with CAO on January 30, 2025.

¹⁷ Among other actions, consultation participants seem to have been informed, upfront, that their participation was voluntary and that they had the right to withdraw at any time. Consultation meetings also appear to have been staffed with a specialized counselor and included information about services that could be accessed should a participant wish to do so.

to confirm the involvement of, and feedback from, the four complainants who are part of this monitoring process.¹⁸ CAO was not able to confirm that Bridge survivors generally received an adequate opportunity to participate in the consultation process. Nevertheless, CAO believes that the extended consultation process, which focused on gathering feedback from survivors, young adults, and education-sector stakeholders, likely reflects the views of survivors from low-income, private school settings, similar to those in Bridge schools.

In its review of consultation reports, CAO identified important feedback from participants that will be useful for the development of the remediation program by IFC and its expert partners. This feedback included: a thorough explanation of the importance and uses of cash support for survivors to access services; the pivotal role of psychosocial services in a survivor's journey toward recovery; and the importance of providing legal services for survivors to understand their rights and navigate the judicial process.

Finally, CAO notes that participants were not given an opportunity to evaluate the quality of the various individual consultation meetings held during the consultation process. Only a small number of stakeholders were able to provide feedback on the overall effectiveness of the consultation process during the validation meeting held the final day of consultations.

Suggested next steps:

In line with IFC's Good Practice Note on Stakeholder Engagement and in the interest of transparency, CAO urges IFC to disclose a summary of the key feedback received during the consultation processes described above. IFC should release this information in a manner that safeguards participant anonymity and confidentiality, such as by only disclosing aggregated feedback.¹⁹ CAO believes that this disclosure will enhance public trust and confidence in the forthcoming remediation program design.

Since the consultation process has ended, CAO considers this action item closed and rates its implementation as partially satisfactorily. While the process was survivor-centric and largely involved a diverse array of stakeholders, there remains uncertainty regarding whether Bridge survivors (besides the four complainants) were adequately provided with opportunities to participate in the consultation process. Additionally, stakeholders were not afforded the opportunity to evaluate the effectiveness of the individual consultation meetings.

CAO now moves its attention to the draft preliminary design of the remediation program, which IFC made available to CAO for its review and feedback on June 3, 2025.

Status and Action Rating: **Closed: Partially Satisfactory.**

¹⁸ Early versions of the consultation report shared with CAO include a section where the feedback provided by the four complainants is disaggregated from the feedback provided by other stakeholders. Providing relevant information related to the specific needs of the complainants would be valuable to remediate the project-related harm in this case.

¹⁹ Good international practice pertaining to the disclosure of feedback from consultations with survivors indicates that information must be handled with the utmost care, always prioritizing the safety of survivors. Among other principles of good international practice is disclosing information gathered during consultations in aggregate and, in cases where consent has been granted to speak about a specific survivor's experience, to use pseudonyms. A recent example is "The Report of the Independent Inquiry into Child Sexual Abuse," published in 2022 and found here: <https://officecao.org/4dVHhjG>.

CAO Monitoring Plan Indicators

Key IFC Deliverable	Select Key Indicators to Assess Effective Implementation	Monitoring Type	Monitoring Results
Stakeholder Consultations	a. Process is survivor-centric and adheres to good international practice. b. Captures inputs of Bridge survivors that wish to come forward. c. Includes a wide range of stakeholders, including local and international organizations, and local and international child protection experts. d. Is rated satisfactorily by participants.	Ex-Ante	a. Satisfactory. b. Partially satisfactory. c. Satisfactory d. Undetermined.

4.2. Institutional Strengthening

II. Summary of IFC Update: Action Item C.1.a. Portfolio Review of IFC's Existing Investments to Identify Child Sexual Abuse and GBV Risks in Investments and Determine Any Risk Management Measures that Need to be Implemented

CAO's compliance investigation report recommended that IFC undertake a review of its portfolio 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. In its management response, IFC committed to implementing CAO's recommendation in full.

IFC's second Management Progress Report (MPR) from March 2025 states that the portfolio review has been completed and that IFC will share an anonymized, confidential summary report with CAO. Through June 2025, neither CAO nor the IFC Board of Directors had received this summary. CAO is therefore unable at this stage to assess effective implementation of the portfolio review.

Status and Action Rating: **Open:** Too Early to Tell.

Key Monitoring Plan Indicators

Key IFC Deliverable	Select Key Indicators to Assess Effective Implementation	Monitoring Type	Monitoring Results
Portfolio Review Summary Report	Adequacy of actions in response to findings.	Ex-post	Pending: Portfolio Review Summary has not been shared

III. Summary of IFC Update: Action Items C.2.a. Updated Investment Agreement Templates; C.3.a. Updated Gender and GBV Project Risk Methodology; and C.4.a. Updated Questionnaires and Annual Monitoring Templates.

CAO's investigation concluded that IFC did not consider the potential child sexual abuse risks when it invested in Bridge and recommended that IFC undertake institution-wide efforts to prevent child sexual abuse and overlapping forms of GBV from occurring in its investments. In response, IFC committed to review and update existing key documents to explicitly address issues pertaining to GBV and child safeguarding and protection.

In its March 2025 MPR, IFC states that it has updated its legal covenants in client investment agreement templates. These templates now include language on child safeguarding and protection, as do its E&S due diligence questionnaires for clients.²⁰ Additional related updates include: the addition of child protection risk screening in IFC's GBV project risk screening methodology; the inclusion of child protection risk screening in the updated GBV questionnaire; and the addition of child safeguarding to the annual monitoring templates. CAO requested access to the documents above and was promptly granted access.

IFC's enhancements to its legal covenants, internal risk assessment tools, and procedures are an important step toward preventing future instances of child sexual abuse and gender-based violence in the investments that it finances. CAO believes that these enhancements, in conjunction with robust staff training, have the potential to improve IFC's performance in managing risks and impacts related to CSA and GBV. CAO will continue to closely follow their operationalization in IFC's investments to assess their effectiveness.

Status and Action Rating: **Closed: Satisfactory.**

Key Monitoring Plan Indicators

Key IFC Deliverable	Select Key Indicators to Assess Effective Implementation	Monitoring Type	Monitoring Results
Updated investment agreement templates	E&S provisions are: <ul style="list-style-type: none"> • CSA specific • Designed to effectively minimize, report and document, and respond to CSA risks; and • enforceable. 	Ex-post	Satisfactory
Updated methodology that includes child protection and safeguarding elements	<ul style="list-style-type: none"> • Updated project risk screening tool includes CSA considerations. • There is a mechanism in place to ensure mandatory application. 	Ex-post	Satisfactory
Updated questionnaires and annual monitoring template that includes child protection and safeguarding	<ul style="list-style-type: none"> • E&S due diligence questionnaires and reporting templates include considerations pertaining to CSA risks. 	Ex-post	Satisfactory

²⁰ IFC investment agreements have been enhanced in two critical areas. First, ensuring that incidents related to Sexual Exploitation and Abuse (SEA) or child protection are disclosed during due diligence. Second, the client agreement templates have been updated to include requirements for clients to report SEA or child protection incidents. This addition outlines a clear procedure for clients to notify IFC about such incidents, ensuring prompt and effective communication. In the E&S due diligence questionnaires, several questions pertaining to identifying risks to children were included, and there is a requirement to share relevant documentation such as the company's Child Safeguarding/Protection Policy.

IV. Summary of IFC Update: Action Items C.5.a. Issuance of Zero Tolerance Statements for Inaction on or Reprisals for Addressing GBV in Child Protection Issues

On March 13, 2024, World Bank Group President Banga sent an institution-wide email informing staff of CAO's then upcoming compliance investigation report regarding IFC's investment in Bridge. It stated that "[e]arly on [in its investment in Bridge], IFC received reports of child sexual abuse, but protocols were not followed, and children were hurt. Put simply, mistakes were made." The following day, IFC Managing Director Diop sent an email expanding President Banga's message. That email stated the following: **"I want to be clear: IFC has zero tolerance for gender-based violence, child sexual abuse, or abuse of any kind"** (bold in original). The email from Mr. Diop also included a series of steps that IFC would take to "comprehensively respond to the risks that came to light through the [Bridge] case." These included "embedding child protection and GBV measures into [IFC's] Environmental and Social (E&S) policies and procedures" in the forthcoming review and update of IFC's Sustainability Framework and "provide[ing] mandatory training to all operations staff to enhance their understanding of non-financial risks, with a particular emphasis on GBV and child protection."

Regarding the operationalization of the zero-tolerance statement, IFC reports that in January 2025 it updated its E&S Review Procedures (ESRP) for staff to include step-by-step guidance on how to respond to significant adverse E&S events in projects (see ESRP paras 7.1-7.5). CAO reviewed the January 2025 ESRP and believes that the new section, which formalizes and describes the institutional steps staff must take to report and escalate significant E&S events,²¹ is an improvement from prior ESRPs, which had no formalized procedure for such incidents. However, CAO notes that the reporting procedure does not include an anonymous reporting channel for staff use.

In its current form, the procedure requires staff working directly on an investment to notify the client and IFC of significant adverse incidents when they are made aware of such events. CAO notes that staff may not always feel comfortable reporting such incidents,²² and suggests that IFC include means to confidentially and anonymously report and escalate significant incidents.²³

CAO also notes that the new procedure may not be appropriate for cases of child sexual abuse in projects, where keeping information confidential from the client may be appropriate and where local law enforcement should also be made aware of such incidents. CAO suggests that IFC develop a separate protocol to respond to incidents of GBV/child sexual abuse in the investments that it finances.

CAO will continue to monitor how the zero-tolerance statement is implemented.

²¹ The ESRP defines a *Significant Adverse E&S Event* as any event related to an IFC project with material impact on project workers, project-affected communities or the environment. Examples of such adverse events include fatalities, serious accidents, and injuries; social impacts from labor influx; sexual assault, sexual exploitation or sexual abuse (SEA) or other forms of gender-based violence (GBV); major environmental contamination; loss of biodiversity or critical habitat; loss of physical cultural resources; and loss of access to community resources.

²² This was the case for some individuals that worked on the Bridge International Academies investment.

²³ See, for example, the EU practice to promote whistleblower procedures for persons who work for a public or private organization. There is an EU directive (Directive (EU) 2019/1937) that promotes reporting any breach to EU law anonymously. See: <https://officecao.org/3HQwJSc>.

Status and Action Rating: **Open:** Partially satisfactory.

Key Monitoring Plan Indicators

Key IFC Deliverable	Select Key Indicators to Assess Effective Implementation	Monitoring Type	Monitoring Results
Statement and evidence of operationalization	<ul style="list-style-type: none"> Zero tolerance statement is issued and operationalized through elements such as: <ul style="list-style-type: none"> Procedures for IFC staff and consultants to engage clients when issues pertaining to GBV and CSA arise in projects. Implementation of an anonymous and confidential reporting channel (e.g. a hotline or email) for IFC staff and consultants, as well any member of the public, to report allegations of GBV/CSA related to an IFC investment. Protocols for Management to address issues pertaining to GBV/CSA. Measures to create a cultural shift so that staff and consultants feel empowered to raise issues when they arise (including sanctioning and reward mechanisms). 	Ex-post	<p>Statement: Satisfactory</p> <p>Measures to create a cultural shift: Partially satisfactory</p>

V. Summary of IFC Update: D.1.a. Increasing GBV Specialist Staff

In its October 2024 Management Progress Report, IFC stated that it had hired five new staff as regional GBV specialists and one consultant with child protection and safeguarding expertise to strengthen its capacity to prevent child sexual abuse and overlapping forms of GBV in its investments. IFC shared with CAO both the terms of reference used for staff hiring and the CVs of its recent hires.

CAO considers these IFC hirings an important first step in ensuring it has sufficient GBV expertise to manage risks and impacts pertaining to GBV in existing and new investments. At the same time, CAO notes that IFC hired only one consultant with specialized expertise in child protection. While the management of risks and impacts pertaining to child sexual abuse have elements in common with managing GBV risks and impacts, the required knowledge and skillset are not the same nor interchangeable. In CAO's view, IFC should provide capacity-building opportunities on child protection and safeguarding to its recent hires to ensure they have the necessary knowledge to offer expert advice on these issues within their regional investment portfolio.

CAO will no longer monitor this MAP action item.

Status and Action Rating: **Closed:** Partially satisfactory.

Key Monitoring Plan Indicators

Key IFC Deliverable	Select Key Indicators to Assess Effective Implementation	Monitoring Type	Monitoring Results
Staff and STC Hiring	<ul style="list-style-type: none"> Newly hired staff and consultants have significant experience in child protection. 	Ex-post	Partially satisfactory

VI. Summary of IFC Update: D.2.a. Annual Training Plan, D.2.b. Regional External GBV Consultant's Workshops, D.3.a. Good Practice Note on Child Safeguarding in Business, D.3.b. GBV Company Diagnostic Tool, D.3.c. Guidance to IFC Nominee Directors

Regarding its MAP commitment to boost institutional capacity on child protection and safeguarding issues, IFC included multiple updates in its October 2024 and March 2025 MPRs. These included:

- The completion of its annual training plan (D.2.a.), which now includes mandatory training for IFC staff on child protection and safeguarding, as well as GBV awareness-raising webinars for financial intermediary clients. In its March 2025 MPR, IFC states that several trainings have been held and full implementation will be rolled out in FY26 (July 2025-June 2026).
- The finalization of the training module for external GBV consultants and the completion of a pilot regional training module (D.2.b). IFC originally set the deadline for rolling out the training program across all regions as FY25 but has since pushed it back to FY26.
- The completion of a draft Good Practice Note on Child Safeguarding in Business (D.3.a.) that was commissioned from a specialized consulting firm. In its first MPR, IFC expected the Note's completion by Q2 FY25, but the March 2025 MPR pushed back the completion date to Q4 2025, with the Note under review by the Advisory Committee.
- The finalization and piloting of the non-digital version of the GBV Company Diagnostic Tool (D.3.b.), which IFC reports is currently being used by some clients. IFC expects to launch the digital version in FY26.
- The completion of two training sessions on GBV risk governance for IFC Nominee Directors (D.3.c), held in January and June of 2024. IFC reports that it expects to continue training sessions on GBV risk governance for all future IFC Nominee Directors and to follow up with annual refreshers.

CAO reviewed the draft materials for the annual training program (D.2.a) and those for the training module for external GBV consultants (D.2.b). In response, CAO suggests that IFC revise the draft presentation on "Children and GBV" that is part of mandatory training for IFC staff to fully encompass the risks and impacts faced by children, as not all forms of violence toward children are gender-based.²⁴ Furthermore, CAO suggests that the presentation focus on how measures to prevent violence against children should be incorporated in IFC investment documents. CAO will review the final training material and attend the training sessions before providing its assessment on action items D.2.a and D.2.b. Both actions remain open and will be considered as part of CAO's next monitoring report for this case.

CAO also reviewed a draft of the Good Practice Note on Child Safeguarding in Business (D.3.a). In CAO's view, the draft Note aligns with international good practice on child safeguarding and represents an important first step in developing guidance on how to

²⁴ For example, physical violence includes actions like hitting, slapping, kicking, burning or any other forms of physical harm. It can be perpetrated by parents, caregivers, peers or strangers and can be based on unbalanced physical strength and power. Emotional or psychological violence involves behaviors that harm a child's self-worth or emotional well-being, such as verbal abuse, threats, intimidation, rejection and isolation. These forms of violence can be perpetrated by people who have responsibilities for children's care and might not be motivated by gender norms.

manage risks and impacts on children in the investments that IFC finances. CAO looks forward to receiving an updated draft of the Note and will keep this action item open. Future drafts of the Note will be assessed as part of CAO's monitoring reports.

Lastly, CAO reviewed the completed non-digital version of the GBV Company Diagnostic Tool (D.3.b), as well as final versions of the materials used to train IFC Nominee Directors on GBV risk governance (D.3.c). As stated in its name, this tool focuses on issues pertaining to gender-based violence and not on child protection and safeguarding. Similarly, the materials used to train IFC Nominee Directors on GBV risk governance omit child protection and safeguarding issues. CAO observes that because neither MAP action incorporates good international practice on child protection and safeguarding, they are unlikely to be effective at supporting IFC's efforts to improve the management of investment-related risks to children. CAO urges IFC to revise action items D.3.b and D.3.c to include good international practice pertaining to child protection and safeguarding. Both actions are unsatisfactory, remain open, and will be included in CAO's next monitoring report.

Status and Action Rating:

Actions D.2.a; D.2.b; D.3.a: **Open: Too early to tell.**

Actions D.3.b; D.3.c: **Open: Unsatisfactory.**

Key Monitoring Plan Indicators

Key IFC Deliverable	Select Key Indicators to Assess Effective Implementation	Monitoring Type	Monitoring Results
Capacity Building Programs and Consultancy Roster	<ul style="list-style-type: none"> Annual training and sensitization program for all staff (including consultants) has been designed and is ready to implement. Training content is aligned with international good practice. Regional external GBV specialist consultant competency-based program and roster has been designed and is ready to implement. 	Ex-post	Too early to tell
Guidance Material: (i) Good Practice Note on Child Safeguarding (ii) GBV company diagnostic tool (iii) Guidance for IFC nominee directors	<ul style="list-style-type: none"> New tools and guidance reflect international good practice on child protection and have feedback from the Advisory Committee. 	Ex-post	(i) Too early to tell (ii) Unsatisfactory (iii) Unsatisfactory

VII. Summary of IFC Update: E.1.a. Advisory Committee to Support the Design and Implementation of the Remediation Program and the Development of the Good Practice Note on Child Safeguarding in Business is in Place and Functioning

IFC's MAP for this case committed to appointing an Advisory Committee (AC) of experts to support its project level and institutional actions. IFC reported to CAO that the Advisory Committee launched in August 2024 with a Secretariat established to support its work and monthly online meetings²⁵. Criteria for member appointments 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, and demonstrated empathy and sensitivity toward survivors.

IFC's March 2025 MPR stated that the Advisory Committee had discussed early program design options, providing feedback and guidance to IFC, UNFPA, and UNICEF, and would next review the Good Practice Note on Child Safeguarding and the [remediation] program design. IFC conveyed to CAO outside of its MPR that the AC would not make the advice provided to IFC management public.

After CAO reviewed the Committee's initial composition, it suggested that IFC increase the number of members from Kenya as well as the number of experts on child protection and safeguarding. While the Committee's original membership included highly competent technical experts on GBV, four of the seven members did not have experience on issues pertaining to children, and only two were based in Kenya (one of them being a Kenyan national). In February 2025, two new experts joined the Advisory Committee: a Kenyan NGO representative with experience on issues pertaining to children; and an international expert with child protection experience.

CAO welcomes the Committee's new composition and hopes that IFC will reconsider its position not to share the advice provided by the Advisory Committee to IFC management. CAO believes that reviewing the committee's advice is key to assessing the effectiveness of its contributions.²⁶

CAO determined that this action item was satisfactorily implemented by the IFC. However, since it remains to be seen whether the Committee will effectively contribute to the design of the remediation program and the child protection guidance note, CAO will keep this action item open and introduce a new related indicator for the next monitoring phase.

Status and Action Rating: **Open:** Creation of AC is satisfactory/ Effectiveness of the AC's work is too early to tell.

²⁵ IFC Monitoring Progress Report, March 10, 2025.

²⁶ CAO also requested the minutes of the Advisory Committee's meetings, but the request was rejected due to confidentiality concerns raised by the Advisory Committee to IFC.

Key Monitoring Plan Indicators

Key IFC Deliverable	Select Key Indicators to Assess Effective Implementation	Monitoring Type	Monitoring Results
Advisory Committee	<ul style="list-style-type: none"> Advisory Committee in place with wide range of recognized local and international expertise in GBV and child protection. 	Ex-ante	Satisfactory

5. Complainant Comments

On April 28, 2025, CAO received comments from the four Learn Capital 01-04 complainants, through their representatives, on the first year of IFC's MAP implementation. In these comments, the four former Bridge students who suffered sexual abuse articulate significant concerns regarding their involvement in the stakeholder engagement process for the design of the remediation program. Specifically, they note that their representatives were not allowed to attend any consultation meetings beyond one session IFC held specifically for them in November 2024, and that all other meetings with IFC were largely informational updates with limited opportunities for substantive feedback.

Through their representatives, the complainants also expressed their concern that the UNFPA-led stakeholder engagement process did not adequately ensure the participation of Bridge survivors, emphasizing that it had failed to create sufficient space for Bridge survivors to self-identify and provide input. The complainants shared that the Remediation Program was being developed without meaningful input from Bridge survivors, including the four complainants, and would likely not deliver effective remedy to Bridge survivors. In their view, including feedback from survivors is critical for effective MAP implementation and this entails disclosing all relevant information so that survivors can participate in an informed and meaningful manner.

The complainants also highlighted what they considered a lack of transparency by IFC in sharing key documents, such as the Stakeholder Engagement Plan and consultation design materials. In their view, this created an information deficit that hindered their meaningful input and relegated their involvement to being reactive and post hoc. While the complainants appreciated the extension of stakeholder consultations based on their feedback, they further noted that they were not aware of the start or process of the extended consultations until after the fact. Nor were they invited to participate in any of the additional meetings, including the validation meeting. The complainants, through their representatives, also expressed their concerns that an Advisory Committee exists that could have influence over the remediation program's structure and design, yet its membership and mandate remain undisclosed. Having shared these concerns with IFC, the complainants look forward to a more transparent and inclusive process going forward.

CAO also notes that, in one section of the comments, the Wangu Kanja Foundation (WKF), a representative of the complainants, denounces what it terms IFC's misrepresentation in the March 2025 Monitoring Progress Report of WKF's involvement in the consultations to legitimize what the foundation considers a flawed consultation process. WKF emphasizes

that its role was limited to convening survivors from *The Survivors of Sexual Violence in Kenya Network*, and that it did not have any influence over the consultation structure. Furthermore, WKF states that it declined a request from UNFPA to mobilize survivors for the extended consultation period due to its concerns regarding the ineffectiveness of the first consultation process.

6. Conclusion

Based on the information included in section 4, CAO will close three IFC action items with ratings of Satisfactory and Partially Satisfactory (two actions). An additional eight IFC action items remain open with ratings of Partially Satisfactory, Too Early to Tell, and Unsatisfactory.

A year after IFC's Board approved the Management Action Plan for this high profile and sensitive case, CAO finds evidence that IFC has taken steps to increase institutional awareness of the potential risks and impacts to children in the investments that it finances. CAO also finds evidence that IFC has taken steps to strengthen its institutional capacity to manage risks and impacts related to gender based violence and child sexual abuse, although more work is needed to further incorporate the latter into staff capacity building. CAO will follow the operationalization of such measures closely.

At the project level, CAO finds evidence that IFC conducted consultations that were survivor-centric, adhered to good international practice and, after significant adjustments throughout the process, included a wide range of local and international stakeholders including child protection experts. By extending the consultations and including a broader subset of stakeholders, IFC was able to obtain stakeholder feedback that will more adequately inform the design of the remediation program. CAO will now move its attention to the program's draft design, and to monitoring the remaining open action items.

Finally, in addition to the specific observations in Section 4, CAO identified two areas where IFC can improve the current implementation of its MAP actions:

- In the interest of transparency, CAO suggests that IFC make available a summary of the consultation feedback from participants before completing the design of the remediation program. This would enhance the credibility of the consultation process and the forthcoming remediation program design.
- CAO finds it important for IFC to continue providing opportunities for its staff, especially its recent hires with expertise in gender-based violence, to build their capacity on managing risks and impacts related to child safeguarding and protection, including child sexual abuse. Without this training it is unclear that IFC will have the institutional capacity to appropriately assess and manage risks and impacts pertaining to children in its investments.

Annex 1: CAO Monitoring Plan

CAO developed and is implementing a detailed monitoring plan that responds to the Board's request to closely monitor the actions set out in the MAP for this case. Summarized in the table below, the plan covered the first year of MAP implementation.

CAO's focus on key IFC activities was guided by indicators designed to measure their effective implementation. Based on the relevance of each IFC deliverable to the design of the remediation program, CAO's monitoring was divided into "ex-ante" and "ex-post" activities. During the preparation and execution of the "ex-ante" activities shown below, CAO engaged with IFC and provided actionable feedback in real time.

IFC Actions and CAO Monitoring Indicators for the MAP Design Phase

IFC Umbrella Action	IFC Deliverables	Select Key Indicators to Assess Effective Implementation	Monitoring Type
Remediation Program for survivors of child sexual abuse in counties where Bridge operated or currently operates in Kenya	Stakeholder consultations	Consultation process: a. Is survivor-centric and adheres to good international practice b. Captures inputs of Bridge survivors that wish to come forward c. Includes a wide range of stakeholders, including local and international organizations, and local and international child protection experts d. Is rated satisfactorily by participants.	Ex-ante
Portfolio review to identify child sexual abuse and GBV risks in investments and determine appropriate risk management measures	Portfolio Review Summary Report	<ul style="list-style-type: none"> Adequacy of actions in response to findings 	Ex-post
Review the E&S provisions included in template investment agreements	Updated investment agreement templates	E&S provisions are: <ul style="list-style-type: none"> CSA specific Designed to effectively minimize, report and document, and respond to CSA risks Enforceable. 	Ex-post
Update and make mandatory existing gender and GBV project risk screening; include child protection and safeguarding	Updated methodology that includes child protection and safeguarding elements	<ul style="list-style-type: none"> Updated project risk screening tool includes CSA considerations Mechanism in place to ensure mandatory application. 	Ex-post
Review and update E&S due diligence questionnaires and reporting templates	Updated questionnaires and annual monitoring template that includes child protection and safeguarding	<ul style="list-style-type: none"> E&S due diligence questionnaires and reporting templates consider CSA risks. 	Ex-post
Zero tolerance statement	Statement and evidence of operationalization	<ul style="list-style-type: none"> Zero tolerance statement issued and operationalized through elements such as: <ul style="list-style-type: none"> Procedures for IFC staff and consultants to engage clients when issues pertaining to GBV and CSA arise in projects Implementation of an anonymous and confidential hotline/email for IFC staff and consultants, as well as any member of the public, to report 	Ex-post

		<p>allegations of GBV/CSA related to an IFC investment</p> <ul style="list-style-type: none"> ○ Protocols for IFC Management to address issues pertaining to GBV/CSA ○ Measures to create a cultural shift so that staff and consultants feel empowered to raise issues when they arise (including sanctioning and reward mechanisms). 	
Institution-wide capacity building efforts to prevent child sexual abuse and GBV	Staff and STC hiring	Newly hired staff and consultants have significant experience in child protection	Ex-post
	Capacity building programs and consultancy roster	<ul style="list-style-type: none"> • Annual training and sensitization program for all staff (including consultants) has been designed and is ready to implement • Training content is aligned with international good practice • Regional external GBV specialist consultant competency-based program and roster designed and is ready to implement. 	Ex-post
	<p>Guidance Material:</p> <p>(i) Good Practice Note on Child Safeguarding</p> <p>(ii) GBV company diagnostic tool</p> <p>(iii) Guidance for IFC nominee directors</p>	New tools and guidance reflect international good practice on child protection and receive feedback from the Advisory Committee	Ex-post
Set up an Advisory Committee including relevant international and local GBV and child protection experts	Advisory Committee	Advisory Committee in place with wide range of recognized local and international expertise in GBV and child protection	Ex-ante

Annex 2: Summary of CAO Engagement with IFC on the Bridge-04 MAP²⁷

IFC's key activities during the first year of MAP implementation were stakeholder engagement activities aimed at gathering feedback to design the remediation program and institutional level actions to enhance IFC's capacity to manage risks and impacts related to GBV and children, including child sexual abuse. During most of the year, CAO and IFC met regularly to discuss implementation progress. Except for a handful of documents that IFC argued it could not share for confidentiality reasons, CAO received the documents it requested in a timely manner.

CAO-IFC Engagement on Stakeholder Engagement to Inform the Remediation Program

On May 3, 2024 IFC shared with CAO a copy of the draft Stakeholder Engagement Plan (SEP)—a short document that included the principles for stakeholder engagement and a framework for all future stakeholder engagement activities in the context of the MAP. CAO reviewed and provided feedback on the SEP, most of which was adopted by IFC before finalizing the document and sharing it with the Board on May 30, 2024. At that time, IFC also shared the terms of reference for the partners that would be hired to implement stakeholder engagement activities. CAO reviewed the terms of reference before the partners were selected but had no influence on who was chosen. The two selected partners were the United Nations Population Fund (UNFPA) and the United Nations Children's Fund (UNICEF).

On July 9 and July 16, 2024, CAO requested that IFC share the schedule for the consultations to gather stakeholder feedback to inform the remediation program for survivors of child sexual abuse. IFC did not share the schedule until August 6, one week after consultations began. On several occasions between July and August of 2024, CAO asked to attend at least one of the meetings held in Kenya as an observer. All these requests were denied by IFC, which conveyed that UNFPA would not allow CAO to attend any of the meetings (including those where survivors would not be present) because it went against best practices on GBV/CSA to include external observers. CAO did not press further despite IFC and UNFPA's view not being shared by independent GBV/CSA experts consulted by CAO.

CAO's lack of participation in the consultation meetings held from August 2 to September 16 2024 prevented CAO from having firsthand knowledge that it could use to assess the effectiveness of the consultations held during that period. CAO did, however, gain prompt access to several drafts of the stakeholder engagement reports that were completed once the initial consultation period ended in mid-September.²⁸ These reports include secondhand information of how the consultations in Kenya were conducted, and a summary of the feedback obtained from consultation meetings. CAO acknowledges IFC's prompt sharing of these reports.

²⁷ Between March and July 2024, CAO and IFC met intermittently to discuss issues related to the implementation of the MAP. In August 2024, CAO and IFC began biweekly meetings with the objective of improving information flow among the teams. CAO is grateful for the IFC's continued engagement and for the predominantly timely sharing of information.

²⁸ IFC shared a draft of the first consultation report with CAO on October 11, 2024.

CAO also requested to meet with UNFPA and UNICEF in order to (a) obtain more detailed information on the methodology and protocols used during consultation meetings, and (b). to inquire if all steps included in the SEP to enable participation by Bridge survivors who wished to be consulted had been followed. A meeting with IFC, UNFPA, and UNICEF took place on October 22, 2024, and was followed by multiple emails requesting further information about the steps in the SEP. IFC and its implementing partners were not able to answer CAO's questions with a level of detail that allowed CAO to confirm that Bridge survivors were given an adequate opportunity to participate in the consultation process. As a result, on November 15, 2024, CAO asked IFC extend the stakeholder engagement process to allow more time to collect feedback from survivors before beginning design of the remediation program.

In March 2025, IFC released the [second management progress report](#) on MAP implementation, disclosing its decision to broaden the scope of stakeholders consulted. The subsequent second round of consultations included education stakeholders (e.g., county education boards, PTAs, school education committees), young adults (aged 18-24), and adult survivors of child sexual abuse.

This second phase was conducted from March 23 to April 4, 2025, and CAO was able to observe the validation workshop, which was the final meeting of the extended consultation process. CAO observes that the consultations appear to have been conducted adequately and were effective at gathering feedback from survivors and education stakeholders in the school setting context. CAO notes that participants in the second round of consultations were given more information regarding the context in which these consultations were taking place, by referring to the CAO Bridge-04 investigation in the validation workshop. CAO's preliminary assessment of the second phase is based exclusively on its participation in the validation workshop and preliminary engagement with implementing partners UNFPA and UNICEF.

Engagement on Institutional Level Actions Intended to Enhance IFC's Capacity to Manage Risks and Impacts Related to GBV and Children

During the first year of MAP implementation IFC promptly shared all the information that CAO requested related to the institutional level actions to enhance its capacity to manage risks and impacts related to GBV and children. CAO is grateful to IFC for its continued active engagement and information sharing around these issues.