



The Independent Accountability Mechanism for IFC & MIGA

Second Compliance Monitoring Report:

IFC's Implementation of the Management Action Plan for Bridge International Academies-04 / Learn Capital 01-04, Kenya

July 28, 2026

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:

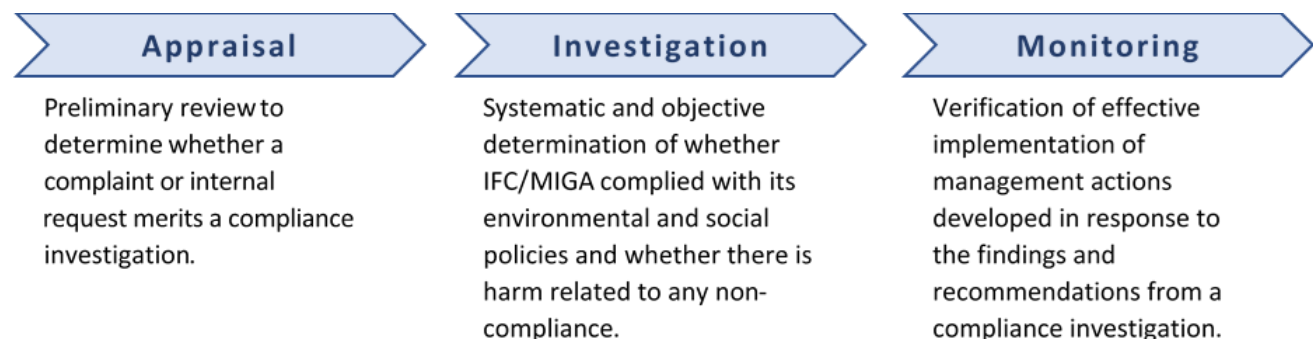


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Acronyms

AC	Advisory Committee
CAO	Office of the Compliance Advisor Ombudsman (IFC and MIGA)
CSA	Child Sexual Abuse
CSEA	Child Sexual Exploitation and Abuse
CSO	Civil Society Organization
DG	Director General
E&S	Environmental and Social
ECPR	Emergency Child Protection Response
EBC	Ethics and Business Conduct
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
GPN	Good Practice Note
IFC	International Finance Corporation
MAP	Management Action Plan
MIGA	Multilateral Investment Guarantee Agency
MPR	Management Progress Report
MR	Management Report
PS	IFC Performance Standards
SEAH	Sexual Exploitation, Abuse, and Harassment
SEP	Stakeholder Engagement Plan
UNFPA	United Nations Population Fund
UNICEF	United Nations Children's Fund

Terminology Note: In this report, “CSA” refers to child sexual abuse. “CSEA” refers to child sexual exploitation and abuse. “SEAH” refers to sexual exploitation, abuse, and harassment. “Child safeguarding” refers to measures to prevent and respond to harm to children associated with project activities and actors, while “child protection” refers more broadly to systems and actions to protect children from violence, exploitation, and abuse.

Executive Summary

About This Report

Compliance monitoring of Management Action Plan (MAP) actions taken by IFC is the final phase in CAO's compliance process. This stage is critical to verify whether IFC effectively implements its remedial commitments in response to CAO's investigation findings and achieves meaningful outcomes.

This monitoring report presents CAO's second assessment of IFC's implementation of the MAP developed in response to the Bridge International Academies-04 compliance investigation in Kenya. The IFC Board approved the MAP in March 2024 following CAO's findings of non-compliance related to child sexual abuse (CSA)¹ risks and incidents in Bridge schools. The MAP includes both project-level and institutional-level actions. Key commitments include a Remediation Program for survivors of CSA and GBV complemented by prevention activities, a review of child protection and GBV risks across IFC's project portfolio, strengthened risk management tools and training, and the set-up of an Advisory Committee to guide implementation.

This second case monitoring report covers IFC's activities between July 2025 and June 2026—approximately the second year of MAP implementation—and evaluates both open actions from the previous monitoring cycle and newly-implemented activities.

Methodology: CAO activities during this 12-month monitoring period included regular meetings with IFC, engagement with complainants' representatives, and review of IFC documentation. This report also introduces CAO's revised monitoring methodology, which separately rates the implementation of actions and their effectiveness, providing a clearer assessment of both IFC outputs and outcomes (see section 1.4.).

CAO Observations

Open IFC Actions

Portfolio review: IFC completed its global portfolio-wide review of active investments, identifying higher-risk projects and developing corrective action plans for gaps in GBV and child protection risk management. IFC's review was comprehensive and based on best practice, including site supervision visits and sector-specific corrective action plans. However, IFC did not provide sufficient project-level information for CAO to assess whether the resulting action plans adequately address the identified risks on a case-by-case basis. Accordingly, CAO rates this action "**Implemented**" but "**Not Yet Evaluable**," and it remains **open**.

¹ **Terminology note:** In this report, "CSA" refers to child sexual abuse. "CSEA" refers to child sexual exploitation and abuse. "SEAH" refers to sexual exploitation, abuse, and harassment. "Child safeguarding" refers to measures to prevent and respond to harm to children associated with project activities and actors, while "child protection" refers more broadly to systems and actions to protect children from violence, exploitation, and abuse.

Zero-tolerance statement: IFC has successfully operationalized its zero-tolerance commitment through updated procedures, reporting templates, and staff guidance for handling GBV and CSA incidents. However, CAO is unable to assess the effectiveness of these procedural changes as IFC has not made implementation data available. IFC also declined to establish a dedicated anonymous reporting mechanism for staff and other actors to address GBV and CSA concerns related to projects it finances. CAO considers continued reliance on the World Bank Group’s existing Ethics and Internal Justice Services (EIJ) channels insufficient as they do not directly address project-level incidents or serve non-IFC personnel. Consequently, CAO keeps **open** the MAP actions for internal procedures and reporting tools as “**Implemented**” but “**Not yet Evaluable**,” while **closing** the anonymous reporting component with a rating of “**Implemented**” but “**Not Effective**.”

Institutional capacity building: IFC completed multiple staff trainings, consultant workshops, a Good Practice Note on Child Safeguarding, a GBV Company Diagnostic Tool, and updated training materials for IFC Nominee Directors. These guidance materials effectively incorporate child safeguarding considerations and align with good international practice. However, training materials for staff continue to use key concepts—such as child safeguarding, child protection, GBV, and SEAH—inconsistently, which may limit staff understanding and application. Therefore, CAO keeps these training-related actions **open as** “**Implemented**” and “**Partially Effective**,” while **closing** the Good Practice Note, Diagnostic Tool, and Nominee Director Training actions as “**Implemented**” and “**Effective**.”

Advisory Committee: IFC has put in place a functioning Advisory Committee with appropriate local and international expertise, and members who possess strong child safeguarding and GBV expertise. CAO also reviewed how IFC considered the Committee’s advice in designing the Remediation Program and CSA prevention activities. In general, IFC incorporated the Committee’s recommendations on good practice, geographic scope, survivor satisfaction, and sustainability, but was only partially responsive to the experts’ advice on the scope of survivor services. Overall, CAO rates the Committee’s composition and role as “**Implemented**” and “**Effective**,” with one thematic area (access to services) assessed as “**Partially Effective**.” The action remains **open** because the Committee’s role and composition may evolve and CAO will assess its advice to IFC during implementation of the Remediation Program’s response and prevention activities.

New IFC Actions

Remediation Program: IFC developed a preliminary design for a three-year Remediation Program and selected UNFPA and UNICEF as implementing partners. This preliminary design is grounded in recognized international standards and establishes a generally appropriate framework. Key operational elements—including service protocols, provider selection, grievance mechanisms, outreach strategies, KPIs, and transition arrangements for

complainants—remain under development. As a result, CAO considers the design **“Partially Implemented,”** and its effectiveness **“Not yet Evaluable.”**

Implementing partner selection: IFC’s applied transparent selection criteria that fit the local context in choosing UNFPA and UNICEF. However, while disclosure of the criteria was transparent, IFC did not open the process to competitive proposals, instead pre-selecting the candidates for consideration. CAO **closes** this action and determines it was **“Implemented”** but **“Partially Effective.”**

Direct support to the four Bridge survivors: Since March 2025, IFC has begun providing interim support to the four CAO complainants who suffered child sexual abuse through a local service provider. Although this demonstrates progress toward the MAP commitments, survivors report significant challenges, including inadequate case management and insufficient guidance on accessing economic empowerment support. CAO concludes that the services provided have not met the standards for good survivor-centered practice. This action therefore remains **open** and is rated **“Partially Implemented”** and **“Not Effective.”**

Conclusion

This monitoring period marks a pivotal transition from planning to execution in IFC’s MAP implementation. CAO observes measurable progress, with several commitments implemented and assessed as effective, yet notable gaps remain. IFC’s commitment to provide interim direct support to the four Bridge complainants is a positive step. However, the execution raises concerns about timeliness, proactivity, and service quality, causing frustration for the survivors and highlighting operational risks that IFC should address promptly. Establishing the Remediation Program’s results framework, KPIs, targets, and exit milestones will be central to its governance and effectiveness, and CAO recommends sharing these elements with the IFC Board and CAO before finalization.

1. CAO Case History and Timeline

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.² IFC leadership has acknowledged that this case underscores the importance of safeguarding vulnerable populations, particularly children, when supervising investments and working with clients to address instances of child sexual abuse and gender-based violence in projects.³ IFC's ongoing responses include both project-level and institutional actions.

CAO's Director General initiated the Bridge-04 compliance process in September 2020. As a Director General–initiated case, Bridge-04 was not triggered by a complaint at the time it was opened. CAO subsequently received four complaints from former students at a Bridge school in Kenya alleging that they were sexually abused and harassed by a teacher. In August 2024, CAO merged these complaints (Learn Capital complaints 01-04, described further below) with the Bridge-04 compliance monitoring process, because they raised substantively similar issues which were addressed in the investigation.

This section summarizes the history of the case, including IFC's original investment, CAO's compliance investigation and recommendations, IFC's resulting MAP actions, and CAO's monitoring activities to date. The following section presents CAO's detailed observations on IFC's implementation of its existing and new MAP actions.

² The case is officially archived as Bridge International Academies-04 / Learn Capital 01-04, Kenya.

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

Bridge-04 Timeline of Key Events

● CAO Process

● IFC Actions

2013



2013-2016

IFC Board approves US\$13.5m Bridge projects (#32171, #38733, #39170, and #39224)

2018



2018

CAO receives Bridge-01 complaint

2020



February 2020

CAO Bridge-01 field mission learns of alleged CSA incidents involving staff at Bridge schools



June 2020

CAO launches Bridge-04 compliance appraisal focused on CSA at Bridge schools

2021



January 2021

CAO launches Bridge-04 investigation

2022



March 2022

IFC exits its investment in Bridge parent company NewGlobe Schools, remains indirectly exposed until February 2024 through its investment in Learn Capital III

2023



June-August 2023

Four former Bridge students file complaints with CAO (Learn Capital 01-04)



October 2023

CAO publishes Bridge 04 compliance investigation report

2024



March 2024

IFC Board approves IFCs Bridge-04 remedial Management Action Plan



August 2024

CAO merges the Learn Capital 01-04 cases with its Bridge-04 compliance monitoring of IFC's MAP



October 2024

IFC publishes its first Management Progress Report (MPR).

2025



March and July 2025

IFC publishes its second and third MPR



July 2025

CAO publishes its first monitoring report

2026



March 2026

IFC publishes its fourth MPR

1.1. 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).⁴ The purpose of IFC's investment was to support the expansion of Bridge's network of kindergarten through grade 12 schools⁵ serving low-income communities in Kenya, as well as Bridge's expansion into three new countries.⁶ At the time of IFC's first investment, Bridge operated 211 elementary and secondary schools in Kenya, serving approximately 57,000 students.⁷ IFC exited its investment in NewGlobe Schools Inc. on March 3, 2022, but retained indirect exposure until February 2024 through its investment in Learn Capital Venture Partners III LP (Learn Capital III) which held equity in NewGlobe Schools.

1.2. CAO Bridge-04 Investigation, Findings, and Recommendations

In September 2020, CAO's Director General initiated a compliance appraisal to consider allegations of child sexual abuse in Bridge schools. CAO learned of these incidents during a compliance investigation mission to Kenya in February 2020 regarding a separate complaint against the school operator (Bridge-01).⁸ After concluding a compliance investigation was warranted, CAO conducted an investigation focused on IFC's oversight of risks and impacts related to child safeguarding and protection⁹ with particular attention to alleged incidents of child sexual abuse in Bridge's Kenyan academies.¹⁰ The [Bridge-04 Compliance Investigation Report](#), published in October 2023, found IFC in non-compliance with its Sustainability Policy in relation to project adherence to Performance Standards 1 (Assessment and Management of Environmental and Social Risks and Impacts) and 4 (Community Health, Safety, and Security). The report cited IFC's failures to address CSA risks during due diligence and supervision and CAO's findings of harm included 23 incidents of child sexual abuse 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

⁴ IFC, 2013, SII. Available here: <https://officecao.org/3zVfqZL>.

⁵ IEG, June 2022, An Evaluation of International Finance Corporation Investments in K-12 Private Schools.

⁶ IFC, October 30, 2013, SII. Available here: <https://officecao.org/3zVfqZL>. IFC's support of Bridge was executed through Bridge's Delaware parent company NewGlobe Schools, which established Bridge in 2011 as a wholly-owned Kenyan subsidiary.

⁷ IFC, October 2013, SII Project Description. Available here: <https://officecao.org/3zVfqZL>.

⁸ 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). This complaint was transferred to CAO's compliance function for appraisal and CAO initiated a compliance investigation in October 2019. In February 2020, 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.

⁹ **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.

¹⁰ CAO, October 21, 2021, Bridge-04 Compliance Investigation Terms of Reference. Available here: <https://officecao.org/4j7Jjyc>.

measures to assess and manage risks and impacts related to child safeguarding and protection.

CAO Investigation Recommendations to IFC

CAO's 2023 investigation report made 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. These included:

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 remedies, 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 risks and incidents against children within project communities.
3. Review its portfolio to identify all projects where children are a vulnerable and disadvantaged subset of affected communities and 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 IFC's 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, four former Bridge students filed complaints with CAO stating that they were sexually abused and harassed by a teacher while enrolled at a Bridge school in Kenya (the Learn Capital 01-04 cases). CAO considered these incidents during the Bridge-04 Investigation. By that time, IFC had exited its direct investment in Bridge but retained indirect exposure through its investment in the education-focused equity fund Learn Capital III which held equity in NewGlobe Schools, Bridge's parent company. 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. Additional information on the decision to merge the complaints is available in the [Learn Capital Compliance Appraisal](#).

1.3. IFC Management Report and Management Action Plan

In March 2024, the IFC Board approved IFC's Management Report (MR) and Management Action Plan (MAP) in response to CAO's Bridge-04 compliance investigation.¹¹

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 and 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.¹² IFC confirmed that it largely agreed with CAO's findings and recommendations.

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

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.** IFC aimed to complete the program's design within the first six months, with program implementation 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 and 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.

¹¹ IFC Management Report and Management Action Plan in relation to the CAO Compliance Investigation Report on Bridge 04, March 7, 2024. Available at: <https://officecao.org/3zO6P2r>.

¹² Ibid, p.10.

- **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.

Annex 3 provides a more detailed summary of the Bridge-04 MAP, including actions, deliverables, and timelines.

1.4. CAO Monitoring Activities

Following the Bridge-04 MAP's approval, the IFC Board directed CAO to monitor its implementation closely. In response, CAO has developed and implemented two monitoring plans since March 2024, both shared with IFC.

The first monitoring plan covered IFC's activities related to the design process for the Remediation Program and strengthening of institutional capacity to assess and manage risks and impacts related to child safeguarding and protection, and GBV. The second focuses on activities linked to the Program's final design and operationalization as well as child protection and safeguarding prevention activities, among others. Both plans include indicators for CAO to measure effective implementation of key MAP activities and are currently in use as part of ongoing monitoring of this case. They are summarized in Annex 2.

Since IFC began MAP implementation, CAO has undertaken a range of monitoring activities. These include a mission to Kenya in April 2024, biweekly meetings with IFC since August 2024, and ongoing dialogue with the complainants and their representatives to gather feedback on MAP implementation. After publishing its first Monitoring Report in July 2025, CAO has focused on the eight MAP actions that remain open¹³ from the previous monitoring period, as well as IFC's newly-implemented MAP actions.

This second monitoring report assesses activities IFC reported between July 2025 and June 2026, approximately covering the second year of IFC's efforts to implement the [Management Action Plan \(MAP\) for Bridge International Academies-04 / Learn Capital 01-04](#).

The following section presents CAO's observations on the effective implementation of IFC's MAP actions, as stipulated in paragraphs 139-146 of the [CAO Policy](#). For each action, CAO's assessment includes separate implementation and effectiveness ratings in line with the new monitoring methodology described below. This represents an enhancement from CAO's previous monitoring report for this case.

¹³ The list of activities that were closed at the time CAO's First Monitoring Report was published can be found in Annex 1. Additional details are included in CAO's first [Monitoring Report](#), available on CAO's website.

Adjustment of CAO's Monitoring Rating Methodology

CAO has introduced an updated monitoring methodology that provides a dual rating, one for implementation and the other for effectiveness, consistent with the CAO Policy.¹⁴ Previously, CAO monitoring reports applied a five-point scale that combined assessments of the completion of IFC/MIGA actions and their outcomes.¹⁵ CAO now rates each MAP action on two dimensions:

- **Implementation (output):** Whether the action was delivered as specified in the MAP (scope, quality, and timing).
- **Effectiveness (outcome):** Whether the implemented action achieved its intended results, including addressing the non-compliance finding, correcting or mitigating harm, reducing recurrence risk, and strengthening institutional performance.

This approach provides a clearer record of both delivery and results. It recognizes that while implementation may be largely within IFC/MIGA control, effectiveness may also be influenced by external factors (such as client capacity, operating context, and broader socio-political conditions). Separating the ratings enables stakeholders to assess effort and impact without conflating the two.

CAO Implementation and Effectiveness Ratings

Implementation (Output)	Effectiveness (Outcome)
Implemented	Effective
Partially Implemented	Partially Effective
Not Implemented	Not Effective
Not Yet Implemented	Not Yet Evaluable
	Not Evaluable

¹⁴ The CAO Policy, paragraph 140, requires CAO to verify the effective implementation of IFC/MIGA actions. The recently completed CAO Omnibus Monitoring report also includes this revised dual rating system.

¹⁵ While intended to provide a holistic view, CAO's previous rating approach could obscure important distinctions. For example, in some cases, IFC/MIGA delivered MAP actions as committed (meeting scope, quality, and timing requirements), but those actions did not fully address the relevant non-compliance findings or related Harm.

2. CAO Observations of IFC MAP Implementation

This section presents CAO's detailed assessment of IFC's implementation of the eight MAP actions that remain open from the last monitoring period, as well as the newly-implemented MAP actions not assessed in CAO's first Monitoring Report. Detailed information on all implemented MAP actions is available in IFC's Management Progress Reports from October 2024, March 2025, July 2025, and March 2026, published on the CAO website.¹⁶

Throughout this section, CAO also suggests next steps for several current IFC action items. Overall, CAO concludes that IFC has advanced implementation across its institutional-strengthening commitments, including completing the portfolio review, issuing and operationalizing zero-tolerance statements through updated procedures and client reporting tools, progressing capacity-building through staff training and consultant workshops, and maintaining an Advisory Committee (AC) to support the remediation architecture. However, CAO is not yet able to assess the effectiveness of several actions due to insufficient project-level information, limited implementation data, or ongoing transitions—including for the AC's role and the portfolio review effectiveness. In other instances, CAO has rated actions partially effective on the basis that IFC has made improvements, but further refinements are required to align fully with good international practice. This is particularly the case regarding clarity and consistency of terminology in training materials.

2.1. Open MAP Actions from First CAO Monitoring Report

CAO's assessment covers IFC's measures during July 2025-June 2026 related to portfolio review of CSA/GBV risks, GBV-related statements, staff training and tools, and progress on an Advisory Committee to inform MAP-related activity.

2.1.1. MAP Action for Institutional Strengthening: Portfolio Review

MAP 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

Key CAO Monitoring Plan Indicators

Action Item and Key Indicator	Implementation	Effectiveness	CAO Monitoring Status/Rationale
Portfolio Review Summary Report <i>CAO effectiveness indicator:</i> <i>Adequacy of actions in response to findings.</i>	Implemented	Not Yet Evaluable	Open: IFC completed the Portfolio Review but has not shared the information necessary to assess the effectiveness of its actions.

¹⁶ IFC, Bridge-04 Management Progress Reports, available here: <https://bit.ly/3TNoMYB>.

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.

According to IFC's Fourth Management Progress Report (MPR) from March 2026, IFC has completed the portfolio review, sharing a summary with CAO in July 2025.¹⁷ In reviewing its approximately 2,000 active investments, IFC identified a subset of projects across several higher-risk sectors for closer assessment, including site visits. Of these, some investments required corrective action plans, including investments in the K–12 private school sector.

CAO Assessment

CAO welcomes IFC's Portfolio Review and the steps IFC reports taking to address CSA and/or GBV risks in investments requiring corrective action plans. IFC's comprehensive approach to identifying high-risk projects included desk-based reviews and site supervision visits to investments assessed as highest risk. CAO considers IFC's response to identified risk management deficiencies to be generally consistent with GBV and child protection best practices.

However, the portfolio review summary shared with CAO does not identify the specific projects where gaps were found or provide examples of action plans for individual projects or updates on their implementation. This lack of project-level information prevents CAO from assessing whether the actions identified for each project are adequate to address the specific gaps in GBV and child protection risk management that IFC identified. Therefore, CAO is unable to assess whether IFC actions in response to gaps in GBV and child protection risks identified by the Portfolio Review have led to improved CSA/GBV risk management measures and outcomes in the relevant investments. CAO will keep this action open to allow IFC an opportunity to provide additional information that permits CAO to assess the effectiveness of IFC's project-level corrective action plans.

Monitoring Status and Effectiveness Rating: This MAP action remains open for monitoring. The action has been implemented but its effectiveness is not yet evaluable .

¹⁷ IFC Management Progress Report on the Implementation of the Management Action Plan for Bridge-04, March 6, 2026 (hereinafter "Fourth MPR"), p.4, para. 17. Available at: <https://officecao.org/4IUOvIC>.

2.1.2. MAP Action for Institutional Strengthening: Zero Tolerance Statements

MAP Action Item C.5.a. Issuance of Zero Tolerance Statements for Inaction on or Reprisals for Addressing GBV in Child Protection Issues

Key CAO Monitoring Plan Indicators

Action Item and Key Indicator	Implementation	Effectiveness	CAO Monitoring Status/Rationale
Statement and Evidence of Statement Operationalization CAO effectiveness indicators: Procedures for IFC staff and consultants to engage clients when issues pertaining to GBV and CSA arise in projects.	Implemented	Not Yet Evaluable	Open: IFC has enhanced its internal procedures and client reporting tools for CSA/GBV incidents, but it is too early to determine if either has been effective, as there is no existing data from which to measure the effects of those enhancements. CAO will wait for IFC to have implementation data to share before it provides an assessment of the enhanced internal procedures and client reporting tools.
Implementation of an anonymous and confidential reporting channel (e.g. a hotline or email) for IFC staff and consultants, as well as any member of the public, to report allegations of GBV/CSA related to an IFC investment.	Implemented	Not Effective	Closed: Regarding anonymous reporting, IFC has updated its internal procedures for staff reporting adverse E&S events, including GBV and CSA, which now require notifying clients and/or IFC management. CAO notes that staff may not always feel comfortable reporting such incidents to the client or IFC management and, despite closing the action, again suggests that IFC include means to confidentially and anonymously report and escalate significant incidents in investments. This would necessitate a mechanism outside the EIJ.

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."¹⁸ On March 14, 2024, IFC Managing Director Diop sent a follow-up email that expanded on President Banga's communication, stating 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:

¹⁸ CAO, First Monitoring Report Bridge-04/Learn Capital 01-04, July 2025, p. 18, <https://officecao.org/4wy57tX>.

- Embedding child protection and GBV measures into IFC's Environmental and Social (E&S) policies and procedures during the forthcoming review and update of IFC's Sustainability Framework.
- Providing mandatory training to all operations staff on non-financial risks, with an emphasis on GBV and child protection.¹⁹

IFC has operationalized these leadership statements through the following actions:

Updates to Staff Procedures: In January 2025, IFC updated its Environmental and Social Review Procedures (ESRP) to include, for the first time, guidance for responding to significant adverse E&S events in projects.²⁰ CAO reviewed the updated ESRP as part of its first Monitoring Report and found that it formalized institutional steps for staff reporting and escalating such events.²¹

CAO also noted that the latest ESRP did not include an anonymous reporting channel for individuals associated with an IFC investment (e.g., staff, contractors, client firms) to report serious incidents without fear of retaliation.²² In its first Monitoring Report, CAO suggested that IFC adopt confidential and anonymous reporting mechanisms for CSA and GBV.²³

In November 2025, IFC reiterated its position to CAO that a separate anonymous reporting channel for staff was not necessary, maintaining that project-level CSA and GBV incidents should be reported through the World Bank Group's Office of Ethics and Business Conduct (EBC), now called the Ethics and Internal Justice Services Vice Presidency (EIJ).

Client SEAH and GBV Reporting Tools: In November 2025, IFC informed CAO that it had developed two reporting templates for clients to capture SEAH information: (1) an "Initial Reporting Template," for use when a SEAH incident is first identified; and (2) a "Company Investigation Reporting Template," to be submitted by the client within 60 days of becoming aware of an incident. IFC reports that both templates have been available for client use since May 2025.²⁴ However, IFC has not yet provided CAO with consolidated information on their uptake or application (for example, the number of incidents reported using the templates, timeliness of reporting, or follow-up actions taken).

¹⁹ Ibid.

²⁰ IFC, ESRP, May 2025, paras. 7.1-7.5, <https://bit.ly/3QXgLi0>

²¹ The ESRP defines an IFC project-related *Significant Adverse E&S Event* as having material impact on project workers, project-affected communities or the environment. Examples of adverse events include fatalities, serious accidents, and injuries; social impacts from labor influx; sexual assault, sexual exploitation, sexual abuse or other forms of gender-based violence; 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's whistleblower procedures for persons who work for a public or private organization. EU Directive 2019/1937 promotes reporting any breach to EU law anonymously, <https://officecao.org/3HQwUSc>.

²⁴ In March 2026, IFC reported in its Management Progress Report that "IFC is strengthening staff and client capacity on survivor-centered GBV investigation processes and is working on fine tuning the existing incident reporting protocol for managing such incidents." See, IFC, fourth MPR, March 2026, p.5, <https://officecao.org/4f4Vs6Y>.

Other measures: IFC informed CAO that it considered child safeguarding and protection provisions in its legal agreements²⁵, and child protection and safeguarding risk assessment tools and training, to be part of its operationalization of zero-tolerance position.²⁶

CAO Assessment

CAO notes that IFC has issued clear institutional statements of zero tolerance for inaction on, or reprisals for, addressing GBV and child protection and safeguarding issues. The statements are supported by recent internal procedural updates and client reporting tools.

On anonymous reporting of child sexual abuse and other GBV incidents, IFC has informed CAO that it will not implement an anonymous and confidential reporting channel (e.g., a hotline or email) for individuals associated with an IFC investment (e.g., staff, contractors, firms) to report allegations of GBV/CSA related to an IFC investment. Instead, IFC will rely on the World Bank's Group's Ethics and Internal Justice Services Vice Presidency's existing reporting channels²⁷ as the main conduit through which IFC staff and consultants can anonymously report cases of child sexual abuse, as well other GBV related incidents.

CAO notes that the EIJ website includes an anonymous reporting channel for IFC staff and consultants to report sexual harassment, exploitation, and abuse against them or by IFC staff and consultants.²⁸ CAO spoke to EIJ who conveyed that, in addition to the anonymous reporting channels for IFC staff and consultants, EIJ is responsible for addressing any allegations of retaliation brought by staff and consultants, a process governed under the WBG Staff Directive pertaining to Protection Against Retaliation.²⁹ However, CAO notes that EIJ does not investigate claims pertaining to CSA or GBV occurring in IFC investments or allegations of retaliation made by non-IFC staff or consultants.

In its current form, the ESRP continues to require IFC staff and consultants to notify the client and IFC management of significant adverse incidents³⁰ when they are made aware of such events. CAO notes again that staff may not always feel comfortable reporting CSA or GBV allegations in projects to the client or IFC management,³¹ and repeats its suggestion in the first monitoring report that IFC include means to confidentially and anonymously report and

²⁵ As reported before, IFC "updated legal covenants in its investment agreement templates with SEAH and child protection incident reporting obligations and, anti-sexual harassment policy obligations for new investments." IFC, Third MPR, July 2025, p. 4, <https://officecao.org/4p8XgAr>.

²⁶ Previous IFC MPRs available here: <https://officecao.org/4vPiJFb>.

²⁷ EIJ's existing reporting channels can be found here: <https://officecao.org/4yad7D6>. The existing channels comprise a third-party helpline and a reporting form managed by EIJ.

²⁸ The EIJ website can be accessed here: <https://officecao.org/4vhCEYm>.

²⁹ Staff Directive 3.08 regarding Protection Against Retaliation can be accessed here: <https://officecao.org/4p3KN0U>. In cases where staff believe that they are retaliated against because of their use of the above-mentioned EIJ procedures, they may report allegations of retaliation to EIJ.

³⁰ 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. See, details in footnote 21.

³¹ This was the case for some individuals that worked on the Bridge International Academies investment.

escalate significant incidents in investments. This would necessitate a mechanism outside of EIJ.³²

Regarding client reporting tools, CAO found these to be generally appropriate and aligned with good practice on addressing CSA and GBV incidents, including the presence of steps to maintain survivor confidentiality and the use of a child sensitive approach where children are involved. However, CAO suggests that IFC revise the “Initial Reporting Template” to ensure the form is gender blind and captures disability status and other potential survivor needs, particularly those of children. Capturing this information will support the process of referring survivors to the appropriate service providers. With respect to the “Company Investigation Reporting Template,” CAO suggests including more detailed guidance on how incidents should be investigated, including who should be responsible for leading and overseeing investigations, the minimum qualifications and competencies required of those conducting the investigations, and the criteria for engaging law enforcement.

CAO notes that it is too early to determine whether the internal procedural updates and client reporting tools have been effective, more time is needed to compile sufficient data to measure the effects of these enhancements. CAO will therefore wait for IFC to have implementation data to share on the following before it provides a full assessment of these activities:

- (1) IFC’s management of significant E&S events, including how many of the reported events pertain to GBV and CSA, the timeliness with which they were reported, and the steps taken to investigate and address such incidents.
- (2) The adoption and usage of the “Initial Reporting Template” and “Company Investigation Reporting Template” by clients. CAO will also assess the timeliness with which clients report incidents and the steps taken to investigate and address them.

Monitoring Status and Effectiveness Rating: The MAP action related to internal procedures and client reporting tools is [open](#). The action has been **implemented** and is considered **not yet evaluable**. The MAP action regarding anonymous reporting is [closed](#). The action has been **implemented** and is considered **not effective**.

³² See, for example, the EU whistleblower procedures for persons who work for a public or private organization. EU Directive 2019/1937 promotes reporting any breach to EU law anonymously, <https://officecao.org/3HQwUSc>.

2.1.3. MAP Action for Institutional Strengthening: Boosting IFC Staff and Clients Capacity

MAP Action Items 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

Key CAO Monitoring Plan Indicators

Action Item and Key Indicator	Implementation	Effectiveness	CAO Monitoring Status/Rationale
Annual Training Plan and Regional External GBV Consultant's Workshops CAO effectiveness indicator: - 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.	Implemented	Partially Effective	Open: CAO will keep both actions open to allow IFC to further strengthen training materials to align content to good international practice.
Guidance Materials: Good Practice Note on Child Safeguarding GBV company diagnostic tool Guidance for IFC nominee directors CAO effectiveness indicator: New tools and guidance reflect good international practice on child protection and have feedback from the Advisory Committee.	Implemented	Effective	Closed: All action items have been implemented effectively, in line with MAP objectives.

IFC's March 2026 Management Progress Report included updates on several MAP action items to boost institutional capacity:

- Completion of multiple staff trainings on child safeguarding (D.2.a) in April, October, and November 2024, and in 2025 and 2026 (specific months not reported)
- Completion of two GBV awareness-raising webinars for financial intermediary (FI) clients in March 2024, two regional training sessions for FI staff in July and October 2025, and completion of FI client training in February 2026
- Completion of the first regional training course for external GBV consultants (D.2.b)
- Publication of a Good Practice Note on Child Safeguarding in Business (D.3.a) in December 2025 with dissemination webinars held in January 2026.

CAO Assessment

CAO observes that IFC has continued activities to implement these MAP actions. In its first Monitoring Report, CAO recommended revisions to the materials for the annual staff training (D.2.a) and the external GBV consultants' workshops (D.2.b). IFC has since updated the materials which CAO has reviewed. While improvements are evident, CAO observes that further refinements are needed to better reflect good international practice.

The training materials covering GBV risks exclusively, or child safeguarding exclusively, are well-aligned with best practices. However, when presentations address both child safeguarding and GBV, key terms such as child protection, child safeguarding, GBV, and SEAH are used interchangeably, which undermines the purpose of the training. These materials are intended to introduce staff to new areas of risk assessment, help them distinguish when these types of risks or incidents are present in projects, and identify adequate measures to mitigate risks and respond to incidents. Without clear definitions and consistent use of terminology, staff will not be equipped to adopt measures appropriate to each situation which, in line with good international practice, differ depending on whether the risk or incident in question relates to GBV or child sexual abuse (CSA).

CAO therefore recommends that IFC add clear definitions and ensures consistent use of key terms, including child protection, child safeguarding, GBV, GBVH, and SEAH. To this end, CAO recommends drawing more systematically on IFC's Good Practice Note on Child Safeguarding as a foundation for the training content, including its accessible introductions and definitions of core concepts.

CAO will keep actions D.2.a and D.2.b open to allow IFC to strengthen these materials further as suggested above to provide staff with adequate guidance to address the different types of GBV and child protection risks projects may encounter. Both actions remain open, with ratings of "implemented" and "partially effective."

CAO also reviewed the final version of the Good Practice Note (GPN) on Child Safeguarding in Business (D.3.a), which is comprehensive and practical, incorporating relevant international standards and guidance to help keep children safe. The Note clearly distinguishes child safeguarding from child protection and provides staff with actionable guidance for managing GBV and CSA risks in projects. CAO recommends that IFC use the GPN as a foundation for related tools and training materials. CAO understands that IFC consulted the Advisory Committee in developing the GPN and incorporated its feedback. CAO will close this action with a rating of "implemented" and "effective."

Lastly, CAO reviewed the most recent internal version of the GBV Company Diagnostic Tool (D.3.b) and the updated training materials for IFC Nominee Directors on GBV risk governance (D.3.c). In its first Monitoring Report, CAO noted that both the tool and training focused exclusively on GBV, and did not address good international practice on child protection and

safeguarding, and recommended revisions. In November 2025, IFC shared updated versions incorporating child protection and safeguarding components,³³ consistent with CAO's guidance. CAO finds the integration of child safeguarding considerations in the tool and training satisfactory, although the distinction between child safeguarding and child protection could be further clarified. CAO will close actions D.3.b and D.3.c with ratings of "implemented" and "effective."

Monitoring Status and Effectiveness Rating:

MAP action items D.2.a and D.2.b remain [open](#). Both are considered **implemented** and **partially effective**.

MAP action items D.3.a; D.3.b; and D.3.c are [closed](#). All are considered **implemented** and **effective**.

2.1.4. MAP Action for Institutional Strengthening: Advisory Committee

MAP Action Item 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

Key CAO Monitoring Plan Indicators

The key monitoring indicator for this action item established in CAO's first Monitoring Report measures whether the Advisory Committee (AC) is in place and composed of a wide range of recognized local and international expertise in GBV and child protection. In that report, CAO rated the AC's creation as satisfactorily implemented, but noted that its effectiveness was too early to assess, and that a new related indicator would be introduced for the next monitoring phase.³⁴

This report introduces CAO's new indicator for this MAP action, which aligns with CAO's updated monitoring approach focused on both outputs and outcomes. The new indicator assesses the extent to which the AC's technical advice informs the design of the Remediation Program for survivors and related GBV/CSA prevention activities across the five areas CAO's monitoring plan identifies as relevant to adequate implementation. These areas are: (i)

³³ The training documentation for Nominee Directors now includes a separate section addressing child protection and safeguarding risks, identifying high-risk sectors, describing how child-related risks are incorporated into broader risk management frameworks, and outlining the role of Nominee Directors in supporting the institution's assessment of GBV and child protection risks. The Diagnostic Tool now incorporates specific indicators to assess child protection and safeguarding across company policies, codes of conduct, organizational culture, leadership and staff background checks, risk management, and grievance mechanisms, among others.

³⁴ CAO, First Bridge-04 / Learn Capital 01-04 Compliance Monitoring Report, p.22, states that: "CAO determined that this action item [E.1.] 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** [emphasis added]."

alignment with good international industry practice; (ii) access to services; (iii) geographical coverage; (iv) survivor satisfaction with case management and service provision; and (v) sustainability.³⁵ As the AC's advice is expected on an ongoing basis through the life of the Remediation Program, CAO will assess implementation and effectiveness across these five areas in each monitoring cycle. CAO will also keep this indicator open until the Remediation Program is completed.

CAO observations on this IFC action item are therefore divided according to two indicators: firstly, the Advisory Committee's establishment via its composition and functioning; and secondly its effectiveness according to the new indicator covering the five areas above.

Advisory Committee Composition and Functioning

Action Item and Key Indicator	Implementation	Effectiveness	CAO Monitoring Status/Rationale
Advisory Committee CAO effectiveness indicator: <i>Advisory Committee in place with wide range of recognized local and international expertise in GBV and child protection.</i>	Implemented	Effective (Prior rating: Partially Effective)	Open: The Advisory Committee has been established and is therefore considered implemented. While two resignations occurred recently, new members with adequate expertise have since been appointed, and CAO considers the AC's current composition to meet its effectiveness indicator.

IFC's MAP for this case committed to appointing an AC of experts to support both its project level and institutional actions. IFC reported to CAO that the AC launched in August 2024 with a Secretariat established to support its work and monthly online meetings.³⁶ 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. As noted in CAO's first Monitoring Report, CAO reviewed the AC's initial composition and recommended that IFC increase the number of members from Kenya as well as the number of experts on child protection and safeguarding. In February 2025, two new experts joined the AC, a Kenyan NGO representative with experience on issues pertaining to children and an international expert with child protection experience. This brought the Committee's membership to eight external experts and one World Bank Group staff member. In its first monitoring report (July 2025), CAO considered the AC's composition and structural arrangements to be appropriate and in line with the MAP commitment.

IFC's March 2026 MPR stated that the transition from the Remediation Program's design phase to the implementation phase would entail a different role for the AC. As result, IFC

³⁵ CAO, Second Monitoring Plan for the Bridge-04 (Learn Capital 01-04) MAP, January 12, 2026 (five key indicators to assess effective implementation).

³⁶ IFC, Second MPR, p. 7, para. 31.

anticipates restructuring the Committee to focus on targeted, technical input in areas such as information-sharing, coordination between prevention and response, and survivor outreach. CAO was simultaneously informed that the Committee Co-Chairs had resigned in early 2026, reportedly due to divergent views over the need to conduct a formal lessons learned review of the Advisory Committee's work during the Program design phase and the need to update the AC's Terms of Reference for the transition to implementation. In June 2026, IFC informed CAO that two new members had joined the AC.

CAO Assessment

CAO reviewed the CVs of the two new Committee members and concluded that both bring strong expertise in GBV and child safeguarding as well as relevant experience working with survivors of sexual gender-based violence in Kenya. CAO therefore considers that the AC's membership continues to represent a wide range of recognized local and international expertise in GBV and child protection, and the action is effective. However, given that IFC has proposed Committee restructuring during the transition between design and implementation, which may further alter its composition, CAO will keep this action open.

Monitoring Status and Effectiveness Rating: This MAP action remains [open](#). This action has been **implemented** and **effective**.

Advisory Committee Role and Advice

Action Item		Implementation	Effectiveness	CAO Monitoring Status / Rationale
Advisory Committee CAO effectiveness indicator: <i>The Advisory Committee's advice has been duly considered in the Remediation Program across the five areas identified by CAO as relevant to its effective implementation</i>	Alignment with good international practice	Implemented	Effective	Open: As of IFC's fourth MPR, IFC has effectively considered the AC's advice and incorporated most of its suggestions into the design of the Remediation Program. This includes improved practices in CSEA prevention and response.
	Access to Services	Implemented	Partially Effective	Open: As of IFC's fourth MPR, IFC has only partially considered the AC's advice. IFC's decision to restrict the scope of provided services is not fully grounded in GBV and child safeguarding best practices.

	Geographical Coverage	Implemented	Effective	Open: The AC's advice has been incorporated, and the arguments put forward by IFC to restrict the Program's scope are based on objective criteria.
	Survivor satisfaction with case management and service provision	Implemented	Effective	Open: IFC has incorporated AC's advice by including indicators to measure survivor satisfaction.
	Sustainability	Implemented	Effective	Open: AC's advice has been incorporated in IFC's design by including KPIs, cost benefit analysis, and exit milestones.

CAO notes that, during the Remediation Program's preliminary design phase (August 2024 to early 2025), the Advisory Committee (AC) provided substantive guidance on its draft response and prevention components as well as IFC's Good Practice Note (GPN) on Child Safeguarding in Business. IFC's March 2025 MPR states that the AC provided feedback and guidance to IFC, UNFPA, and UNICEF—the two UN agencies leading stakeholder consultations on the Program's design. At that time, IFC also informed CAO that the AC's advice would not be made public.

In November 2025, IFC shared with CAO, on a confidential basis, anonymized guidance received from the AC during the Program's preliminary design process. IFC also provided an explanation of how it considered this guidance and whether it was incorporated into the Program's preliminary design. CAO welcomes this step toward transparency, which helps clarify the nature of the advice IFC sought and how it considered AC input. IFC's March 2026 MPR further confirmed that the AC had reviewed and provided feedback on the GPN on Child Safeguarding, published in November 2025.³⁷

CAO Assessment

In line with the new effectiveness indicator for compliance monitoring, CAO assessed whether IFC reasonably considered the AC's advice in designing and implementing MAP actions, including for the preliminary design of the Remediation Program's response and prevention components. To do so, CAO assessed whether IFC considered the AC's advice in light of globally accepted standards on child protection, child safeguarding, and GBV. In addition,

³⁷ IFC, Addressing Child Safeguarding in the Private Sector, November 2025, <https://officecao.org/3SNJG9M>.

CAO assessed how AC advice was reflected in MAP activities across the five key effectiveness indicator areas: alignment with good international practice; access to services; geographical coverage; survivor satisfaction with case management and service provision; and sustainability.³⁸

1) Alignment with Good International Industry Practice

The AC advised IFC that the Remediation Program should include response and prevention components that clearly distinguish between GBV and CSA and include targeted interventions that reflect the different risks and impacts associated with each. IFC reports having considered this feedback and making adjustments to the service providers' planned Remediation Program to ensure adequate capacity, skills, and experience to support survivors of both CSA and GBV.

IFC also revised planned prevention activities based on AC advice to better distinguish CSA prevention from GBV prevention. In particular, the AC recommended greater emphasis on community engagement and preventive actions specific to CSA, such as engaging parents and caregivers, and addressing digital risks for children. The AC also recommended adjusting the program to better meet the needs of male survivors and persons with disabilities, and IFC reports that it updated the Remediation Program's accessibility criteria accordingly.

Additional AC suggestions included incorporating a grievance mechanism, using technology-enabled cash transfers to facilitate survivors' access to services, and adding further measures to protect survivor privacy, as well as an integrated overall approach to prevention and response, grounded in evidence. IFC accepted these recommendations, which will be further developed during the project's inception phase when the detailed design of response and prevention activities will be completed.

CAO Assessment: CAO considers that the AC's technical advice on the first criterion was adequately considered and mostly incorporated into the Program design, to the extent possible at this stage. CAO therefore considers this action as "implemented" and "effective," because IFC engaged substantively with the advice received and provided well-founded justifications regarding how and why advice was incorporated.

2) Access to Services

The AC provided advice on the scope of services offered to survivors and eligibility criteria for accessing these services. Specifically, the AC recommended revisions to the preliminary Program design to ensure services were accessible to women, girls, men, boys, and survivors with disabilities. IFC considered this feedback and made the necessary adjustments.

³⁸ Advice provided by "single members" or "some members" was not included in this analysis as it does not represent the AC's general view.

The AC also raised concerns that IFC's proposed available funding and planned geographical scope would be insufficient to deliver the full set of services outlined in the MAP. Members expressed concern that the Program might not meaningfully expand services and instead could be limited to awareness and visibility campaigns, and fundraising for GBV service providers. IFC responded by clarifying that the Program will expand service provision, and by adjusting its reach and prioritizing certain counties in Kenya will be able to provide a full range of services, as discussed under the *geographic scope* criterion, below.

A majority of AC members expressed the view that Bridge survivors and the general population should not receive the same set of services. They argued that, from an accountability perspective, Bridge survivors should be prioritized, and the Program, as currently designed, does not recognize their distinct status. The AC also recommended that survivors should receive financial compensation and argued that this approach is not inconsistent with GBV programming. AC members also mentioned that, with appropriate support, financial compensation could serve as a useful intervention, and could be incorporated under the current MAP language. IFC did not revise the Remediation Program in response to this advice. It justified its approach on the basis of non-discrimination obligations, the Program's public good nature, and the fact that IFC does not bear responsibility as a guarantor of environmental and social outcomes. IFC did, however, note that it currently provides support to all known Bridge survivors that have come forward (see sections 2.2.2 and 3), and affirmed that future survivors from Bridge schools that come forward will also have access to local service providers as part of the Remediation Program.

Finally, the AC raised concerns about the limited scope of legal services available to survivors. Specifically, members criticized the Program's failure to provide funding to support legal action against perpetrators, an omission viewed as inconsistent with good practice. IFC did not make any changes in this regard, but clarified that the Remediation Program's detailed design will include access to legal counselling and support for initiating and accompanying survivors through criminal cases. However, funding to investigate, initiate, or litigate civil actions falls outside the scope of standard GBV interventions and will not be supported under the Program.

CAO Assessment: CAO observes that IFC only partially accepted the AC's advice in this area and finds that IFC's reasoning for this is not fully grounded in GBV and child safeguarding best international practices. The AC was established to provide expert guidance on such practices, and IFC's decision to set aside key recommendations is based on a narrow interpretation of the MAP's scope rather than on GBV and child protection expert advice. CAO therefore considers this action area "implemented," since advice was provided and considered, but rates it only "partially effective" given that IFC's rationale for disregarding key expert recommendations is not grounded in good international practice.

3) Geographical Coverage

The AC considered the Remediation Program overly ambitious in terms of its proposed geographic coverage and programmatic scope, and recommended prioritizing activities to increase the likelihood of achieving meaningful impact. IFC considered this advice and clarified that the Program will not operate nationwide, and that priority will be given to counties with a high prevalence of GBV and CSEA, as well as those where Bridge currently operates. IFC also clarified that it will not initiate services in locations where they do not currently exist, citing concerns about sustainability following IFC's exit. IFC did not, however, consider increasing funding to address the underlying capacity concerns raised.

CAO Assessment: CAO observes that IFC incorporated the AC's advice in this area. IFC's arguments for restricting the Program's scope are based on objective criteria and consistent with GBV and child protection programming principles, which require defining a catchment area that can be effectively served and ensures sustainability of services beyond IFC's exit. While this decision may fall short of the MAP's original scope, an issue this report examines in a separate section, CAO finds that IFC has given reasonable consideration to the AC's feedback. CAO therefore considers the advice in this area to be duly considered and designates this action area "implemented" and "effective."

4) Survivor Satisfaction with Case Management and Service Provision

The AC provided advice on KPIs, including the inclusion of survivor satisfaction scores across service types. IFC incorporated this feedback into the KPIs for the Remediation Program's exit milestones. The AC also highlighted research showing that the design of reparations programs can influence whether survivors experience the Program as restorative or healing. In this context, the AC pointed out that IFC's failure to voluntarily acknowledge regret may limit the Program's positive impact on the four Bridge survivors in the CAO case. IFC noted this comment but did not change the Program's design, expressing confidence that by addressing the majority of these survivors' requests (including the provision of economic empowerment opportunities) the Program will have a meaningful and positive impact on the four Bridge complainants and other survivors it supports.

CAO Assessment: While CAO finds the research shared by the AC to be of significant value and relevance, it considers reasonable IFC's rationale that the Remediation Program as designed may still deliver meaningful impact for Bridge survivors and others. The range of planned services provides a foundation for a survivor-centered approach, in which individual needs of survivors drive service delivery. CAO underscores the importance of continuously incorporating survivor feedback and proactively adapting the Program as issues arise through grievance mechanisms and surveys. If the question of institutional acknowledgment of responsibility emerges as a significant concern among Bridge survivors in the course of the Remediation Program, IFC should consider communicating with survivors using language

consistent with its zero-tolerance statement. CAO therefore considers the advice in this area to be duly considered and designates this action area “implemented” and “effective.”

5) Sustainability

The AC advised that organizational strengthening measures would depend critically on strong leadership, a clear vision, a culture of continuous learning, robust monitoring and evaluation, and adequate financing. IFC considered this advice and updated the Program to support NGOs in these critical areas. The AC also provided detailed recommendations to include a cost-benefit analysis in evaluating Program outcomes, add specific KPIs on access, service delivery, child-specific outcomes, and quality, and establish clear exit milestones. IFC incorporated such recommendations into its monitoring framework, and will further develop them in the detailed design of the Program’s response and prevention activities.

CAO Assessment: CAO considers that the AC’s advice in this area was adequately considered and incorporated into the Program design to the extent possible at this stage. Accordingly, CAO considers this action area “implemented” and “effective.” CAO notes that Program design and implementation remain ongoing and AC advice will be reassessed in the next monitoring cycle.

CAO will keep this action item open and will continue to monitor the AC’s composition, functioning, and influence during the implementation phase. Specifically, CAO will monitor: (a) any change in AC’s composition and the appointment of members with appropriate expertise; (b) whether the restructured AC’s Terms of Reference preserve a meaningful advisory role; and (c) whether IFC continues to adequately consider AC feedback in implementing response and prevention activities.

CAO looks forward to receiving information on the new AC’s terms of reference. In the interest of transparency and accountability, CAO also strongly encourages IFC to share Advisory Committee feedback with CAO on an ongoing basis (e.g., every quarter).

Monitoring Status and Effectiveness Rating: This MAP action remains [open](#). This indicator has been considered **implemented** and **effective** across four of the five critical areas assessed, with the fifth considered **partially effective**.

2.2. Additional IFC Actions Taken in This Monitoring Period

This subsection presents CAO’s assessment of MAP actions newly implemented during this monitoring period—July 2025-June 2026—that were not assessed in CAO’s first Monitoring Report. In particular, CAO’s observations focus on the in-country response and prevention components of the Remediation Program for survivors of child sexual abuse. CAO observes that IFC has made substantive progress in establishing the foundations for both the

Remediation Program and community-based prevention activities, including developing a preliminary Program design and selecting UNFPA and UNICEF as implementing partners. However, many operational elements that will determine Program effectiveness, such as finalized service protocols, provider selection and vetting, results frameworks and KPIs, outreach modalities, grievance arrangements, and transition measures for the four CAO complainants, remain under development and are therefore not yet evaluable.³⁹ CAO also notes that interim direct support to the four Bridge survivors has been only partially implemented. Based on survivor accounts, this support has not been effective to date in terms of timeliness, continuity of care, and the survivor-centered quality of service delivery. Each of these new actions and CAO's corresponding implementation and effectiveness assessments are examined below.

MAP Action Items A.1.a. Project Preparation Plan for the Design Phase (Selection of Implementation Partners); A.1.b. Implementation (Preliminary Work on the Design of Technical Guidance Materials and Service Protocols); A.1.c. Results Framework (Preliminary Work on its Design)

2.2.1. MAP Actions for In-Country Remediation Program and Prevention Activities for CSA Survivors: Remediation Program Design

Key CAO Monitoring Plan Indicators

Action Item		Implementation	Effectiveness	CAO Monitoring Status / Rationale
Remediation Program Component 1: Case Management and Service Provision to Survivors of Child Sexual Abuse	CAO effectiveness indicators: 1. Alignment with good international practice: The Remediation Program's technical framework (e.g. guidance materials, service protocols, communications materials, etc.) reflect alignment with good international practice pertaining to child protection and safeguarding, and GBV programming principles (e.g. include steps that guarantee safety and confidentiality; are survivor-centric; universally accessible; etc.), and are reviewed by recognized experts, including the Advisory Committee.	Partially Implemented	Not Yet Evaluable	Open: The monitoring status remains open, pending the review of the Remediation Program's technical framework, including draft and final program documentation and protocols. This is currently being prepared by IFC and the implementing partners - UNFPA and UNICEF.

³⁹ In July 2026, IFC shared additional information with CAO on the final design of the Remediation and Prevention Program. As this information was received after the preparation of this report, it will be analyzed in CAO's next monitoring report.

	2. Access to services: Survivors have access to the full range of services included in the MAP according to their needs -psychosocial, healthcare (including sexual and reproductive health services), access to justice, livelihood support, continued education support, and financial support to access, among others.	Not Yet Implemented	Not Yet Evaluable	Open: The Remediation Program has not been implemented.
	3. Geographical coverage: Program covers all counties where Bridge International Academies operates or operated.	Not Yet Implemented	Not Yet Evaluable	Open: Pending CAO's ex-ante review of IFC, UNFPA, and UNICEF's assessment of provider credentials. CAO will also review ex-post service delivery data.
	4. Survivor satisfaction with case management and service provision: Survivors are satisfied with case management services and with the timeliness and quality of services received.	Not Yet Implemented	Not Yet Evaluable	Open: Remediation Program has not been implemented. Therefore, broad survivor satisfaction and case-management records, including surveys, anonymized case management report records, and outreach logs are not available for review.

	5. Sustainability: All providers have developed strategic and resource plans that strengthen service provider strategic planning, operations, and fundraising to sustain services during and after IFC's involvement.	Not Yet Implemented	Not Yet Evaluable	Open: Pending ex-ante review of strategic and resource planning procedures. CAO also plans to undertake ex-post reviews of annual service provider surveys where CAO will look for indications that the technical assistance received by providers to enhance their sustainability (per the strategic and resource planning plans) is boosting the sustainability of services.
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During this monitoring period, IFC continued advancing the design of the response and prevention components of the Remediation Program for Survivors of Child Sexual Abuse in counties where Bridge operated or currently operates in Kenya.

In July 2025, IFC's third Management Progress Report (MPR) to the Board presented a preliminary design for a three-year, USD 12 million Program.⁴⁰ This blueprint includes results indicators, exit milestones, and consideration of the average timeframe taken by survivors to disclose their abuse. The Program duration will be updated based on progress against metrics defined during the ongoing design phase, in consultation with CAO and the Board. The current design has two primary components:

1. **Response:** supporting local GBV and CSA service delivery through case management and an essential services package for survivors.
2. **Prevention:** implementing life skills education for adolescents and community engagement to reduce acceptance of CSA.

CAO notes that many operational elements critical to Program effectiveness are not yet defined. According to IFC, these will be jointly developed with the recently-selected implementing partners, UNFPA and UNICEF, in a detailed design document for the Remediation Program, and will include:

- i. **Selection of local GBV and CSEA service providers** that will deliver services directly to survivors. While the MPR establishes selection criteria—adherence to international standards, broad geographic coverage, and financial sustainability,⁴¹ provider identification and vetting has not yet begun.

⁴⁰ IFC, Third MPR Bridge-04, <https://officecao.org/4eSGIPo>.

⁴¹ IFC, Third MPR, pp. 36–37, Annex 6.

- ii. **Technical guidance materials, service protocols, and referral pathways** that will govern how case management and the essential services package are delivered in practice. The preliminary design describes the types of services to be provided, including medical care, psychosocial support, legal assistance, economic empowerment, and financial assistance⁴² and outlines a case management approach.⁴³ However, the detailed protocols, such as caseload ratios, frequency of contact with survivors, escalation procedures, and quality assurance mechanisms, remain to be defined.
- iii. **Results framework including finalized key performance indicators (KPIs), targets, and exit milestones.** Preliminary design includes illustrative indicators—counties reached, proportion of survivors accessing services, survivor satisfaction rates.⁴⁴ Not yet agreed are the Program’s final KPIs, targets, and exit milestones, all of which are required under MAP commitments for duration adjustment “in consultation with CAO and the Board.” These indicators will serve as the basis for determining whether the Program should extend beyond the initial three years, in consultation with CAO and the Board.⁴⁵
- iv. **An outreach strategy** for informing survivors, including former Bridge students, about the Program and how it will facilitate safe access to services. The preliminary design references outreach in counties with current or former Bridge schools and engagement with organizations in a Bridge referral database,⁴⁶ with a detailed methodology to follow.
- v. **A grievance redress mechanism**, to be established and managed by the implementing partner.⁴⁷ Protocols, reporting channels, and feedback timelines are still to be defined.
- vi. **Baseline surveys** to establish initial conditions against which the implementing partner will measure program outcomes have yet to be prepared and socialized.⁴⁸
- vii. **Sub-grant agreements** between the implementing partners and local service providers, including disbursement conditions and performance requirements, are not yet in place.⁴⁹
- viii. **Transitional arrangements for the four Bridge complainants** to ensure they receive uninterrupted services when the Remediation Program launches are not yet in place.
- ix. A response on whether survivors that identify as Bridge survivors during Program implementation will be eligible for the reimbursement of past expenses, as requested by known Bridge survivors that are complainants.

CAO Assessment

CAO’s review concludes that IFC’s preliminary USD 12 million Program design sets out overarching program objectives, core principles, and component structure, alongside general

⁴²IFC, Third MPR, pp. 18–20, paras. 26–32.

⁴³IFC, Third MPR, pp. 17–18, paras. 22–25.

⁴⁴IFC, Third MPR, pp. 26–27, paras. 51–53.

⁴⁵IFC, MAP Action 1 (“The overall duration of the program will be a minimum of 3 years to be adjusted based on the outcomes of the design phase of the program, in consultation with the CAO and the Board and may not exceed 10 years.”).

⁴⁶IFC, Third MPR, pp. 23–24, paras. 45–46.

⁴⁷IFC, Third MPR, p. 24, para. 46.

⁴⁸IFC, Third MPR, p. 27, para. 53.

⁴⁹IFC, Third MPR, pp. 22–23, paras. 37–43.

implementation arrangements. It references recognized international good practice frameworks and standards, including the Inter-Agency GBV Minimum Standards, the UN Essential Services Package for Women and Girls Subject to Violence, and the Caring for Child Survivors Guidelines. The design principles are generally consistent with established international standards for GBV/CSA programming. CAO notes, however, that IFC did not report integrating all the advice from its Advisory Committee on how to strengthen the final design of the Program's response and prevention components in line with good international industry practice (see section 2.1.4 above). On this basis, CAO considers the preliminary design to partially meet fundamental good practice requirements and to provide a partially appropriate foundation for detailed design.

CAO acknowledges IFC's phased approach to project development, with a detailed design jointly developed with implementing partners to follow, and notes that missing elements at this stage do not, in themselves, indicate a shortcoming. However, the pending operational details listed above will ultimately determine whether the Program is effective at achieving its objectives and will be a focus of CAO's next monitoring cycle.

2.2.2. MAP Actions for In-Country Remediation Program and Prevention Activities for CSA Survivors: Selection of Implementing Partners

Key Monitoring Plan Indicators

Action Item and Key Indicator	Implementation	Effectiveness	CAO Monitoring Status/Rationale
Selection of implementing partner/s CAO effectiveness indicator: <i>Selection process is open, transparent, and has selection criteria that fits the local context.</i>	Implemented	Partially Effective	Closed: CAO will close this action, which it considers partially effective. While the process led to the selection of implementing agencies with adequate expertise and knowledge, it did not follow an open process that could have resulted in a stronger selection outcome.

IFC's third MPR committed to "recruit, through a quality-based selection process, a suitable NGO or UN agency to implement the overall program," and included an annex outlining the selection criteria.⁵⁰ In its fourth MPR, published March 2026, IFC reported selecting UNFPA and UNICEF as co-implementing partners, a modification from the original plan to engage a single implementing partner.⁵¹ IFC explains that it "opted to partner with two organizations to draw directly on the deep, field-tested expertise of each in their respective focus areas: GBV and CSEA."⁵² This decision draws on the specialized expertise of UNFPA as the lead UN

⁵⁰ IFC, Third MPR, p. 16, para 16.

⁵¹ IFC, Fourth MPR, p. 2, para. 9.

⁵² Ibid.

agency for GBV prevention and response, and UNICEF as the lead agency for child protection and CSA prevention. Each partner will oversee a network of local service delivery organizations. The two grants were approved by IFC Management on January 28, 2026,⁵³ and grant agreement negotiations followed. IFC had anticipated that the Remediation Program would commence its implementation in May 2026,⁵⁴ but that deadline has been delayed.

CAO Assessment

CAO notes that the selection of two co-implementing partners, rather than one, has the potential to strengthen the Program by bringing distinct and complementary expertise in GBV response (UNFPA) and child protection (UNICEF). CAO also notes that both agencies led the stakeholder consultations that informed the Program design. While CAO does not view this as disqualifying, it observes that some members of the Advisory Committee raised the dual role as a potential conflict of interest.

CAO's Monitoring Plan Indicators for the MAP design phase included a commitment to assess whether the selection process for the implementing partner was open and transparent, with selection criteria that fit the local context. To assess this, CAO requested additional information from IFC which, in March 2026, reported using a systematic and transparent approach with an open, competitive consultation process designed to collect input from a broad range of stakeholders. Through this process, IFC pre-identified a pool of international NGOs and multilateral agencies with the ability to implement a Program of this scale and assessed potential partners against predefined criteria.⁵⁵ Following a rigorous assessment, IFC states that it selected UNFPA and UNICEF based on their complementary mandates, robust safeguarding systems, operational presence in the region, and longstanding partnerships in Kenya's GBV and child protection sectors.

Based on the information provided, CAO understands that IFC engaged the implementing partners through a direct selection process in the form of a grant mechanism that applied transparent selection criteria that fit the local context. However, while the criteria disclosure was transparent, the process was not open to competitive proposals, as the candidates considered were pre-selected by IFC. This approach limited the pool of potential implementing partners for this assignment and lacked transparency in the evaluation methods applied by IFC and in the award decision, which was not publicly disclosed.

IFC has an obligation to ensure its funds are spent appropriately, and open selection processes are an important mechanism for enabling public scrutiny, including by civil society.

⁵³IFC, Fourth MPR, p. 2, para. 10.

⁵⁴*Ibid.*

⁵⁵ Technical expertise in GBV and CSEA, operational capacity and safeguards, financial and legal compliance, community outreach capabilities, grant management experience, monitoring and evaluation systems, and the ability to strengthen local service providers. See, IFC, Third MPR, Annex 6: Selection Criteria for the Implementing Partner and Service Providers, p. 36.

Given the public interest in the Bridge case and the significant social dimension of the Remediation Program's response and prevention components, CAO, in line with its monitoring indicators, finds that an open process would have provided a greater degree of transparency and accountability.

CAO therefore considers this action "implemented", but only "partially effective", as only one of the effectiveness indicator's sub-criteria (criteria fit to local context) was fully met, while transparency was only partially satisfied. Although the process likely resulted in the selection of implementing agencies with adequate expertise and knowledge, the absence of an open, competitive process undermined the selection outcome and limited the level of transparency that the circumstances warranted.

2.2.3. MAP Actions for In-Country Remediation Program and Prevention Activities for CSA Survivors: Direct Support to CAO Complainant Bridge Survivors

Key CAO Monitoring Plan Indicators

Action Item		Implementation	Effectiveness	CAO Monitoring Status / Rationale
Remediation Program Component 1: Case Management and Service Provision to Survivors of Child Sexual Abuse	CAO effectiveness indicators: 2. Access to Services: Survivors have access to the full range of services included in the MAP according to their needs - psychosocial, healthcare (including sexual and reproductive health services), access to justice, livelihood support, continued education support, and financial support to access, among others.	Partially Implemented	Not Effective	Open: The emergency program, focused exclusively on the four complainants, has not been effective at providing services in a timely and efficient manner.
	4. Survivor satisfaction with case management and service provision: Survivors are satisfied with case management services and with the timeliness and quality of services received.	Partially Implemented	Not Effective	Open: The emergency program, focused exclusively on the four complainants, has been operational for approximately one year. Case management, timeliness, and quality have been lacking for all four complainants.

Direct Support Provision

In March 2025, IFC began to offer direct support to the four Bridge survivors that are Learn Capital complainants through a local GBV service provider.⁵⁶ IFC established this arrangement ahead of the wider Remediation Program's operational launch to allow these complainants and known survivors to begin accessing services with the least delay possible. Each complainant received an offer to work with a case manager to access a range of services, including medical care, psychosocial support, legal assistance, and economic empowerment opportunities. IFC reported to CAO that it receives regular anonymized reports on the services provided and covers the associated costs.

Survivor Accounts of Service Experience

As detailed in Section 3 (Complainant Comments), the four complainants reported several challenges regarding the quality and timeliness of these services. Their experiences are presented below with references to good international practice in GBV and CSA programming, drawing on global standards such as the Inter-Agency GBV Minimum Standards, the UN Essential Services Package for Women and Girls Subject to Violence, and the Caring for Child Survivors Guidelines.⁵⁷ Survivor accounts of their IFC-supported service experiences include the following key insights:

1. **Counselling services:** Initially, the toll-free counseling line provided to the survivors assigned a different counselor for each call made, disrupting continuity of care. This was corrected after survivors' representatives raised concerns with IFC, leading to the assignment of dedicated case managers. (*Applicable good international practice principles: continuity of care / survivor-centered approach*).
2. **Economic empowerment support:** Survivors experienced slow progress in obtaining economic empowerment assistance, requiring repeated follow-up efforts on their part to move processes forward. (*Applicable good international practice principles: accessibility / proactive delivery of support*).
3. **Technical guidance for business and career planning:** Two complainants were asked to prepare business plans and budgets without adequate mentorship in business development; another was asked to identify career paths and estimate costs without prior career orientation or advisory support. While service providers eventually gave additional support, the complainants still lack a clear understanding of how the training offered aligns

⁵⁶IFC, Fourth MPR, p. 2, para. 11.

⁵⁷ UNFPA, Addressing Gender-Based Violence Across Contexts: Gender-Based Violence Interagency Minimum Standards and the Essential Services Package for Women and Girls Subject to Violence, 2022, <https://bit.ly/3P9WgP0>; UN Women, Essential services package for women and girls subject to violence, 2015, <https://officecao.org/4t2zruu>; UNICEF, Caring for Child Survivors of Sexual Abuse Guidelines, 2010, <https://officecao.org/3QB9GEC>. These standards inform the Board-approved MAP indicator for Component 1, which requires that case management and survivor services: guarantee safety and confidentiality; follow a survivor-centered approach, ensuring services are tailored to needs and delivered with respect and empathy; and be universally accessible, removing barriers to timely use.

with their individual case plans. (*Applicable good international practice principles: survivor-centeredness / tailored, informed consent in program activities*).

4. **Proactive engagement by case managers:** Survivors noted limited proactive contact by case managers and restricted availability outside standard business hours, impacting access for individuals who have daytime work commitments. (*Applicable good international practice principles: accessibility / survivor-centered scheduling*).

In reporting to CAO, complainant representatives acknowledge IFC's responsiveness in addressing some concerns, for example the shift to dedicated case managers, but also express concern that IFC may not have sufficient visibility into whether the services it funds effectively meet survivor needs in practice.

CAO Assessment

The direct support for four complainants who are Bridge survivors forms part of the first component of IFC's Remediation Program. While it demonstrates early implementation of core service elements, CAO finds effectiveness lacking, as outlined by the complainants' testimonies. Overall, in the survivors' own view, the services provided have not been either timely or efficient. Therefore, although IFC has been responsive in addressing some of the concerns raised, the service provision process cannot be considered in full alignment with the principles of good international practice.

CAO considers the complainants' experience crucial for anticipating potential service delivery risks during full program implementation. The challenges identified mirror several key risk areas in GBV/CSA programming at scale, namely:

- Maintaining continuity of care and personalized survivor support
- Ensuring timely and proactive service delivery
- Providing adequate technical guidance and orientation for survivor decision-making
- Aligning service availability with survivor circumstances.

These points directly relate to CAO's monitoring indicator on alignment with good international practice on GBV and CSA service delivery, particularly the need for survivor-centered, universally accessible services. The service-quality concerns suggest gaps in consistent application of these principles.

CAO encourages IFC to incorporate these preliminary CAO observations into the detailed design of the Remediation Program, notably in developing quality assurance mechanisms capable of identifying and resolving service gaps promptly. This should include (i) clear performance standards for case managers, (ii) proactive outreach protocols, and (iii) survivor satisfaction monitoring processes.

Monitoring Status and Effectiveness Rating: MAP actions remain open, **partially implemented** or **not yet implemented**, and **not yet evaluable**, except for (i) the selection of implementing partners, which is closed and **implemented**, but only **partially effective**; and (ii) the direct support to the four Bridge survivors, which is open and rated **partially implemented** and **not effective**.

3. Complainant Comments

3.1. Background

On April 10, 2026, and July 1, 2026, CAO received comments from the four Bridge-04/Learn Capital 01-04 complainants, through their representatives, on the previous year of IFC's MAP implementation. In the comments, the four former Bridge students who suffered sexual abuse stated that they have been offered access to GBV recovery and referral services organizations in Nairobi since April 2025. These services have also included a one-day financial literacy training and support for further education, both provided by a separate organization since June 2026. To date, three of the four Bridge survivors have engaged with a case manager from the GBV support organization and begun receiving services, albeit at a slower pace than expected. The fourth survivor has only recently begun re-engaging with the GBV organization, but continues to face barriers that prevent her from taking full advantage of the services available.

Regarding broader implementation of the Remediation Program, the complainants' representatives stated that they remain largely uninformed of its evolution since IFC engaged the implementing partners in early 2026.

3.2. Comments

According to complainants' representatives, the three complainants who have continually engaged with support services reported that their initial experience with the GBV organization was challenging. For instance, service providers delivered counselling and other services through a toll-free line with a different counsellor assigned each time they called, which did not contribute to a sense of safe space. This issue has since been addressed, with the complainants assigned a dedicated case manager. However, survivors also report communication challenges with this assigned case manager, who was then replaced with yet another counselor assigned to their case to monitor implementation by a new provider.

Separately, the complainants also requested support to access economic empowerment services. In response, they were asked by the GBV service provider to develop and submit business plans and budgets without sufficient technical guidance or mentorship in business development.⁵⁸ The survivors report receiving no feedback on these plans since submitting them over three months ago.

In addition, the complainants were offered access to a one-day financial literacy training by a separate organization that would later provide some guidance and connections to education and training options. While their representatives report that the relationship with this new institution is generally positive, significant coordination issues have emerged in the referral

⁵⁸ For example, rather than providing targeted guidance, the case manager suggested that the complainant refer to other complainants' proposal as a template. Additionally, one of the complainants who had requested educational support was asked to independently identify career pathways and estimate related costs, without having first received career orientation or advisory guidance.

process between the GBV service provider and this new organization which has had a negative impact on the complainants' referral experience.

As an example, the new provider contacted the complainants unexpectedly to attend a financial literacy course without a proper introduction to the training by the current case manager. Their assigned case manager then failed to respond to numerous queries from the complainants about the nature of the training and how it fit into their respective case plans or roadmaps. Finally, complainants only received a week's notice for the training, which meant they had little time to make childcare arrangements or request time off work. Consequently, only three of the four complainants could attend the training. Those who did so found the training valuable and subsequently applied for and received an associated micro-grant (KES 40,000/ USD 309) to support their entrepreneurial endeavors.

The complainants have maintained contact with this new provider and shared their respective desires for further education and training. The provider, while being transparent about financial and other limitations, indicated an openness to further support the complainants to pursue various educational options. One complainant has since started attending a certificate course, while the rest are engaging with the new provider with some having already been accepted into their chosen program. All have received assurances that the costs of pursuing their further education would be covered.

Despite improvements, the complainants continue to raise concerns about both the pace and quality of the support process offered by the GBV organization and new provider. They report that obtaining economic empowerment support has been slow and required sustained, high-effort engagement on their part. As a result, complainants describe confusion over the overall direction and state that at times they have experienced fatigue. They consider this situation partly due to the change in case managers, which requires complainants to restart the process with new staff who, in their view, are often not clear about the process, timeline, and requirements for complainants to receive the services requested.

Poor coordination has been a significant concern, more recently resulting in one complainant paying for ancillary costs out-of-pocket in order to attend her preferred course, including costs such as child-minding, daycare or transport costs, without any clear indication of how these will be reimbursed. The complainants' representatives note that this raises concerns about the unclear relationship between the new provider and the GBV organization, and about how the former's services fit into each complainant's individual roadmap.

Regarding the fourth complainant: her representatives informed CAO and IFC that she has had difficulties accessing the support services. After meeting with the previous case manager more than six months ago, she was unable to meet with the replacement, causing her support to stall. Due to financial hardship, she was then forced to discontinue her education to search for employment to help meet her family's financial needs. She obtained a job about an hour and a half outside Nairobi where she is required to work all week, with limited breaks and no time off. While she has been recently contacted by both the GBV organization and new

provider, she continues to face barriers that prevent her from accessing services alongside the other survivors. For example, she was unable to attend the financial literacy training and therefore did not receive the micro-grant offered to participants.

Complainants' representatives acknowledge IFC responsiveness in addressing concerns as they arise, including the early correction regarding case managers. However, they express concern that IFC may be insufficiently involved in the quality management of services provided and may not have adequate visibility into whether those services are appropriately laid out in a roadmap or case plan, or whether they effectively meet survivor needs. They also urged IFC to offer further support for educational and training options available to survivors that could lead to meaningful employment opportunities, and to consider more financial support for the fourth complainant, enabling her to access service activities by covering her daily wages.

Regarding the broader Remedial Program in development, the complainants' representatives note they have not been informed about how IFC assesses accreditation of referral services. Nor have they learned how anonymized data will be collected on any self-identifying Bridge survivors that approach service providers. They seek clarity on how services will adapt to survivors' needs, particularly those who experienced harm several years ago or face other access barriers.

In addition, the representatives raise concerns about whether and how IFC is incorporating survivors' feedback into the Program's forthcoming detailed design as well as the management of individual cases. They report remaining uninformed about the evolution of Program activities or the results framework since IFC engaged the implementing partners and have not been asked to comment or consult on the draft key performance indicators and exit milestones. Similarly, they refer to the Advisory Committee as an "opaque organ," having received no information on its membership, evolving mandate or responsibilities, and noting the lack of public scrutiny over the AC's technical advice and decision making.

They also note the slow process for these four survivors to receive immediate support from the local GBV services organizations. Implementing and troubleshooting this process has now extended beyond a year only now starting to receive more substantive referral or support services. This suggests that the three-year timeframe envisioned by IFC in its preliminary Remediation Program should be revised to adequately address the needs of thousands of survivors that may come forward once the program is initiated, as well as to address the challenges all survivors will continue to face.

4. Conclusion and Next Steps

This monitoring period marks a pivotal stage in the implementation of IFC's MAP for this case. Two years after IFC's Board approved the remedial Management Action Plan for Bridge-04, CAO observes measurable progress across both the institutional strengthening and project-level MAP actions, alongside a clear trajectory toward roll-out of the Remediation Program's response and prevention components. While CAO finds that several IFC commitments have been fully and effectively implemented, notable gaps remain that will require sustained attention during the next phase. The current moment represents a transition from planning to execution, where both operational clarity and quality control will be decisive in determining overall impact in support of survivors of gender-based violence and child sexual abuse.

Providing interim direct support to the four Bridge complainants is a positive action, yet complaints regarding timeliness, proactivity, and service quality underscore continued challenges in accessing effective remedy for survivors who have been awaiting support for a prolonged period and signal early operational risks. CAO encourages IFC to address these concerns promptly and apply lessons learned to the service provider terms of reference and quality assurance systems for the Remediation Program.

Finalizing the results framework, KPIs, targets, and exit milestones, will be central to the Remediation Program's governance. CAO therefore recommends that IFC shares the proposed indicators and milestones with the Board and CAO before finalization.

4.1. Looking Ahead

The following IFC actions will be central to the next monitoring period:

1. Finalization of the detailed Remediation Program design by UNFPA and UNICEF and commencement of program implementation.⁵⁹
2. Selection of local GBV and CSA service providers, including assessment of their credentials, geographic coverage, and capacity to deliver survivor-centered, child-sensitive services.
3. Development and finalization of the results framework, including KPIs, targets, and exit milestones, in consultation with the Board as provided in the MAP.
4. Development of inception documents: namely, technical guidance materials, service protocols, case management standards, the outreach strategy, the grievance redress mechanism, and baseline surveys.
5. Clarification of the Advisory Committee's role during the implementation phase, including updated terms of reference.
6. Continued provision of direct support services to the four Bridge complainants, with improvements to address the timeliness and quality concerns identified in this report.

⁵⁹ Note that the Remediation Program's detailed design or operational manual is referred to by UNFPA and UNICEF as the "Inception Report" and will likely appear titled as such in future IFC Management Progress Reports.

CAO will undertake the following activities during the next monitoring period:

- a) Review documents related to the detailed design of the Remediation Program's response and prevention components, including the finalized results framework, service provider selection and credentialing, technical protocols, case management standards, outreach strategy, mapping/service gap analysis, situational analysis, and grievance redress mechanism.
- b) Assess the Advisory Committee's new terms of reference, and the extent to which IFC adequately considers its contributions in the implementation phase.
- c) Continue engagement with the four complainants and their representatives to monitor service delivery effectiveness.
- d) Review the effectiveness of Portfolio Review action plans (MAP action item C.1.a), operationalization of the zero-tolerance statement (C.5.a), and IFC's updated training materials for staff (D.2.a.) and external GBV consultants (D.2.b.).
- e) Continue ongoing engagement with IFC through regular meetings.

Annex 1: MAP Activities Closed After CAO's First Monitoring Report⁶⁰

Project-Level Actions to Establish the In-Country Response and Prevention Components of the Program for Survivors of Child Sexual Abuse⁶¹

Key IFC Deliverable	Select Key Indicators to Assess Effective Implementation	Monitoring Type	Monitoring Results ⁶²	Status and Action Rating
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. Involves a wide range of stakeholders, including local/international organizations, and local/international child protection experts d. Is rated satisfactorily by participants.	Ex-Ante	a. Satisfactory b. Partially satisfactory c. Satisfactory d. Undetermined	Closed: Partially Satisfactory

Institutional Level Actions

Key IFC Deliverable	Select Key Indicators to Assess Effective Implementation	Monitoring Type	Monitoring Results	Status and Action Rating
Updated investment agreement templates	E&S provisions are: • CSA specific • Designed to effectively minimize, report, document, and respond to CSA risks • Enforceable.	Ex-post	Satisfactory	Closed Satisfactory
Updated methodology that includes child protection and safeguarding elements	• Updated project risk screening tool includes CSA considerations • Mechanism in place to ensure mandatory application.	Ex-post	Satisfactory	Closed Satisfactory
Updated questionnaires and annual monitoring template that includes child protection and safeguarding	• E&S due diligence questionnaires and reporting templates include consideration of CSA risks.	Ex-post	Satisfactory	Closed Satisfactory
Staff and STC hiring	• Newly-hired staff and consultants have significant experience in child protection.	Ex-post	Partially satisfactory	Closed: Partially satisfactory

⁶⁰ Additional information on the closed monitoring activities can be found in the first CAO monitoring report, <https://bit.ly/4yyNyf0>.

⁶¹ 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.

⁶² These monitoring results are different from those in this report as they use the former CAO rating method of Satisfactory/Partially satisfactory/Undetermined.

Annex 2: CAO Monitoring Plans

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

CAO's used indicators to measure the effective implementation of key IFC activities. Based on each IFC deliverable's relevance to the Remediation Program design, CAO's monitoring included two types of activity—"ex-ante" (before the event) and "ex-post" (after the event). 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	a. 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/international organizations, and local/international child protection experts d. Is rated satisfactorily by participants.	Ex-ante
	b. Mapping/service-gap analysis	Mapping considers a wide spectrum of organizations, including grassroots organizations in less accessible counties.	Ex-post
	c. Situational analysis	Situational analysis is comprehensive and reflects assessment of contextual risks and opportunities.	Ex-post
	d. Selection of implementing partner(s).	Selection process is open, transparent, and has selection criteria that fits local context.	Ex-post
Portfolio review to identify child sexual abuse and GBV risks in investments and determine appropriate risk management measures	Portfolio Review Summary Report	Adequacy of actions in response to findings	Ex-post
Include review of the E&S provisions in template investment agreements	Updated investment agreement templates	E&S provisions are: - CSA specific - Designed to effectively minimize, report, document, and respond to CSA risks - Enforceable.	Ex-post
Update and make mandatory existing gender and GBV project risk screening; include child	Updated methodology that includes child protection and safeguarding elements	- Updated project risk screening tool includes CSA considerations - Mechanism in place to ensure mandatory application.	Ex-post

protection and safeguarding			
Review and update E&S due diligence questionnaires and reporting templates	Updated questionnaires and annual monitoring template that includes child protection and safeguarding	E&S due diligence questionnaires and reporting templates consider CSA risks.	Ex-post
Zero tolerance statement	Statement and evidence of operationalization	- Zero tolerance statement issued and operationalized through elements such as: - 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 any member of the public, to report allegations of GBV/CSA related to an IFC investment - 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).	Ex-post
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	- 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 is designed and is ready to implement.	Ex-post
	Guidance Material: a) Good Practice Note on Child Safeguarding b) GBV company diagnostic tool c) Guidance for IFC nominee directors.	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 3: IFC's Bridge-04 Management Action Plan (MAP)

#	Action	Deliverable/Timeline
Project-specific Actions		
1	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. 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. 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. 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: (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. 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	1a. Project Preparation Plan for the design phase • Stakeholder engagement / community consultation plan The stakeholder engagement plan will be survivor-centered and will include a protocol on safe and ethical consultation with survivors of child sexual abuse, should they wish to participate. • Mapping / Service-gap analysis • Situational analysis • Selection of implementation partner/s • Implementation Plan • Logistics Plan <i>Timeframe:</i> 6 months from start, subject to required (including government) approval processes 1b. Implementation • Technical guidance materials • Service protocols • Information, education and communications materials <i>Timeframe:</i> Over the lifespan of the program 1c. Results Framework (indicative dates to be adjusted based on the final design of the program) <i>Timeframe:</i> FY25 Mid-term review <i>Timeframe:</i> FY26 Final evaluation <i>Timeframe:</i> FY27 1d. Sustainability, Transfer and Exit Strategy Transition /exit plan <i>Timeframe:</i> Midterm review FY26/27

	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. Prevention activities are further described in Action 2 below. 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.	
2	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. 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. Activities will involve families and all genders.	2a. Plan of Action: Outline of prevention interventions using participatory methods <i>Timeframe:</i> FY25 2b. Training of community facilitators/mentors <i>Timeframe:</i> FY25 2c. Implementation (as outlined in Action 1) <i>Timeframe:</i> over program lifecycle Timelines as per Action 1 (indicative dates to be adjusted based on the final design of the program) Implementation Plan – <i>Timeframe:</i> FY25 Mid-term review <i>Timeframe:</i> FY26 Final evaluation <i>Timeframe:</i> FY27 Transition /exit plan <i>Timeframe:</i> subject to review in FY26/27
Institutional-Level Actions		
3	IFC will:	3a. Summary Report

	a. 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. b. 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. c. 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. d. 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. e. Issue a statement to staff on zero tolerance for inaction on or reprisals for addressing GBV or child protection issues and operationalize it.	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. <i>Timeframe:</i> Q2 FY25 3b. Updated investment agreement templates. <i>Timeframe:</i> FY25 3c. Updated Gender and GBV Project Risk methodology to include child protection. GBV and child sexual abuse methodology, digitalization, and guidance. <i>Timeframe:</i> Q1FY25 3d. Updated questionnaires and annual monitoring templates to include child safeguarding. <i>Timeframe:</i> Q1 FY25 3e. Statement <i>Timeframe:</i> FY24
4	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. b. IFC will deliver the following capacity building actions: - 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. c. IFC will develop the following tools and guidance: 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	4. Capacity building deliverables 4a. Increase GBV specialist staffing <i>Timeframe:</i> Q4 FY24 4b.1 Annual training plan <i>Timeframe:</i> 1Q FY25 4b.2 Regional external GBV consultants' workshops <i>Timeframe:</i> FY 25 4c. Tools and guidance 4c.1 Good Practice Note on Child Safeguarding in Business

	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.	<i>Timeframe:</i> FY25 4c.2 GBV Company Diagnostic Tool <i>Timeframe:</i> FY25 4c.3 Guidance to IFC Nominee Directors Timeframe: FY24 and on-going for new nominees as they join
5	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.	Advisory Committee in place and functioning. <i>Timeframe:</i> Q4FY24