

Joint Statement on Bridge 4 Management Action Plan Implementation Expressing Civil Society and Survivor Concerns

14 November 2024

Between 2013 and 2022, the International Finance Corporation (IFC) invested \$13.5 million in Bridge International Academies, a for-profit school chain in Kenya, to support affordable education for low-income children. In 2020, allegations of child sexual abuse within Bridge schools surfaced and the Compliance Advisor Ombudsman (CAO) initiated an investigation, and published its report in early 2024. In 2023, four individuals who survived child sexual abuse by a teacher while attending one of the Bridge schools, also filed complaints with the CAO, known as Learn Capital 1-4 complaints.

After investigating the Bridge 4 case, the CAO concluded that the IFC contributed to the abuse by failing to conduct adequate due diligence and supervision to ensure that the schools were safe, even after multiple cases of abuse were brought to its attention. On the eve of the investigation report release, President Banga sent out an all-staff email saying that he was “sorry for the trauma these children experienced, committed to supporting the survivors, and determined to ensure we do better going forward.”

IFC’s [Management Action Plan](#) (MAP) in response to the investigation commits the Bank to, among other things, fund a remediation program for survivors of child sexual abuse in the counties where Bridge operated. However, roughly six months into the MAP’s implementation, we remain concerned that this process will not result in any meaningful outcomes or remedy for former pupils who experienced sexual abuse while under the care of the IFC’s former client, contrary to the stated commitment of President Banga.

In August 2024, the CAO decided to merge the Learn Capital 1-4 complaints with the ongoing Bridge 4 process. As such, the four complainants, who we represent are now considered formal complainants in the Bridge 4 case and the harm they suffered should therefore be satisfactorily addressed by the Bridge 4 MAP.

Below is a summary of concerns with the IFC’s implementation of the MAP to date. In light of these concerns, and as the formal representatives of four former pupils of Bridge that suffered sexual abuse, we strongly urge **the Board to request that IFC Management revise its Action Plan to prioritize consultation with the maximum number of Bridge survivors as is possible, and ensure that the remediation program is fit for purpose to deliver meaningful remedy.**

IFC failed to ensure sufficient involvement of Bridge survivors in the consultation process:

IFC contracted UNICEF and UNFPA to undertake a stakeholder consultation process to inform the design of the remediation program. They conducted an abbreviated consultation process that took only six weeks, with a validation workshop held on October 1 to mark the conclusion of the consultation. Only towards the conclusion of this process, as UNFPA had already compiled the majority of stakeholder feedback, did IFC/UNFPA request a meeting with the complainants. This meeting was held on November 10.

Prior to the November 10 meeting with the complainants, no effort was made to consult individuals *specifically harmed at Bridge schools*. UNFPA engaged local civil society organizations and service providers to mobilize survivors of sexual violence for the consultation, in counties in which Bridge operated, but there was no specific instruction or guidance provided to these mobilizers to prioritize outreach to Bridge survivors. There was also no effort made, nor time allowed, for grassroots-level awareness raising within these counties that would have increased the likelihood of reaching Bridge survivors. We repeatedly put forward requests to the IFC to determine and find appropriate ways to reach out to other Bridge survivors beyond the four complainants. These requests were repeatedly denied on grounds that any targeted outreach efforts would be deemed unethical.

Furthermore, as we note in the next section, the consultation materials and meetings themselves failed to adequately explain the reason for the consultation. There was no acknowledgement that the process is being undertaken in response to the Bride 4 case or even, in more general terms, in response to harms that arose in the private school sector, and that therefore feedback specifically from Bridge survivors or survivors of CSA in private schools would be of particular value. As such, IFC and the implementing agencies failed to create a safe space for Bridge survivors who would have wished to self-identify and provide feedback to do so.

As the formal representatives of the four complainants, our organizations made multiple requests for information, including regarding the consultation timeline and methodology, and summary notes or transcripts, as well as seeking clarity on when and how the survivors we represent could participate. None of this information was provided to us throughout the 6-week consultation process, and IFC denied our request to attend any of the consultation meetings either as participants or observers. We were similarly

excluded from the October 1 validation workshop. We understand that the CAO, which has a formal mandate to monitor this process, was also excluded.

Following the merger of the Learn Capital 1-4 complaints with the Bridge 4 case in August 2024, as the UNICEF/UNFPA consultations were reaching closure, the IFC and UNFPA/UNICEF began to make efforts to consult with the survivors we represent. A consultation meeting was held with the complainants on November 10. While this is a positive development, we fear that this belated action will be a case of ‘too little too late.’ A truly survivor centered and trauma informed approach would have prioritized seeking the input of Bridge survivors—including but not limited to the complainants—from the very outset, as the primary stakeholders. We raised this issue repeatedly with the IFC team and it is concerning that this was not done.

The formation of the Advisory Committee further illustrates our concern: We understand that the IFC has assembled an Advisory Committee to advise on the design and implementation of the remediation program, but the members of that committee have so far not been disclosed to us. We question whether any of the committee members have direct contact with Bridge survivors, or close relationships within the community that this program is intended to benefit.

The planned remediation program is not being designed to deliver remedy to Bridge survivors:

We believe there is a high likelihood that the remediation program will not provide meaningful outcomes for children who experienced sexual abuse while in the care of Bridge schools.

Firstly, and as already mentioned, UNFPA and UNICEF throughout the consultations did not provide the case context and motivation for the consultation, namely that this is a remediation program in response to an accountability process involving Bridge schools, and that the program is intended to address the remedy needs of specific subset of stakeholders. To any participant without prior knowledge of the Bridge 4 case, it would appear as though the World Bank decided to undertake a GBV-related community development program completely out of the blue. This left participants with insufficient context to make informed comments and recommendations during the consultation meetings.

Instead, the consultation meetings focused on gathering information on how to improve the child sexual abuse prevention and response ecosystem in Kenya at a very broad level, with the aim of mapping out what root causes, challenges and opportunities exist.

This high-level information is already well documented in the public domain. While we appreciate any intentions to address sector level challenges, the approach taken here raises concerns around the overall cost, performative nature, and value of this exercise, where the resources expended could have been more meaningfully spent on a tailored intervention responding to the needs of Bridge survivors. Short of tailoring the consultation and response to the Bridge case specifically, the scope of the consultation could have at least been limited to focus on the relevant context: response and prevention of child sexual abuse within private schools.

The complainants we represent have clearly communicated their remedial wishes to the IFC and Board (see Annex 1) and there has been no meaningful discussion with the IFC to date on how the proposed remediation program can meet those demands. In a July 2024 meeting, IFC staff stated that they “hope that Bridge survivors will be encouraged to access the services that would eventually be provided through this program,” but they are not applying themselves to ensure that this will occur.

The IFC staff overseeing the Bridge 4 MAP implementation is conflicted:

We are deeply concerned by the involvement of conflicted IFC staff members in overseeing the design and implementation of the Bridge 4 MAP.

One individual previously served as an advisor to a member of the World Bank Board of Directors, and during that time was a staunch opponent of compensation and other forms of remedy for Bridge survivors and actively opposed efforts at the Board to include these measures in the Bridge 4 MAP. The individual, having moved from their Board advisory role to the IFC, now has responsibilities that include overseeing the remediation program design and overall Bridge 4 MAP implementation process. This represents a significant conflict of interest and, as such, this individual should be recused from all work on the Bridge case.

All conflicts of interest should be explored and addressed, including conflicts introduced by persons who were previously involved in managing or overseeing the Bridge/New Globe investment and who should also be excluded from the current design of the remediation program.

CAO decision to merge Learn Capital complaints with Bridge 4 case deprived the survivors of a thorough and survivor-centered approach to handling their specific cases:

In August 2024, the CAO decided to merge the Learn Capital 1-4 Complaints with the ongoing Bridge-04 process. As such, the survivors we now represent are formal complainants in the Bridge 4 case. Prior to the merger, the survivors were excluded from any opportunity to influence the scope and proposals within the Bridge 4 MAP while it was being negotiated at the Board level, despite requests to IFC and the Board.

The decision by CAO to merge the cases was against the wishes of the survivors, who felt that a new investigation, or a deferral of their cases pending the outcome of Bridge 4, would have provided them with a greater opportunity for remedy and justice.

Given that the survivors were excluded during the Bridge 4 MAP negotiation between IFC and the Board, the decision to merge at this point in the process has therefore forced the survivors into a process that is not designed to prioritize and center their voices. We strongly denounce the decision by CAO to merge the cases, depriving the survivors of a thorough and survivor-centered approach to handling their specific cases.

Recommendations:

- The Board should request that IFC revise the Management Action Plan to make it fit for purpose for delivering remedy for the complainants. Namely:
 - IFC should endeavour to undertake additional consultations specifically intended to gather the views of Bridge survivors. IFC should specifically seek the views of Bridge survivors on their remedial wishes, and design a remedial program to directly respond to their reasonable demands. At a minimum, IFC should establish a special component of its broader program that prioritizes the provision of remedies for Bridge survivors, based on their specific needs.
- The Board should ensure that the consultation report submitted to them by IFC, UNFPA and UNICEF includes specific feedback from Bridge survivors, regarding their remedy needs and how they believe the remediation program could be designed and implemented to meet those specific needs.
- The Board should ensure that IFC disclose publicly the members of the Advisory Committee and its mandate, and ensure that it is holistically constituted and includes members who have direct contact with Bridge survivors, or close relationships within the community that this program is intended to benefit.

- The Board should ensure that IFC removes all staff from the Bridge MAP team who have a real or perceived conflict of interest due to their previous role and positions taken at the Board, or their past involvement in the management of the Bridge / New Globe investment.

Annex: Bridge 4 Complainant Demands and Direct Quotations

When describing their demands for IFC and the implementation process, the Bridge survivors we represent wanted you to know:

"I am the main character in this story," "The entire wishlist is my demand and I will not choose one demand over another", "My only priority now is seeing action from IFC."

"I got into this process so that I could make a difference," "I want to see change happening, I will feel so good."

"I want financial compensation for what I went through," "My experience of abuse impacted my ability to focus while I was a student at Bridge schools, which prevented me from pursuing the level of education I otherwise may have."

"The perpetrator should be made to face justice."

"I want to receive training to pursue a career in counseling so I can help other survivors of sexual abuse."

"Staff in hospitals and police stations should be responsive," "Treat me nicely without making me feel insecure and like a victim," "Survivors should be given a safe space to stay until any investigation is over that is far from home or the perpetrator."

"I want to be given capital to start a business." The complainant added that any livelihood support should extend beyond the provision of training and capital, "I want coaching and support so that I can manage the business until it is established and I can be independent." The complainants also raised the need for community awareness and spoke again about the need to ensure that the perpetrator faced justice.

These remedial demands had all been mentioned in their wish list below as was submitted to the Board on 18 January 2024.

Complainants' Wish List:

- Financial compensation for the harms experienced by survivors.
- Financial support for:
 - School fees and related expenses
 - Counselling services for all survivors and their parents or guardians
 - Skills training and related support to cover basic needs
- A space or center where all survivors can receive counselling, case support, medical screening, and mentorship; and parents of survivors can receive education, counselling and other forms of support.

- IFC should provide funds to support a legal case against the perpetrator in Kenyan courts.
 - All survivors should be provided with the resources they need to ensure their confidentiality and safety throughout the legal process (e.g. safe house).
 - IFC should serve as an observer to the case.
- Bridge should provide a public acknowledgement of and apology for the harm that it caused to pupils, and outline the actions it will take to remedy that harm.
- Bridge management should ensure that all pupils have access to counselling services when needed.
- Bridge management should have a policy that better addresses the risk of SGBV in schools, including by strengthening vetting and recruitment of teachers and stricter repercussions for staff implicated in SGBV.
- All teachers at Bridge schools should receive training on child safeguarding and SGBV. The training should be: Continuous; updated to ensure that legal or policy developments are regularly integrated in the training; Compulsory for all Bridge staff in all schools.
- Bridge should ensure that all parents of pupils receive regular sensitization on child safeguarding and SGBV issues.
- The World Bank Board should communicate to the Kenyan government about:
 - Strengthening enforcement of regulation of private schools, particularly related to child safeguarding.
 - Strengthening and improving the handling of SGBV cases at police stations
 - Educating and sensitizing communities on SGBV, including addressing and eradicating stigma against survivors of SGBV.