



Keeping Pupils Safe in Kenya

A Review and Assessment
of Child Safeguarding in Kenya

August 2020



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Since the opening of the first academy in Mukuru Kwa Njenga in 2009, more than a million pupils in pre-primary and primary school have been educated by Bridge International Academies. Bridge has taken the responsibility of safeguarding the children in its care very seriously, and has had tough child safeguarding standards since its founding.

Bridge is committed to ensuring that every child has access to a high quality education, in a safe environment. Protecting children from sexual abuse perpetrated by teachers is a core part of this overarching commitment, which is supported by strict company policies, procedures, and practices to protect children from abuse. Bridge in Kenya carried out its first organisation-wide review of its existing child safeguarding processes in 2016-2017, which resulted in the establishment of the Critical Incidence Advisory Unit (CIAU) to provide advice & support to academies on sexual assault allegations, compile incident reports, and ensure implementation of policies. In 2018-2019, Bridge carried out an ambitious undertaking to update the company's previous Sexual Offences Policy to the new Child Protection Policy, under the guidance of legal & child protection experts.

As part of a larger strategic program to review all programming with a focus on gender and child empowerment in 2020, Bridge commissioned a study by Tunza Child Safeguarding to evaluate the impact of their programming on reducing sexual violence perpetrated by teachers against children in its schools, and to further review the fidelity of their implementation of their policies in practice. Tunza also assessed Bridge against both the local standards and internationally recognised Keeping Children Safe (KCS) Standards that are recommended by DFID, Save the Children, and UNICEF. This report is the output from Tunza's assessment and makes recommendations not just to help Bridge improve its safeguarding efforts, but also for Bridge to share the results from this review more broadly, so that it can be referenced as best practice by the government in prevention and response to child abuse in primary schools.




 <p>Comparative incidence rates</p> <p>Incidence rates of sexual abuse by teachers are significantly lower in Bridge schools compared to government schools. The ratios of the rates in government schools to Bridge range from 758:1 to 35:1 depending on the gender, age/grade, and category of abuse.</p>	 <p>Bridge benchmarked against the four tough international Keeping Children Safe Standards</p> <ol style="list-style-type: none"> 1. Policy = 71% 'In Place' & 12% 'Partly done' 2. People = 92% 'In Place' & 8% 'Partly done' 3. Procedures = 100% 'In Place' 4. Accountability = 100% 'In Place' 	 <p>Key recommendations</p> <ul style="list-style-type: none"> - Create child-friendly versions of the child protection policy e.g posters - Introduce child-friendly reporting mechanisms, supported by designated Guidance & Counselling teachers - At the police, involve Gender Focal Point Officers so that authorities commit to logging incidents & pursuing perpetrators -Strengthen partnerships that can provide expert survivor support for victims - Share best practices publicly such as the CIAU, Customer Care toll free lines & the issue tracking system
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Definitions

Child protection - According to [UNICEF](#), child protection is a subcategory 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.

Child safeguarding - According to [UNICEF](#), this refers to all of the actions a company takes to keep all children they come into contact with safe – and includes the proactive measures put in place 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.

Incidence rate - Incidence refers to the occurrence of new cases of disease, injury, or other medical conditions over a specified time period, typically calculated as a rate or proportion ([britannica.com](#)). Specifically in this review, it refers to, over a 12 month period, what percentage of pupils have ever been abused by a teacher.

Prevalence rate - Prevalence refers to the proportion of a population with a disease or a particular condition at a specific point in time (point prevalence) or over a specified period of time (period prevalence). Prevalence is often confused with incidence, which is concerned only with the measure of new cases in a population over a given interval of time ([britannica.com](#)). Specifically in this review, it refers to, at a single point in time, what percentage of pupils have ever been abused in their lifetime.

Sexual Abuse -

Child Abuse - According to the [Children Act](#), “child abuse” includes physical, sexual, psychological and mental injury

Sexual Harassment - According to the [Sexual Offences Act](#), ‘any person, who being in a position of authority, or holding a public office, who persistently makes any sexual advances or requests which he or she knows, or has reasonable grounds to know, are unwelcome, is guilty of the offence of sexual harassment and shall be liable to imprisonment for a term of not less than three years or to a fine of not less than one hundred thousand shillings or to both’.

Indecent Act - This is non-penetrative. The [Sexual Offences Act](#) describes this as an unlawful intentional act which causes (a) any contact between any part of the body of a person with the genital organs, breasts or buttocks of another, but does not include an act that causes penetration. (b) exposure or display of any pornographic material to any person against his or her will’. Any person who commits an indecent act with a child is guilty of the offence of

committing an indecent act with a child and is liable upon conviction to imprisonment for a term of not less than ten years.

Attempted Defilement - This is non-penetrative. According to the [Sexual Offences Act](#), a person who attempts to commit an act which would cause penetration with a child is guilty of an offence termed attempted defilement. A person who commits an offence of attempted defilement with a child is liable upon conviction to imprisonment for a term of not less than ten years.

Sugar Daddy Defilement - This is penetrative and is a type of defilement where there is perceived consent of the child as part of perceived consensual relationship or transactional relationship, yet where victim is under 18 and so is still statutory defilement. This definition is used in some of the literature and by Bridge although it is not used in the Sexual Offences Act.

Defilement - According to the [Sexual Offences Act](#), a person who commits an act which causes penetration with a child is guilty of an offence termed defilement. The punishment for defilement varies by age of the victim: imprisonment for life (<11 year olds); imprisonment for not less than 20 years (12-15 year olds); imprisonment for not less than 15 years (16-18 year olds). Bridge classifies oral/vaginal/anal penetration with a penis/hand/any object as defilement.

1 - Introduction

The [United Nations Convention on the Rights of a Child \(UNCRC\)](#) stipulates the four principles that contribute to the general attitudes towards children and their rights including non- discrimination, best interest of the child, the right to survival and development and views of the child. Neglect, physical, emotional and sexual abuse of children are impediments to these rights, and have adverse effects on their physical and psychosocial well-being.

The extent of sexual abuse perpetrated by teachers in Kenya

In Kenya, schools can become unsafe places where pupils become victims of sexual abuse, and in a number of instances, teachers have been cited as the perpetrators. In 2009, the Teacher Service Commission (TSC) which registers and manages government teachers reported that up to 12,660 girls were sexually abused by teachers over a five-year period but only 633 teachers were charged with sexual abuse in the same period, and that most cases went unreported. Records at the TSC were not clear on the number of school girls abused but the report said that in some cases, teachers abused as many as 20 girls in a single school before they were reported ([Daily Nation, 2009](#); [NewsTrust](#)). In 2019, the TSC reported that it had terminated 1228 primary and secondary school teachers in the previous seven years because of having sex with learners ([Daily Nation, 2019](#)). The TSC admitted that many more cases go unreported because some cultures engender early marriages, while parents accept hush money from teachers or other school workers. Numerous researchers have looked at sexual abuse of learners by teachers in Kenya and identified different types of abuse perpetrated by teachers including demanding transactional sex in exchange for basic necessities ([Parkes & Heslop, 2011](#); [Ruto, 2009](#); [Nguunzi, 2014](#)), inappropriate touching ([Ruto, 2009](#); [Odoro, 2012](#); [Barasa et al., 2013](#)), and rape ([Barasa et al., 2013](#)). A study by [Nguunzi \(2014\)](#) on the crisis of sexual abuse of school children by teachers in Kenya interviewed 500 students of whom 57.6% perceived sexual abuse by teachers in Makueni county as 'high', while only 10.2% perceived it as 'low'. This is supported by a study by [Ruto \(2009\)](#) where children were asked whether they knew of a student in a sexual relationship with a teacher and 21% of respondents claimed to know of a girl who was engaging in sex with the teacher.

With regard to actions taken when abuse by teachers arose, [Nguunzi \(2014\)](#) reported that only 10% of sexual abuse cases are being reported to the TSC, and even among those reported, just 70% of the teachers were either dismissed or retired in the public interest - the rest (30% of those reported) were recycled back into the system by TSC without any form of alerts to their new institutions. In-depth interviews by [Nguunzi \(2014\)](#) with TSC officials also demonstrated that there was a lack of consistency in the way the TSC disciplinary panel handled cases. When [Ruto](#)

(2009) asked children if they know of a teacher who had made a school girl pregnant, 26.2% affirmed, those that affirmed reported the following repercussions for the teacher: nothing (32%); sacked (25%); arrested (22%), transferred (10%); punished (5%), suspended for a while (3%), demoted (2%), married the girl (1%). Sadly, when Ruto (2009) asked what had happened to the impregnated girl, the results were as follows: dropped out of school (76%), got married (12%), did an abortion (6%), died (4%), committed suicide (1%), still in school (1%). The impact of sexual abuse, is overwhelming negative for the girl, and yet teachers that make girls pregnant are hardly receiving due punishment from the TSC.

About this study

Studies across multiple high, middle & low income countries have shown a strong correlation between poverty and child abuse (WHO, 2002). The rates of child abuse are higher in communities such as those in which Bridge operates which are characterised by high levels of unemployment, poverty, high levels of population turnover and overcrowding. This association of poverty and abuse is captured by the numerous literature sources where children are abused and are forced to remain silent in exchange for basic necessities such as food (Parkes & Heslop, 2011; Ruto, 2009; Nguunzi, 2014). This affects not just the girls, but boys too, as captured by Opati(2012) who reported that relationships between teachers and students sometimes occurred under threat or on the promise of money or basic necessities.

As part of a larger strategic program to review all programming with a focus on gender and child empowerment in 2020, Bridge commissioned a study to evaluate the impact of their programming on reducing sexual violence perpetrated by teachers against children in its schools, and to further review the fidelity of their implementation of their policies in practice. To understand the extent of sexual violence against children at Bridge as compared to government primary schools, a benchmark study on the incidence rates of sexual abuse was carried out. In addition, a review of Bridge policies and procedures was conducted to evaluate implementation of and effectiveness of child safeguarding interventions. The strong correlation between poverty and abuse must be a concern for all education providers working with children in low income communities such as Bridge. Bridge leadership reported that they regarded their schools as enclaves of safety against child abuse, and so safeguarding pupils from sexual abuse, especially by those in authority in the academies, is core to the organisation's mission.

This study had 4 goals, namely: 1) establish benchmark incidence rates of sexual abuse by teachers in government schools, and providing comparison with Bridge; 2) provide a review and analysis of the academies' policies, procedures, prevention and reporting regarding child protection; 3) review and analyse how child protection is implemented within Bridge support office and schools; and finally, 4) provide recommendations and areas of improvement of the academies' policies, procedures, implementation and/or organizational capacity. The geographical scope for review is

Kenya. External data collection was carried out through review of published studies data from academic, government, and non-government sources completed on child sexual abuse in government primary schools and Kenya - in total, we reviewed over 50 publications & external data sets, and where there were gaps, we interviewed external contacts such as officers at the TSC. Within Bridge, we reviewed internal records, data, reports and tracking related to alleged child sexual abuse incidences in Bridge schools. We also interviewed over 15 staff members across various levels of management, academy staff and parents as shown in Appendix II.

2 – Benchmark Incidence Rate of Abuse by Teachers

In this section, we provide the results from the review of multiple literature sources that we used to determine incidence rates. Sub-section 2.1 presents the incidence rates for girls, Sub-section 2.2 presents the incidence rates for boys. We chose to distinguish incidence rates by gender to align with the majority of the literature sources we reviewed, which predominantly reported incidence rates by gender. The overall goal of this exercise was to determine the incidence rate for sexual abuse perpetrated by teachers employed in government schools, and all the literature sources we used for the benchmarking exercise were from studies in low income communities that are comparable to those in which Bridge operates. We reviewed multiple publications in search of incidence rates of indecent acts, attempted defilement (non-penetrative), sugar daddy defilement (perceived consensual sexual relationship in the mind of the pupil), and defilement (rape). These are the 4 categories that Bridge uses to distinguish the cases of sexual abuse of pupils by teachers.

We had to make some assumptions to arrive at incidences rate due to the limitations in the literature covering child sexual abuse in Kenya. Firstly, we found that there is no publicly available reporting data of incidence rates of sexual abuse by teachers in government schools. The government has a [Child Protection Information Management System](#) (CPIMS) managed by the Ministry of Labour and Social Protection. The CPIMS provides a dashboard of all child abuses, and we found that it tracked sexual abuse under at least 7 categories including ‘sexual assault’, ‘sexual exploitation and abuse’, ‘sodomy’, ‘incest’, ‘defilement’, ‘child pregnancy’, ‘child marriage’. Unfortunately, it appears to only get data from 30 statutory institutions that include remand homes; rescue homes; rehabilitation schools; and assessment & placement centres. The system does not track data directly from the TSC, government schools nor from police services. It also does not track categories of perpetrators of abuse and so can’t be used to determine the incidence rate of sexual abuse by teachers.

The methodology we adopted was therefore to find reliable academic research studies carried out in government schools within communities similar to those the Bridge operates such as the slums in Kenya. The second key challenge we faced was that in the literature, the focus is often prevalence rates over a lifetime, focuses on undefined sexual abuse or certain subsets of sexual abuse, and does not focus on the perpetrator of the abuse. The lack of attention to these details in the research highlights the lack of applied work, that is actively trying to identify perpetrators, and areas of risk, so as to generate policy or programming insight for action. Consequently, we can only provide a subset of the incidence or prevalence rates of the legally defined categories of abuse, committed by teachers against pupils. To complete the benchmarking exercise for all abuse categories, we needed to make

some key assumptions, which are summarised below. Throughout this report, these assumptions are indicated alongside any incidence rate they were used to determine.

- Key assumption 1: Many literature sources report prevalence rather than incidence rates. For incidence rates that could not be found, the prevalence rate was multiplied by an adjustment factor of 73.4% to get an incidence rate. This adjustment factor was determined from papers where both incidence and prevalence rates were reported ([Appendix III](#)). An incidence rate is based on abuse over a 12 month period while a prevalence rate is based on abuse over a lifetime. Where no incidence rate (a school year, or past 12 months, for example) was found in the literature, we have multiplied the prevalence we could find by an adjustment factor of 73.4%, and have noted this adjustment.
- Key assumption 2: We assumed that reports of abuse committed by "instructors" or "authority figures" could be used as proxies for abuse by teachers. The majority of the literature sources we found reported the incidence and or prevalence of abuse among school children by all potential abusers, without necessarily focusing on abuse by teachers. To determine accurate benchmarks, it was necessary to separate the incidence rate for abuse by teachers from that of all other abusers. In papers where we could not find specific references to teachers as abusers, we inferred the rate of abuse by teachers from abuse rates of categories under which teachers might fall such as 'authority figures' and 'instructors'.
- Key assumption 3: While the methodology of generating prevalence or incidence rates in the academic literature varies, in almost all cases this was done by written surveys of pupils. This method has its own risks of under and over reporting, but does seek to establish the rate of abuse direct from child self-reporting to an academic, where there is no connection to the school or police. The incidence rates from Bridge are taken from actual reporting of incidents to parents/guardians, school staff, support staff, or directly to the Customer Care telephone line. Given the robust culture of reporting and response at Bridge, it is likely that the majority of sexual abuse incidents are reported. Even if Bridge were to have *reported* incident rates similar to TSC/government schools, actual incidents at government schools would still be *orders of magnitude* greater than at Bridge.¹

¹ Multiple studies point to very low reporting of sexual abuse incidents in government schools, due to reprisals and retaliations against reporting teachers and students, lack of follow through from TSC, and TSC keeping 30% of teachers found culpable employed. 10% of incidents are estimated to be reported to TSC. Given the documented culture of reporting and response at Bridge, we feel that reporting rates are likely much closer to incident rates, and so are using this for comparison, noting that it is an assumption. In the future Bridge should consider conducting a sample survey of pupils to confirm correlation of incident and reporting rates.

2.1 Abuse of girls by teachers

Table 1 summarises the incidence rate of abuse of girls across the 4 abuse categories (indecent acts, attempted defilement, sugar daddy defilement, defilement), and compares the incidence rates seen in Bridge Kenya to incidence rates found in various literature sources. The last column of the table shows a ratio of the government school rate to the rate at Bridge for either the same grade or the same age range. For example, among girls, we averaged the 2 ratios of the incidence rate of indecent acts in government schools based on literature and found it to be 758:1 compared to Bridge. This means that in a single year, for a government school with the same population size as Bridge, there would be 758 victims for each victim at a Bridge school in these grades. The comparatively low incidence rates at Bridge are seen for both sexes, across all abuse categories, and all grades.

2.1.1 Benchmark incidence rate of indecent acts perpetrated by teachers against girls

11.8% (adjusted incidence rate): [Ruto \(2009\)](#) of Kenyatta University includes a cross sectional study carried out at Kenyatta University across 10 districts across Kenya. The total number of respondents in the study were 1749 children (1171 girls and 578 boys), aged 10 - 18 years, from 52 primary and 18 secondary schools. Ruto (2009) found that 16.1% of girls affirmed they had been propositioned by teachers. These propositions came in form of verbal requests, letter writing, in kind through being offered a present, through gesturing and through a friend. To determine the

incidence rate, we multiplied the prevalence rate of 16.1% by the adjustment factor of 73.4% (= 16.1% x 73.4%).

27.8% (incidence rate): Parkes & Heslop (2011) studied girls aged 8-17 years, all in primary school. Some girls experienced peeping, touching, comments: reported teachers as having been the perpetrator of their most recent incident were 27.8% (peeping), 21.0% (touching), 12.1% (comments). We assumed that the most recent indecent act was perpetrated in the previous 12 months in order to equate it to an incidence rate. Since there was likely overlap between victims of peeping, touching, or comments, and all such actions are classed as indecent acts, we used the most frequent indecent act -- peeping -- to determine the incidence rate as 27.8%.

Using 2013-2019 data from Bridge Kenya of sexual abuse of pupils by academy staff including teachers, academy managers, and groundskeepers, we calculated the incidence rate of indecent acts against girls aged 8 - 17 years ie Grade 2+ to compare with Parkes & Heslop (2011), and indecent acts against girls aged 10-18 years ie Grade 4+ to compare with Ruto (2009). We made sure to benchmark the incidence rates of abuse in the same grades, or of children in the same age group as the literature. We then calculated the average ratio of the incidence rates at other schools to incidence rates at Bridge, to obtain the benchmark of 758:1. For every 758 girls abused by a teacher in other schools, 1 girl would suffer abuse at Bridge.

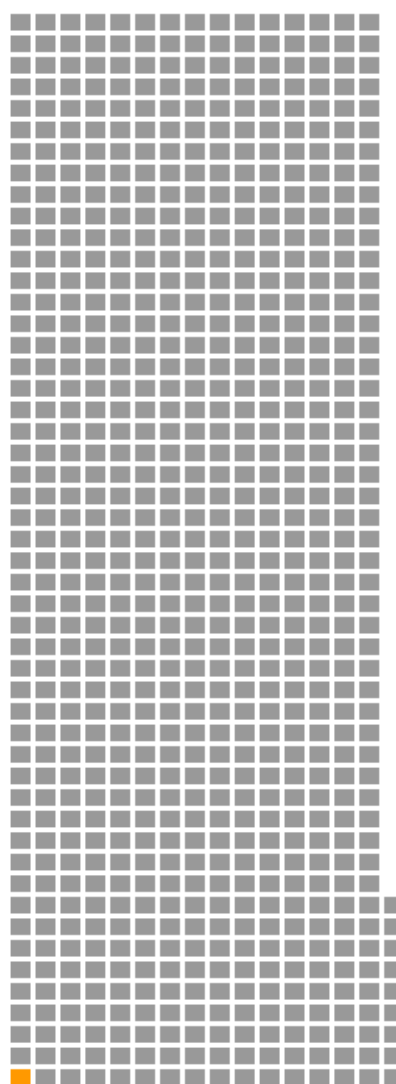
Indecent Acts, Girls

Rate of sexual abuse of girls by teachers
Ratio of Gov't School to Bridge

758:1

Gov't

Bridge



2.1.2 Benchmark incidence rate of attempted defilement of girls by teachers

0.2394% (incidence rate): After review of more than 50 significant research papers on sexual abuse of school age children in Kenya, and many focused on teacher-led abuse directly, we are most concerned that attempted defilement is not considered a serious type of abuse as compared to defilement. A possible reason for the lack of focus on attempted defilement in the literature, and by the TSC, comes from respondents in a study by Ngunnzi (2014) where girls and teachers considered only penile penetration as sexual abuse, and is a stark illustration of the missed

opportunity for schools to better safeguard children by also tracking & addressing attempted abuse incidents. According to the Population Council (2018), among 456 Kenyan children in primary school screened, the rate of attempted rape was 22%, but there was no segmentation by perpetrator. As a possible estimate for framing but without the necessary rigour for credibility as a benchmark, we looked to the data by Biaocchi et al. (2009) who reported that among Class 6 girls in primary school, 11% reported a sexual assault in the past year, and 6.3% of those cited at least one *attempted* rape. The paper found that with the same population of girls, of those raped, 3.8% cited an “authority figure” as the perpetrator. If this same rate were applied to the girls who cited an attempted rape, it would set a benchmark for attempted defilement of girls by teachers as 0.2394%.

Using 2013-2019 data from Bridge Kenya of sexual abuse of pupils by academy staff including teachers, academy managers, and groundskeepers, we calculated the incidence rate of attempted defilement in Grade 6 to compare with Biaocchi et al. (2019). We wanted to make sure that we benchmarked the incidence rates of abuse in the same grade, and we then calculated the average ratio of the incidence rate at other schools to the incidence rate at Bridge, to obtain the benchmark of 35:1. For every 35 girls abused by a teacher in other schools, 1 girl would suffer abuse at Bridge.

Attempted defilement, Girls
Rate of sexual abuse of girls by teachers
Ratio of Gov't School to Bridge

35:1

■ Gov't ■ Bridge



2.1.3 Benchmark incidence rate of sugar daddy defilement of girls by teachers

2.0532% (adjusted incidence rate): The Ruto (2009) study at Kenyatta University indicated a prevalence rate of 16.1% of girls aged 10 - 18 years affirmed they had been propositioned by teachers; To determine the incidence rate, we multiplied the prevalence rate of 16.1% by [the adjustment factor of 73.4%](#), generating an indecent act incident rate of 11.8%. While the majority of girls either declined the “love proposals” or ignored them, 17.4% yielded to the love proposal and entered into a

relationship with the teacher. Therefore we estimated the incidence rate of sugar daddy defilement perpetrated by teachers as $11.8\% \times 17.4\% = 2.0532\%$.

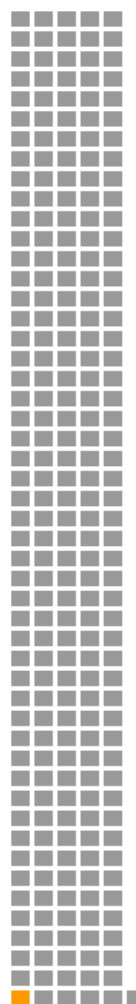
3.1% (incidence rate): Parkes & Heslop (2011) studied children aged 8-17 years found that for sex for goods, 3.1% of the girls reported a teacher as having been the perpetrator of their most recent incident. We assumed that the most recent indecent act was perpetrated in the previous 12 months in order to equate it to an incidence rate.

Using 2013-2019 data from Bridge Kenya of sexual abuse of pupils by academy staff including teachers, academy managers, and groundskeepers, we calculated the incidence rate of sugar daddy defilement of girls aged 8 - 17 years ie Grade 2+ to compare with Ruto(2009), and sugar daddy defilement of girls aged 10-18 years ie Grade 4+ to compare with Parkes & Heslop (2011). We wanted to make sure that we benchmarked the incidence rates of abuse in the same grades, or of children in the same age group as the literature. We then calculated the average ratio of the incidence rates at other schools to incidence rates at Bridge, to obtain the benchmark of 251:1. For every 251 girls abused by a teacher in other schools, 1 girl would suffer abuse at Bridge.

Sugar daddy defilement, Girls
Rate of sexual abuse of girls by teachers
Ratio of Gov't School to Bridge

251:1

■ Gov't ■ Bridge



2.1.4 Benchmark incidence rate of defilement of girls by teachers

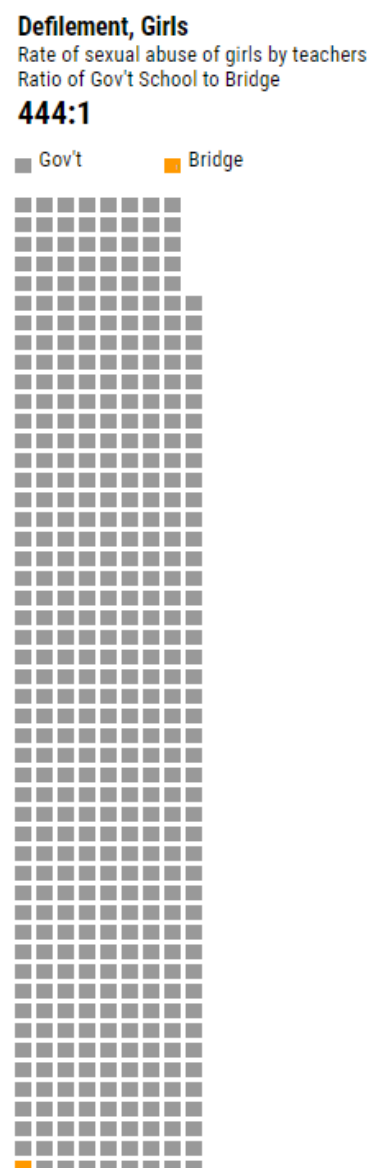
0.274% (incidence rate): Baiocchi *et al.* (2019) collected baseline data prior to an intervention in 6 slums in Nairobi including Dandora, Huruma, Kibera, Korogocho, Kariobangi, and Mukuru. 4125 girls aged 10-14 years, all in grade 6, in 95 Primary schools were involved. Before the intervention, 7.2% of girls reported having been raped in the past year, and of those, 3.8% named “an authority figure” as the perpetrator. Rape was defined as being forced to have sex against ones will, whether that force was physical, threats or intimidation, or coercion. We took 3.8% of

7.2%, generating a benchmark 0.274%. We assumed that all authority figures are teachers, which is likely an overestimation of abuse by teachers.

0.32% (incidence rate): In a study by the same authors, but with different children studied, Baiocchi *et al.* (2017) collected baseline data prior to another intervention in informal settlements of Nairobi. Rape was defined as penetration with a penis or another object. We relied on data from the control group which did not undergo any intervention i.e 2,827 girls aged 10-16 in primary school grades 5 - 8 from 16 schools. The incidence rate (annualized rape rate) was found to be 6.4%, and when the girls were asked who had forced them into sex, 5% reported that they had been raped by an authority figure. We assumed that all authority figures are teachers, which is likely an overestimation of the abuse by teachers. The incidence rate was calculated as follows: $6.4\% \times 5\% = 0.32\%$

3.1% (incidence rate): [Parkes & Heslop \(2011\)](#) studied girls aged 8-17 years. Some girls experienced forced sex, 3.1% of all girls reported a teacher as having been the perpetrator of their most recent incident. We assumed that the most recent indecent act was perpetrated in the previous 12 months in order to equate it to an incidence rate.

Using 2013-2019 data from Bridge Kenya of sexual abuse of pupils by academy staff including teachers, academy managers, and groundskeepers, we calculated the incidence rate of defilement of girls to make sure that we benchmarked the abuse of pupils of the same age group or in the same grade as the literature. We then calculated the average ratio of the incidence rates at other schools to incidence rates at Bridge, to obtain the benchmark of 444:1. For every 444 girls abused by a teacher in other schools, 1 girl would suffer abuse at Bridge.



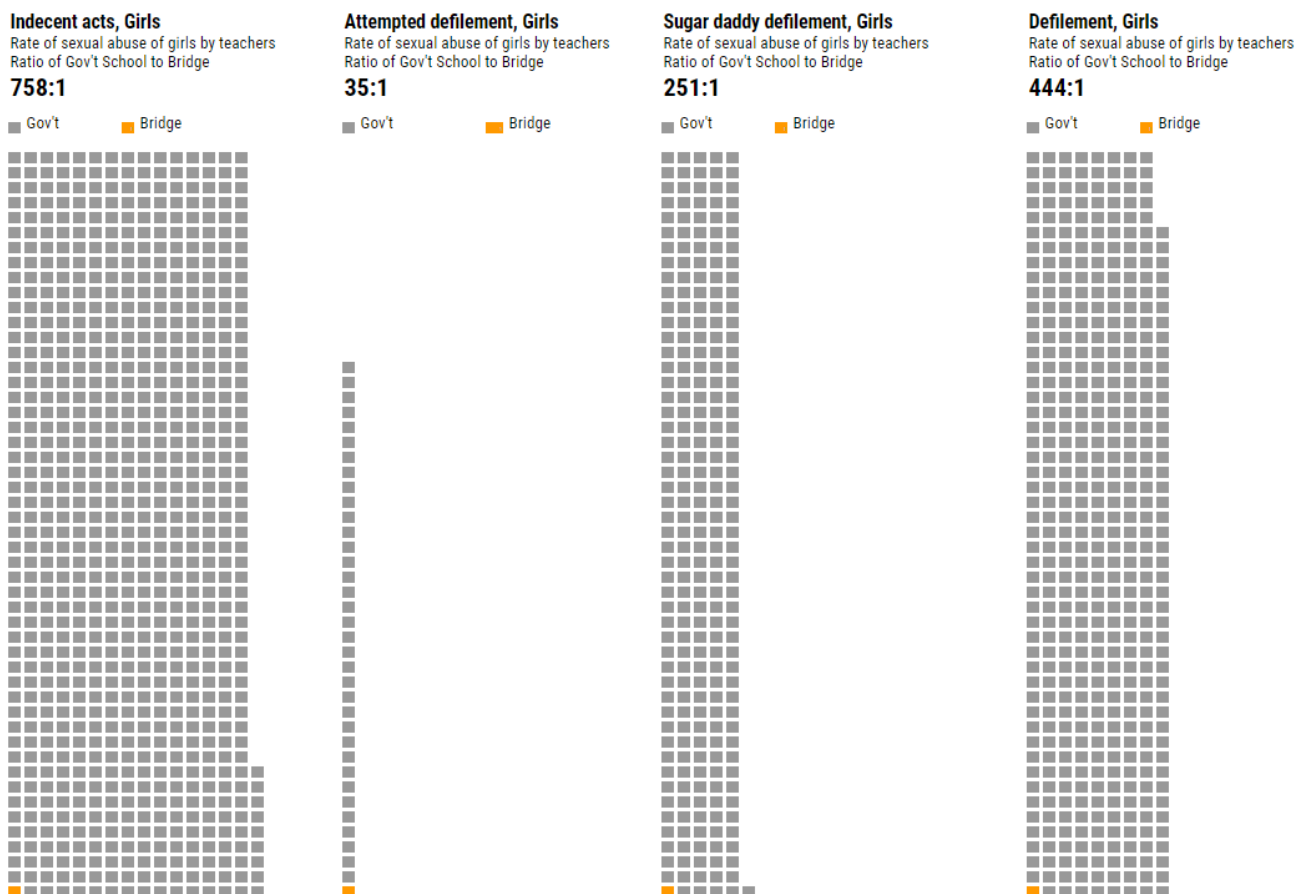


Table 1: Benchmarks for Sexual Abuse of Primary School Girls by Teachers in Government Schools and Bridge Kenya (2013-2019) Comparison

SEXUAL ABUSE OF GIRLS BY CATEGORY	GOV'T SCHOOLS	BRIDGE	RATIO OF GOV'T TO BRIDGE
INDECENT ACTS			
Indecent acts, 8-17 years	27.8% ²	0.0235%	1184:1
Indecent acts, 10-18 years	11.8% ¹	0.0354%	333:1
Indecent acts, Average			758:1 (average ratio)
ATTEMPTED DEFILEMENT			
Attempted defilement, Grade 6 only	0.2934%³	0.00839%	35:1

SUGAR DADDY DEFILEMENT			
Sugar daddy defilement, 8-17 years	3.1% ²	0.00877%	353:1
Sugar daddy defilement, 10-18 years	2.0532% ¹	0.0139%	148:1
Sugar daddy defilement, Average			251:1 (average ratio)
DEFILEMENT			
Defilement, Grade 5 - 8	0.32% ⁴	0.00305%	105:1
Defilement, Grade 6 only	0.274% ³	0.00210%	131:1
Defilement, 8-17 years	3.1% ²	0.00283%	1095:1
Defilement, Average			444:1 (average ratio)

1: Adjusted incidence rate from S.Ruto (2009) for 10 -18 year olds in 52 primary and 18 secondary schools ie Grade 4+

2: Incidence rate from Parkes & Heslop (2011) for 8-17 year olds in primary schools ie Grade 2+

3: Adjusted incidence rate for Baiocchi et al. (2019) for Grade 6 only

4: Incidence rate from Baiocchi et al. (2017) for Grade 5-8 girls in the control group

2.2 Abuse of boys by teachers

We could not determine a reliable benchmark for the sexual abuse of boys by teachers. We found that sexual abuse is primarily studied as a form of gender-based violence (GBV) for which the victims are predominantly female. Baiocchi *et al.* (2019) did not report any data on boys. Baiocchi *et al.* (2017) studied an intervention to prevent sexual assault in informal settlements, but while the girls' program had components of empowerment, gender relations, and self-defense, the boys' program promoted healthy gender attitudes towards girls, with the goal being to lower the rate of assault of just the girls so outcomes were only measured on the girls in the study. Ruto (2009) was also primarily concerned with sexual subjugation of girls by boys. Boys are not being studied as much as girls and often, when they are studied, they are studied as aggressors rather than as victims. According to The Violence Against Children Report (2019), traditional norms and beliefs such as boys cannot get raped and if it happens it is shameful. Feelings that they should not report about gender, sexuality and violence, contributed to boys not disclosing about defilement or seeking services. The Violence Against Children Report (2010) reported that social stigma, macho stereotypes and homophobia all contributed towards boys being less likely to report abuse.

The only study we found that was solely focused on the abuse of boys was a Masters Thesis by [Odoro \(2016\)](#) who studied 300 boys aged 10-18 years, in Class 4-8, in 4 government primary schools in Mukuru Kwa Njenga and found that 75.3% of the pupils had been exposed to sexual abuse or sexually abused another person in one form or another over their lifetimes. We had numerous concerns about the reliability of the data presented because to determine the rate of abuse, the survey asked the boys 'Did an adult or older relative, family friend or stranger ever force or allow you to fondle him/ or her?'. Asked this way, the question creates a dataset where it is impossible to know what percentage of the 75.3% of boys who were involved in sexual abuse were victims, and what percentage were perpetrators. Ruto (2009) found that 55% of all boys had experienced sexual harassment, 38.6% of all boys had received love proposals from adults, 21% of all boys had accepted love proposals from adults, 29.1% of all boys had experienced unwanted sex in their lifetimes. Ruto did not provide details of who was abusing the boys. According to the Population Council (2018), among 456 Kenyan children (both sexes) in primary school were screened, the rate of attempted rape was 22% but it was unclear what percentage of this abuse was perpetrated by teachers. [Parkes & Heslop \(2011\)](#) revealed that 5.6% of boys in Kenya reported having experienced sex for goods in their lifetimes. Unfortunately, the paper only reports data on the responses from girls on who the perpetrators against them were; as no data on perpetrators is available for boys, we could not determine what percentage of perpetrators were teachers to create a relevant benchmark.

Using 2013-2019 data from Bridge Kenya of sexual abuse of pupils by academy staff including teachers, academy managers, and groundskeepers, we calculated the incidence rate of overall sexual abuse of boys as 0.00083%, across all 4 categories. We did not find a comparable incidence rate in the literature, and so we could not calculate a ratio of incidence in government schools to Bridge.

3 – Benchmark Bridge’s safeguarding measures

3.1 Bridge’s adherence to standards set by the Kenyan government

As an education provider working with Kenyan children, Bridge must strictly adhere to the child safeguarding standards provided by the Ministry of Education, Teacher Services Commission (TSC) and other government guidelines available for the protection of the rights of children against abuse by teachers in Kenya.

3.1.1 Overview of Child Safeguarding standards in Kenyan government schools

Government Policies relevant to child safeguarding in schools: There is no stand-alone document that lays out the child protection policy & procedures specifically for Kenyan government schools to adhere to. The lack of a consolidated child protection document limits consistency, efficiency and coordination in prevention and response to child sexual abuse in schools. Nguunzi (2014 Kenyatta University), laments that efforts by organisations to work with the government have been watered down by the lack of synergy and standardised approach. Instead, government schools rely on a combination of policies, including the Kenyan Constitution, the [Sexual Offences Act](#) (which specifically defines child sexual abuse categories), the Children Act, the Gender Policy in Education (2007), and the [Education Act](#) which include numerous provisions designed to protect children from different types of abuse including physical, sexual, psychological and mental injury. More specifically the Ministry of Education provided the [Safety Standards Manual](#) which lays out common standards for child protection specific to schools. Standard No.10 in the manual is very specific to sexual abuse including how children should distinguish between appropriate and inappropriate touch, to whom children should report sexual abuse including transactional sexual abuse, advising children to avoid areas where abuse commonly happens such as bushes, and responsibilities of the School Management Committees when abuse is reported.

The Teacher Service Commission also provides policies related to appropriate conduct of teachers. The TSC Act 2012, [TSC Code of Conduct](#) stipulates disciplinary action will be taken against a teacher who gets involved in a sexual relationship with his/her student. It adds that a public officer shall not sexually harass a member of the public (including students), and provides clear definitions of sexual harassment such as making request or exerting pressure for sexual activity or favors; making intentional or careless physical contact that is sexual in nature; and making gestures, noises, jokes or comments, including innuendos. [TSC Guideline for the Recruitment of Primary school Teachers](#) outlines standards that must be met by teachers during the recruitment process, including their conduct and history during previous employment by confirming online registration status of the applicants to avoid

engaging deregistered teachers such as those that may have engaged in misconduct.

Nguunzi (2014) reported on the dissemination of these policies in government schools and found that the [Gender Policy in Education \(2007\)](#), which mandates that every learning institution a sexual-violence -free environment was largely unavailable in the institutions surveyed & all the teachers they interviewed expressed they had never heard of the policy. Furthermore, 90% of the TSC officials interviewed had scanty knowledge of the policy, while none of the pupils, civic or religious leaders were aware of its existence. The [TSC Act 2012](#) was found to trivialize sexual abuse, labeling them as immoral Conduct rather than crimes and found that under schedule 34, the Commission forbids teachers from having sexual intercourse and makes no mention of sexual abuse of children. The TSC Act, 2012 provides for reinstatement to the Teacher Register without exception, meaning that where teachers have sexually abused children and been dismissed, they would still have a right to get back their certificates and continue practice (Nguunzi, 2014). The TSC has made attempts to fill the gaps in its policy documents by releasing circulars such as [The TSC circular 03/2010 on Protection of Pupils/Students from Sexual Abuse](#) provides a more comprehensive protection of children and provides for measures towards addressing suspected cases of child sexual abuse and preventing exposure of children to sexual abuse by teachers. In the [TSC Circular 14/2018 Protection of Pupils/Students](#), the TSC directs School Managers to stop incorporating unregistered teachers and those deregistered by the commission from accompanying students/pupils for any co-curricular activities within and/or outside the school. It is however unclear whether unregistered teachers are responsible for a large portion of the abuse.

Procedures when sexual abuse arise: The TSC policies require that teachers must report to multiple levels of authority in cases of abuse, within 24 hours. According to the [TSC Circular 3 of 2010](#), “any teacher who at any given time has reasonable grounds to believe that sexual abuse has been committed against a pupil must report to the case or suspicion to the headteacher, education officials, School Management Committees, Boards of Governors, Police or any organisation working with Child Protection issues in the area **AND** the Teachers Service Commission (TSC) withing 24 hours”. The Circular defines types of sexual abuse and outlines ramifications to teachers who go against the directives, however it does not give clear direction on how schools should respond to support the survivor. We also noted that on their website, the TSC provides visible hotline numbers for teachers, parents, and other concerned parties that can be used to report sexual misconduct of fellow teachers. However, it is not clear to us whether this reporting channel is ever used to report sexual abuse or if it is publicised for this purpose. When we called the [TSC hotline numbers](#) in mid-August 2020, we found that they were all switched off. [Adhami et al. \(2017\)](#) in a study at Georgetown Law found that while most teachers know they should report sexual abuse committed by fellow teachers,

they do not report & some teachers believe that sexual abuse by a teacher “will spoil the school’s reputation” and so the cases will be “hushed up”, and not brought out in the open. In the Daily Nation (2019), the TSC admitted that many more sexual abuse cases go unreported, and Nguunzi (2014) reported that only 10% cases were reported to the teacher employer, and highlighted that the low rate of reporting abuse of teachers by teachers was because the TSC lacks a clear system for protecting witnesses. Nguunzi (2014) upon checking with the TSC and the Department of Children's Services, found that two institutions did not have clear statistics on abused children and that the TSC admitted that it had not been possible to establish the number of abused children as the vice was shrouded in secrecy and stigma causing victims to minimize disclosure. Nguunzi (2014) found that teachers were the least common person to report on their abusive colleagues, for fear of stigmatisation by fellow teachers and headteachers, leading to reprisals against them for having reported the situation. For those teachers who did report on another teacher’s possible abuse of a child, they were not only often chastised by their own school heads, but also by education officials and TSC officials, with some teacher reporters interdicted in the pretext of insubordination.

We also interviewed a TSC employed teacher who explained that they were not aware of any centralised, online tracking/ticketing system for reported cases to ensure they are easily accessible. The teacher mentioned that despite the guidelines from the TSC, teachers do not report sexual abuse cases directly to the commission but instead follow an escalating process which was not documented but was an unwritten guideline within schools: once a teacher or headteacher is aware of an abuse, the case is reported to the curriculum support officer who then escalates it to the County Director of Education. The County Director of Education thereafter reports to the TSC who schedule hearings to determine the case. Below is a summary of the reporting chain as described by the teacher.

Teacher→Head Teacher→Curriculum Support Officer→County Director of Education→TSC

It appears that the management of the case depended greatly on the ethics of the headteacher to whom the case is reported, and the headteacher was relied on to determine whether the case should be reported to the police right away, or whether the child should be taken for medical tests. This process creates four opportunities for cover-up because the report has to go through 4 individual persons before TSC is even aware, with no official record/or recording system that is available for review. Even when notified, in practice, the head-teacher at the school has full discretion for whether the alleged case is ever shared with anyone outside of the school. Given this reporting chain, if the perpetrator is the head teacher, it may be impossible for a pupil or other teacher to pursue reporting of an incident. In reviewing Bridge’s reporting mechanisms, it is clear that having, communicating, and encouraging use of direct reporting to Customer Care is important, and ensuring reporting can bypass the head teacher, as it may be that the head teacher is culpable either directly or in a cover-up.

Accountability: Penalties for child sexual abuse

Disciplinary procedures for teachers that engage in sexual abuse of pupils are included in TSC Code of Conduct - the commission investigates breaches of the conduct following a complaint by any person, or might refer the case to another body for investigation. We found that employing disciplinary measures such as suspending an alleged perpetrator are particularly difficult to implement at the school level because the head teacher can not discipline teachers without sign off from the TSC as outlined in the TSC Teachers Management professional misconduct guidelines. Given the scale of sexual abuse by teachers reported in government schools, we found very limited evidence of the TSC terminating teachers due to sexual abuse of pupils. What is available includes the TSC annual lists of teachers who are deregistered for various kinds of misconduct ([TSC Deregistered Teachers, 2017-Current](#)), and the TSC has also released data, via the [Daily Nation \(2019\)](#), on the number of teachers dismissed since 2010 for having sex with learners, which is shown in [Table 2](#).

Table 2a: TSC (Teacher Service Commission) data on teachers dismissed for sexual abuse

Year	No. of teachers employed by the TSC	No. of teachers dismissed for sexual abuse ^a
2004-2009	217, 956 average teachers per year ^{b,c}	633 ^d
2010 - 2017		1 077
2018 - May 2019		151

a: [Daily Nation \(2019\)](#)

b [Economic Survey 2018](#) (217,152) ;

c: [Economic Survey 2020](#) (218,760)

d: Adhami et al. (2017)

Table 2b: Number of reported sexual abuse cases to TSC nationally (2003 - 2007)*

2007	2006	2005	2004	2003	TOTAL
123	144	100	139	127	633

*: Ngunzi (2014) reference a TSC Report (2009)

3.1.2 Overview of Child Safeguarding Efforts at Bridge to prevent abuse by teachers

Policy & Prevention - Bridge policies related to child safeguarding against sexual abuse by teachers are housed in the Child Protection Policy, the Employee Handbook, and in the policy document of the Critical Incident and Advisory Unit (CIAU). We found that Bridge had also included the comprehensive list of guidelines provided by the Kenyan government in the Bridge Child Protection Policy including. It is mandatory that a physical copy of the Children Act is available in every Bridge academy in Kenya. In contrast, clearly defined policies are lacking in government schools, which do not have a stand-alone policy on child protection but rather rely on multiple policies. For example, the Safety Standards Manual has a section on preventing child abuse but it does not outline step-to-step procedures of actions to be taken. The TSC/Circular No.3/2010 Protection of Pupils/Students from Sexual Abuse and TSC/Circular No.14/2018 Protection of Pupils/Students are other government documents that focus on abuse in schools, however, they too lack a comprehensive detail on steps to be taken when an abuse occurs. This is evidenced in a study by [Moragwa \(2017\)](#) where interviewed teachers reported that schools did not have written reporting system when child abuse occurred, and some teachers had never even heard of reporting systems for child abuse.

An important part of prevention is the recruiting and training for academy managers and teachers. We found that Bridge carried out background checks on teachers and academy managers by requesting for valid TSC numbers & certificates which Bridge verifies on the online TSC system which prevents recruiting of teachers that may have been deregistered by the TSC for misconduct. Additional documentation required at the point of recruitment include reference letters from the local chief (for academy managers). During the interview process, we found that Bridge included child safeguarding case study interview questions during the [recruitment process for academy managers](#). As part of [onboarding and induction training](#) of all School leaders and Teachers, training is conducted on Bridge's policies relating to child protection, with a specific focus on sexual abuse. Academy managers receive refresher training during Academy Manager Summits which are run 2 times in a year, and they are required to carry out training for teachers on an as needed basis during weekly Saturday summits at the academies.

For pupils, Bridge utilises the lifeskills curriculum to teach about sexual abuse, and this is managed via [structured learning guides & lessons](#) that are monitored by the Support Office via the teacher tablets. In some academies in Nairobi, Bridge has strong partnerships such as with Medecins San Frontiers (MSF) who have visited Mukuru-based academies to run child appropriate programmes about sexual abuse.

For parents, Bridge asks that they sign a [Parent Agreement](#) (which is also referred to in the Child Protection Policy) to demonstrate their commitment to safeguarding children. Visitors to Bridge schools must also sign [Code of Conduct for Visitors](#) which

emphasizes child safeguarding. In the past, Bridge has partnered with other organisations such as Medecins Sans Frontiers (MSF/Doctors Without Borders) and Childline to provide additional intensive training for parents and to raise awareness about child sexual abuse.

Procedures: Reporting, investigations, child follow up - These procedures are outlined in the child protection policy & the CIAU policy. Reporting is an important first step in ensuring that all incidences are acted on rapidly. The policy advises that all suspected violations of the Child Protection Policy be immediately reported to Customer Care and to alert the academy manager, who is to also escalate such violations to the Support Office team at Bridge. The academy manager is not to investigate any incidents but rather to report them to the Support Office immediately by calling the toll free Customer Care line, or sending an email to Customer Care. The policy instructs teachers to report to both the school leader and to call Customer Care, which can be done anonymously, because Bridge protects those reporting via the Whistle Blowing Policy. The Customer Care number is also displayed in all academies, and shared with parents, who can report cases toll-free and anonymously.

The People Director is the Designated Child Protection Officer and is responsible for investigation of all sexual abuse allegations. When any one of the School Leader, his/her Supervisor, a whistleblower, an anonymous source or a parent of the affected child report an incident which would be a violation of this Policy, the People team shall immediately commence investigation in collaboration with the relevant stakeholders, subject to the guidance provided under this Policy and the applicable local laws. For sexual abuse (of any kind - Contact abuse or Non-contact abuse), a clear step-by-step process is included in Schedule III of the Bridge Child Protection Policy, and is followed once a suspected incident is reported to Customer Care. Most important, when a sexual abuse case is logs in the Customer Care Issue Tracking System (Mantis), it is automatically identified as a “Red Flag”, which immediately sends off email notifications to the Directors, MD, President, CEO and CIAU (Critical Incident Advisory Unit).

A critical component in the management of sexual abuse incidence at Bridge is the committee known as the Critical Incident Advisory Unit (The ‘CIAU’) which was officially established in 2016. The policy document describing the work of the CIAU can be found [here](#). The CIAU is charged with analysing sexual assault incident reports and providing support and direction. It is an interdepartmental standing committee housed at Bridge Support Office, and provides advice and support to academies on sexual assault allegations incident reports. The CIAU provides support to academies on sexual assault allegations incident reports. The CIAU predates and augments the current Bridge Child Protection Policy and was set up because Bridge deeply appreciates the scale of the social challenges of the

communities in which they serve. They felt that a multi departmental team was required to react faster and better to sexual abuse cases. The CIAU team works hand in hand with the People Department (formerly People Operations Department), i.e. the department that houses the Designated Child Protection Officer, to ensure that the steps outlined in the Child Protection Policy, [Schedule III, Scenario 1](#) are followed. Members of the CIAU have clearly outlined responsibilities related to supporting the step by step investigation process. Due to the critical nature of sexual abuse, the CIAU works with other organisations in the school's communities. These partners help ensure that pupils receive training about abuse, receive the right medical care when abused, that their guardians follow the right protocols to protect evidence, and that counselling is provided to the victim. Bridge has an extensive database of partners that Bridge works with/has worked with including Doctor without Borders/MSF and Childline Kenya. During the interviews with Bridge staff, it came out clearly that Bridge staff, specifically the Academy Manager as most senior local staff would ensure a survivor of abuse would receive immediate attention and support. For example, if a child needs urgent medical attention and his/her parent or authorised guardian is not available, then the Teacher or Academy Manager must take the child to the nearest registered medical practitioner or hospital to ensure that the child receives appropriate medical attention.

Accountability: Penalties for child sexual abuse - Alleged perpetrators reported by a verifiable source are suspended pending the outcome of an independent review that will be conducted by the People Department. According to the policy, depending on the circumstances of the case, Bridge also involves the police to ensure criminal prosecution where this is appropriate. All sexual abuse cases end in a resolution to terminate, warn, or clear the alleged perpetrator.

In all the cases where the Bridge review showed that the alleged perpetrator was likely responsible for the abuse reported, the perpetrator involved was terminated.

Table 3: Assessment of Bridge safeguarding standards against sexual abuse by teachers against government standards

	Bridge performance			
Government policy document	In place	Partly Done	Not in Place	Comments
The Ministry of Education Safety Standards Manual	❖			The manual focuses on simple prevention responsibilities that schools, parents and learners have in identification and prevention child abuse. Bridge standards on prevention and response on sexual abuse exceed those set in the manual. Unlike the Bridge Child Protection Policy, the manual is limited in scope because it does not comprehensively cover processes and procedures necessary to ensure effective reporting, response and accountability for abuse.

The TSC circular 3/2010 on Protection of Pupils/Students from Sexual Abuse	❖			This circular provides measures to address suspected cases of child sexual abuse and prevent exposure of children to sexual abuse. In comparison with the Bridge Child Protection Policy, the circular is limiting in scope and does not detail stringent procedures and guidelines needed in the prevention and response against child sexual abuse in schools. CRADLE, a legal Foundation Promoting justice for children in Kenya, reports that as much as TSC had gone an extra mile to capture all the circumstances that expose children to abuse and protection of abused children, a more comprehensive protection and policy guidelines for all schools in the form of child protection policy needs to be put in place that not only target teachers but pupils and students as well. (TSC Guidelines on Protection of Pupils/Students from Sexual Abuse: A Good Step but Not Enough, June 21, 2010. CRADLE).
TSC Circular 14/2018 Protection of Pupils/Students	❖			Bridge has strict procedures on who is allowed to access the school and interact with students. These procedures and processes exceed TSC guidelines on who is allowed to access the school and who is allowed to interact and supervise students during co curricular activities.
The teachers Service Commision Code of Conduct	❖			Bridge has a zero tolerance approach to disciplinary action against teachers who get involved in a sexual relationship with his/her student, with 100% dismissal rate.
Guideline for the Recruitment of Primary school Teachers - 2019/2020	❖			Bridge guidelines on recruitment more robust in vetting and screening teachers and exceeds set TSC set standards
Education Act (1968- Chapter 211 - Laws of Kenya, Revised 1980)	❖			The layout of Bridge schools allows for visibility of learners and teachers at all times to limit 'blindspots' where abuse might happen on the school campus. Bridge Safety guidelines meet the standards.
The Children's Act 2001	❖			The Bridge Child Protection policy provides for the protection of children and their rights as stipulated by the act and meets laid down standards on protection.

3.2 Bridge compared to tough international standards for child safeguarding

We believe that Bridge's efforts towards safeguarding pupils from sexual abuse by teachers exceed those mandated by the Kenyan government. However, given the high rates of sexual abuse of pupils by teachers, we recommend that education providers that are committed to safeguarding vulnerable children should aspire to

tougher standards. Langat (2015) emphasizes that as much as there is a code of conduct for teachers, incidences of teacher sexual abuse of students is still high. Because the previous section highlighted numerous gaps in the policies and processes set for government schools with regard to safeguarding have numerous gaps, we decided to benchmark Bridge against tough globally recognised standards for safeguarding, even though these are not mandated by the Kenyan government. Here, we adapted guidelines for internationally recognised Keeping Children Safe (KCS) Standards that are recommended by DFID, Save the Children, and UNICEF. Table 4 describes the four Keeping Children Safe Child Safeguarding Standards and how Bridge measures against them.

Table 4: Summary of Bridge benchmarked against the 4 Keeping Children Safe Standards

KCS Standard	Description	In place	Partly done	Not in place
1 - Policy	The development of a policy that describes how an organisation is committed to preventing harm to children, outlining the steps that must be taken should an incident occur.	71%	12%	17%
2- People	The identification of clear responsibilities and expectations for all staff and associates, supporting them to understand and act accordingly.	92%	8%	0%
3 - Procedures	The creation of a child-safe environment by implementing high quality safeguarding procedures that are applied in all programmes and activities.	100%	0%	0%
4 - Accountability	The regular monitoring and review of an organisation's safeguarding measures.	100%	0%	0%

3.2.1 KCS Standard 1 - Policy

All organisations whose work affects children need to develop a clear child safeguarding policy and procedures that prevents harm to children and outlines what measures are in place to respond when safeguarding concerns arise. Developing a child safeguarding policy makes it clear to everyone that children must be safeguarded and not put at risk of harm because of the organization's contact with, or impact on, children.

According to KCS Child Safeguarding Standards, this involves “the development of a policy that describes how an organisation is committed to preventing harm to children, outlining the steps that must be taken should an incident occur”.

Table 4 summarises the results of our assessment of Bridge's policies against KCS standards, which are then detailed in Appendix VIII (Table 1). We found that policies and procedures were an integral part in ensuring children attending Bridge International Academies are safe and protected against any form of abuse and neglect. The review highlights that 71% of Bridges Child Policy and Procedures are in place according to KCS standards. Bridge has a well-articulated child protection/safeguarding policy in place that provides clear guidance on what action to take if there are concerns about a child's safety or welfare. The policy is approved by the School Board and management that describes how it is committed to preventing and responding appropriately if children are harmed, or if allegations of harm to children are made. Moreover, Bridge has developed and adopted an appropriate definition of child abuse including physical, emotional, or sexual abuse, sexual exploitation, neglect and commercial exploitation and inappropriate behavior of children towards other children. The policy encompasses a whistleblowing section included as part of the child protection policy. Staff code of conduct in place and all staff sign the staff code of conduct as part of the induction pack. The School child protection policies and procedures are subject to an annual, scheduled review and revision. 12% of the standard is partially fulfilled when it comes to the availability of the Code of Conduct to all personnel, volunteers, parents, and the broader school community. The code of Conduct was only available to staff and teachers on their digital tabs.

However, 17 % of the requirement towards the standard was not in place when it came to KCS recommendations on public promotion and awareness. Discussions with 2 Academy Managers and 2 Parents (Super Mamas), revealed that policies were not easily accessible to students, parents, and community members. It emerged that the policy was also not available in the school's website and not presented in public places e.g. in form of posters in common meeting spaces, office

reception. The Policies has not been translated in child friendly version for easy comprehension by students nor translated into local languages (Kiswahili) for parents and community members who could not read English.

3.2.2 KCS Standard 2 - People

Everyone connected to Bridge should understand their role in keeping children. The standard reviews Bridge Child Protection policies and procedures based on the following statements.

Table 4 summarises the results of our assessment of Bridge's policies against KCS standards, which are then detailed in Table 2 of Appendix VIII. Based on this review 92% of Bridge roles and recruitment procedures meet the standards. Formal procedures for recruitment exist for determining the character of adults who interact with students. These procedures may include establishing whether the staff has a criminal record, background

checks or other such means as may be suitable based upon the risk posed to the students. Formal procedures exist to obtain and verify references for prospective and existing faculty and staff. From the review of Child Protection Policy and Employee handbook it was established that the school has developed and adopted a code of conduct and written guidelines for appropriate and inappropriate behavior of adults towards children and children towards other children All staff, volunteers and contractors acknowledge that they have read the code of conduct and agree to abide by it.

Bridge has a designated person who is responsible for making sure that the child safeguarding measures are integrated throughout the organization and acts as a focal point. At each appropriate level Bridge has a named person who people can talk to about child safeguarding matters. At the Academy level the Academy manager is the designated lead and works closely with the operations team to prevent and respond to safeguarding issues within the school. Both roles reflect the nature and structure of the organization and the person should be senior enough, and have enough support and resources, to carry out the role. Notably, all new employees receive child protection and policy training as part of their induction program. The review recognized that although it was not mandatory for support staff to be trained on safeguarding due to their little contact with children, it is useful for them to receive basic safeguarding knowledge to sharpen their safeguarding lenses

According to KCS Standards, this involves 'The identification of clear responsibilities and expectations for all staff and associates, supporting them to understand and act accordingly.'

in regards to their roles, responsibilities and attitudes since safeguarding is everyone's responsibility.

3.2.3 KCS Standard 3 - Procedures

We reviewed and analyzed Bridge's approach to encouraging reporting on potential child protection issues. Safeguarding policy commitments are integrated into existing organisational processes and systems and, where necessary, new procedures introduced. A procedure details the steps that need to be carried out to fulfil the policy. Child safeguarding measures need to be integrated throughout an organization's systems, processes, and operations to ensure the organization is child safe.

According to KCS Standards, this involves 'the regular monitoring and review of an organisation's its safeguarding measures'

Table 4 summarises the results of our assessment of Bridge's policies against KCS standards, which are then detailed in Table 3 of Appendix VIII. From the review it is evident that 90% of Bridges reporting and responding procedures fully comply with the KCS standards. Bridge has structured procedures for reporting suspected or disclosed abuse. Bridge has in place an effective system that enables them to document, respond, follow-up and monitor abuse cases in a timely and appropriate manner.

Notably Bridge has developed meaningful and effective relationships with external organisations and bodies that are able to provide appropriate support and advice on matters related to child protection. In Nairobi, they have partnerships with MSF and Childline who have supported Bridge staff in Child Protection training and received and supported cases referred to them by Bridge. Moreover, child protection measures are well integrated with all procedures and systems, HR policies, employee handbook, staff training materials regarding child protection and instructional materials related to life skills development/empowerment in relation to preventing child abuse.

Due regard is given to buildings, set up, design, and school layout to ensure child safety and protection. This is evidenced by the large windows in the classrooms, toilets were spacious and the strategic location of the Academy manager's office.

3.2.4 KCS Standard 4 - Accountability

Table 4 summarises the results of our assessment of Bridge's policies against KCS standards, which are then detailed in Table 4 of Appendix VIII.

Bridge has a dependable Tracking, accountability and monitoring system ensuring cases reported are appropriately responded to. Through a collaborative process, the Customer Care and CIAU respond to cases and support the People Ops department to resolve cases flagged. The school is deliberate about reviewing any child protection cases or incidents to see what lessons can be learned and evaluate if any revisions to policies or procedures are needed. The Child protection Policy is reviewed annually through a collaborative process between the management and school staff.

4 - Discussion of key findings

4.1 Bridge Kenya has significantly lower incident rates compared to government schools

The results in Section 3 demonstrate that Bridge has significantly lower sexual abuse incident rates across all the abuse categories for which we could find a benchmark. We believe that this was achieved via a combination of decreasing the risk factors & increasing the protective factors associated with child sexual abuse and exploitation (UNICEF, 2016; Baiocchi et al., 2019). To create the analysis framework used to identify the elements of what was working to lower incidents of sexual abuse by teachers, we referred to how closely the organisation followed its safeguarding policies and procedures. This included assessing all the sexual abuse cases against the most recent child protection policy, and carrying out a deepdive into 10 cases.

1 - Clear policies & procedures that underscore commitment to child safeguarding

Bridge has clearly laid out policies to prevent harm to pupils and outlines the steps that must be taken should an incident occur. In contrast, clearly defined policies are lacking in government schools, which do not have a stand-alone policy on child protection but rather rely on multiple policies, and do not lack a comprehensive detail on steps to be taken when an abuse occurs which results in teachers not understanding how to act when incidents occur (Section 3.1.2). The Bridge Child Protection Policy clearly outlines the procedures for handling abuse cases and ramifications of failure to comply. When a case is reported, a ticket with a tracking number is logged and updated on an ongoing basis in the internal digital issue tracking system - Mantis. The red flag email alerts when any sexual abuse ticket is logged ensures that the child's welfare is always front of mind for both the local executives in Kenya, and global leaders including the organisation president and CEO, and finally, to ensure that the step-by-step process is systematically followed with oversight across different departments, Bridge has the Critical Incident Advisory Unit (CIAU), which provides interdepartmental oversight & advice to the academies until a case is closed.

Nevertheless, we identified some gaps related to increasing advocacy of these policies not just in the support office but also among academy staff and child-friendly versions of the policy for pupils. From the academy manager interviews, we discovered that the academy managers did not fully understand that there was expert support provided by the CIAU or that Bridge would provide them with additional resources during the investigative process such as legal advice when going to court as a witness or financial support to cover associated expenses such as medical tests or transport to health facilities for the children. Sexual abuse by academy staff occurs very rarely, and it is possible that many academy managers

have simply never ‘seen the policy in action’ during an investigation and don’t fully understand or experience the processes involved - nevertheless, all academy managers must have the process at their finger tips due to how critical properly handling sexual abuse is to the welfare of pupils. Our recommendations are provided in Section 5.

2 - Evidence of the use of multiple reporting pathways, including anonymous ones

As per Bridge reporting protocols, all witnessed, suspected or alleged violations of the child protection policy should immediately be reported to Customer Care via the toll-free phone number. Customer Care also provides reporters with a ticket number that they can continually refer to when following up on an incident, which allows for proper record keeping. Personnel are also advised in the policy to report the case to the academy manager who is the designated child protection officer at the academy level. The critical role of the academy manager is not to investigate but rather to escalate all such violations to the Support Office. The child protection policy lays out a step by step reporting procedure that also advises on how to react to a report & what facts to gather. The child protection policy also encourages reporting to the school leader who is the designated child protection officer at school level.

Table 5 summarises our findings related to reporting. We found that the most popular means of reporting to the support office was via the toll free customer care line, which made up 47.9% of the reports, followed by direct calls to the schools supervisors who then logged tickets in Mantis. In the Support Office, Customer care associates are the most frequent first points of contact when an incident arose. From all the sexual abuse cases reported since 2013, we found that indeed, the academy manager was actively involved in reporting 80.3% of all cases to the support office. In the majority of the cases where the academy manager did not contact Customer Care themselves to make the first report, we found that either the parent called customer care via the toll free number or directly called the school supervisor/member of the schools team.

It is worth noting that the Bridge tracking system is remarkable; most institutions do not have such structure and are unable to document information needed to make such analysis.

Table 5: The preferred means of reporting abuse cases to the support office, the first support office staff members reported to, and tickets where the academy manager is involved in reporting.

Method of informing the support office	Tickets, %	First Support Office staff member to be informed	Tickets, %	Are academy managers involved in initial reporting? ie called CC or Schools Team	Tickets, %
Toll-free call	47.9%	Customer care associate	60.6%	Y	80.3
Direct call	32.4%	Schools Supervisor	35.2%	N	19.7%
Email	15.5%	Schools Team Officer	2.8%	Total	100%
In-person	4.2%	QA	1.4%		
Total	100%	Total	100%		

While we can not determine how many sexual abuse cases at Bridge go unreported, we believe that a toll-free, anonymous channel available to any member of the public such as the Customer Care toll free line provides a significant advantage over the options available to government staff or parents (Section 3.1). We also see from Bridge records that reporters sometimes adopt other channels such as reporting directly to the field support teams that interact more closely with schools such as Schools Supervisors, Quality Assurance associates, and there were also instances where individuals preferred to report cases in-person, at the Bridge support office.

This direct reporting to the Support Office via Customer Care is contrasted with the reporting process available via the TSC in government schools (Section 3.1) which must go 4 steps before reaching the commission, leading to many opportunities for a “cover up”.

One gap we identified related to reporting channels is that pupils are not contacting the support office directly, and seem to predominantly report to adults who eventually report to the support office. While this may be indicative of children not having access to cell phones and also trusting the adults around them, we are concerned that Bridge may be missing cases where children are afraid to open up to adults directly. Furthermore, we are concerned that in the majority of cases, it is the academy manager calling customer care to report incidents rather than the teachers, who are indeed reporting, but choosing to do so via the academy manager rather than calling Customer Care themselves. We found out that the Customer Care number is well-known to all staff who use it as the primary reporting channel whenever an incident of concern arises such as emergencies, misconduct or other concern. The number is also displayed in prominent visible locations in the school, and is shared widely with both parents and academy staff. When we investigated the frequency of use of the Customer Care number, we found that the majority of all calls to Customer Care are made by teachers, who know to follow up consistently when

there is a concern on other issues. We also found that Bridge teachers have on numerous occasions sent anonymous whistleblower emails directly to the company executives to raise concerns, and so we were surprised that they choose not to use those pathways to report the sexual abuse of pupils. However, it is likely that only a few teachers have email and must therefore go to an internet cafe for access, which might make this reporting option more challenging for them. To resolve these gaps, in Section 5, we've proposed child-friendly reporting mechanisms and the need for further investigation of the proportionally low direct calls to Customer Care by teachers and parents compared to academy managers.

3 - Good record keeping

Carefully kept records make it possible to analyze any trends across gender, age, abuse type year on year, and allow for reviewing the cases internally for compliance against policy because patterns might help with communication and engagement to prevent future incidents. It is also the best demonstration that safeguarding standards are in place. Notably, Bridge has consistently kept digital records since 2013. The Bridge Child Protection Policy stipulates that suspected sexual abuse incidents be reported to Customer Care, who are charged with logging all incidents in the Mantis ticketing system. Incident reports are then generated & updated within Mantis as the step by step investigative process for sexual abuse is followed. We found that Mantis records were extensive, accessible, and organised. The mantis system date stamps any alterations to tickets noting when alterations are made and by whom, which makes it clear if any records have been tampered with. Furthermore, Bridge periodically creates a backup of the Mantis data to ensure that the information is never lost.

We carried out an in depth analysis of 10 case studies and found that the records were consistent with the laid down procedures, there was no evidence that records were changed or amended after an allegation had been made, and that the cases followed a clear pattern of recording and escalation. We also held discussions with Academy Managers who revealed that access to all case records and information is controlled and can only be shared on a need to know basis specifically to the police, government officials and social services ensuring that this does not put anyone, including children, at further risk.

4 - Investigation of all reported cases & zero-tolerance for sexual abuse

It is important that sexual abuse perpetrators are removed timeously from schools to prevent further abuse of pupils. Punishing and expelling perpetrators also acts as a deterrent to others by demonstrating clear legal consequences of sexual abuse. We

found that the termination rate at Bridge was 100% for all perpetrators following internal investigations. This is particularly significant compared to government schools where the TSC not only admits to just 10% of cases being reported, but even for those reported, just 70% are dismissed or retired, with the 30% being recycled back into other institutions (Nguunzi, 2014). Ruto(2009) found that when school girls were impregnated by teachers, only 54% were sacked, arrested or punished, and the rest suffered none or minor consequences. One of the issues highlighted by Nguunzi (2014) was that teachers do not report on other teachers/head teachers for fear of being fired. Bridge reverses this, by having a clear, stated and acted on policy that if it becomes known that other Teacher/headteacher/supervisor knew and did not report, that person is terminated as well. Indeed, we were provided evidence of Bridge terminating those that knew and did not report. We also identified that a zero tolerance towards even other forms of child abuse may be critical to preventing sexual abuse incidents. In the study by Nguunzi (2014) children reported to acquiescing to sexual abuse because they wanted to avoid being beaten. Zero tolerance must also extend to abuse such as corporal punishment so that children understand and should see that there are repercussions for those that try to beat them, which we believe would make them more willing to speak out.

We analysed all cases of alleged sexual abuse of pupils by teachers reported to Bridge regardless of the outcome of the investigation. We found that from 2013 to 2019, all *the suspected* reports (tickets) of sexual abuse were investigated by Bridge, resulting in terminations (83.5%), clearing the alleged perpetrator of the accusation (15.3%), or warning the alleged perpetrator (1.2%). We assessed the incidences where the perpetrators were either given a warning or cleared of abuse to ensure that there was sufficient reason to clear the perpetrator. Even in these cases, we found that the Bridge staff still erred on the side of caution, and reported 42.9% of these cases to the police to ensure more thorough investigation, and the possibility of later action against the reported individual if merit was later found. Table 6 shows the ramifications of misconduct of all cases where internal investigations showed that an academy staff member was responsible for the sexual abuse of pupils. Bridge terminated 100% of the perpetrators. We found that Bridge reported 100% of the attempted defilement and sugar daddy defilement cases to the police. For defilement, 87.5% of cases were reported to the police, while in one case, the parent refused to have the police involved. Indecent acts appear to be the most difficult for Bridge to get the police involved, and the reporting rate to the police is 46.5%.

Table 6: Employment ramifications & reporting to the police by abuse category for all the perpetrators

	Employment ramifications	Reporting to the police			
	Terminated by Bridge	Y -	N -	N - the parent(s) refused	Y - but police turned Bridge away
Indecent Acts	100%	46.5%	46.5%	4.7%	2.3%
Attempted defilement	100%	100.0%	0.0%	0.0%	0.0%
Sugar daddy defilement	100%	100.0%	0.0%	0.0%	0.0%
Defilement	100%	87.5%	0.0%	12.5%	0.0%

Based on our analysis of the gaps in reporting to the police, we see that all attempted defilement, sugar daddy defilement have successfully been reported to the police, and just one defilement case, where a parent refused to co-operate was not successfully reported. However, we're not surprised that Bridge has a much lower success rate of reporting Indecent Acts to the police, such as when a teacher verbally or in writing propositions a pupil. The [Sexual Offences Act](#) unequivocally condemns indecent acts, and says anyone that commits them *'is guilty of an offence and is liable upon conviction to imprisonment for a term which shall not be less than five years.'* Even though these acts are clearly precursors to more severe abuse such as sugar daddy defilement (Ruto, 20019), these acts tend to be perceived as not severe (defilement, the most severe offence, is punishable by 15 years to life) and worse still, police likely feel burdened to respond to them because of the lengthy and cumbersome legal procedures associated with sexual abuse cases. According to [Bunusa \(2011\)](#), police officers are not properly trained to investigate sexual offences, and indecent acts which do not have any physical evidence are likely poorly understood and thus ignored. Furthermore, we found that the only type of evidence specifically identified by name in relation to sexual abuse by the [Children Act](#) was medical evidence, which is not available in cases of indecent acts. A lot needs to be done at the national level to advocate for better definitions and laws when it comes to prosecution around child sexual abuse and specifically indecent acts.

With that said, we recommend some additional tactics during the course of reporting incidents that may result in increased action from police, and in particular to support police action in response to reporting indecent acts. Cases can also be referred to the County and Sub-County Children's Office, who can escalate them for prosecution. These officers have the authority to push for prosecution even when parents have refused to cooperate, and they also assist in evidence building and

locating of witnesses with the support of the Police. This can also be done in the case of indecent acts where medical evidence is not possible or applicable. Children Officers are supposed to intervene in the best interest of the child. We also recommend requesting to speak to the Gender Officer on duty when reporting to the Police, as each station is supposed to have a designated Gender Officer, who presumably should be more responsive to such reporting.

In addition, in our interviews with academy managers, some were understandably apprehensive and uncertain about the procedures related to reporting and following up on cases of indecent acts with the police and in the courts. Ensuring that as part of the regular and ongoing training managers receive the support the CIAU and Bridge legal team will provide is made clear, which may make managers more confident in their handling of such incidents which may be trivialized by others.

5 - Attempted abuse & indecent acts are also being tracked

We believe that tracking and punishing even the less severe (severity defined based on the extent of punishment described in the [Sexual Offences Act](#)) has helped Bridge remove perpetrators early before they progressed to more serious offences, likely resulting in lower incident rates. The [Sexual Offences Act](#) clearly identifies attempted defilement and indecent acts as punishable offences, and from literature indecent acts such as propositioning pupils are clearly sexual harassment and are precursors of sugar daddy defilement (Ruto, 2009). This is also why it is critical to treat proposals and other “indecent acts” as sexual abuse, and act swiftly and strongly, and Bridge does this. According to Ngannzi(2014), perpetrators are often repeat offenders; 35% of pupils cite that a single teacher is likely to be abusing 4 or more pupils. Worryingly, the author notes that one of the key problems is that 100% of pupils and teachers define sexual abuse as only penile penetration. We found similar sentiments in other studies, and notably these are the 2 benchmarks that were hardest to establish. We believe that by not actively tracking and reporting these offences, government schools are missing the opportunity to remove perpetrators of these less severe forms of abuse before they escalate into defilement.

The one area of improvement we found was that Bridge currently categorised indecent acts to include sexual harassment, and should consider separating these cases to better fit legal definitions, even though at this time, the categorisation is not adversely affecting how the organisation responds to the cases. The [Sexual Offences Act](#) says that an ‘indecent act’ against a child is punishable by not less than ten years and *‘means an unlawful intentional act which causes (a) any contact between any part of the body of a person with the genital organs, breasts or buttocks of another, but does not include an act that causes penetration. (b) exposure or display of any pornographic material to any person against his or her will;’*. ‘Sexual harassment is punished less severely and is defined as follows. *‘Any person, who*

being in a position of authority, or holding a public office, who persistently makes any sexual advances or requests which he or she knows, or has reasonable grounds to know, are unwelcome, is guilty of the offence of sexual harassment and shall be liable to imprisonment for a term of not less than three years or to a fine of not less than one hundred thousand shillings or to both’.

6 - Support Office & Academy staff receive training on child safeguarding

We found that Bridge used training to ensure that academy staff members were aware of their safeguarding obligations and responsibilities, especially as mandatory reporters and to be made aware of the reporting pathways available to them. All teachers and academy managers receive training on child safeguarding, and we reviewed evidence of training via [the training calendars](#). For both types of staff, child safeguarding is included during the induction training, and we also reviewed [case interview questions and group discussions](#) that tested and coached staff on ethics related to child abuse incidents.

With regards to academy managers, we were satisfied that they received on-going refresher training on child safeguarding at least 2 times in a year during the Academy Managers Summit at the Bridge training centre, according to a schedule that was carefully managed by the Support Office. However, even though teachers received carefully managed training during their induction, scheduling and carrying out on-going refresher training on child safeguarding for teachers was left to academy managers to schedule during the weekly Saturday Summits at each individual academy. We believe that there is an opportunity for the Bridge Support Office to manage the refresher training of teachers more closely, with a clear schedule & content shared with academy managers and we’ve made some recommendations to this effect in Section 5. The other gap in training is for the groundskeepers, who have also been implicated as perpetrators in pupil sexual abuse incidents - it is unclear what training they receive, and how often they get refresher training. Other gaps in training include for the CIAU in the Support Office, which is the standing committee that advises academies during the investigative process of child sexual abuse cases - we found that they received training when the committee was established, and the key members such as those in People Operations actually train other employees. However, the most recent joinee committee member had not received training yet; although he did join when schools were closed due to Covid-19, and regular activities were paused.

7 - Life skills education helps Bridge pupils

Another important consideration with respect to creating a child safe environment is teaching the children themselves to identify and report abuse. In 2008, life skills education was introduced in Kenya via a directive from the government for the lesson to be provided once a week in both primary and secondary schools (Njeng'ere, 2014). Unfortunately, the limited learning hours per day in government schools and the fact that Life Skills is not a core examined subject means that many teachers do not give the subject much consideration because they would rather commit the limited learning time to teaching examinable core subjects. In fact, Langat (2017) reported that the subject was not even included in some school's timetables. This has likely had a negative effect on students since the intended purpose of equipping the students with skills of handling or coping with various situations, including sexual abuse, becomes compromised.

From analysis of the reporting chain of tickets, we found that pupils at Bridge actively report all forms of abuse including indecent acts & attempted defilement to either their parents or teachers is a sign that Bridge is making progress in changing children's and teachers' perceptions about sexual abuse. We found that Bridge has taken advantage of the school curriculum to run lessons that help to lower risk factors & increase preventative factors related to child abuse (UNICEF, 2016; Baiochi et al, 2019). The life skills curriculum content at Bridge includes teaching on the dangers of intoxication from drugs and alcohol consumption, identifying ways to deal with emotions such as seeking for help, pupils learn how family background affects how children feel about themselves, pupils outline appropriate steps to take when confronted with danger such as: shouting for help, saying no to proposals and other "trade" offers. Pupils identify dangerous places such as dark places, corners, bushes. We found that Bridge used carefully created learning guides for Life Skills lessons and has the ability to monitor whether lessons are indeed carried out in accordance with the time table and the CBC/8-4-4 curriculum. When we interviewed the Academy Managers, they also elaborate on the importance of these lessons in empowering pupils to better understand themselves, their environment, and the rights entitled to them with regard to safety. They also pointed to the evidence of implementation of life skills training as evidenced by the character boards across all classrooms. Students who display outstanding character in different aspects are recognised on the board. This is a way to motivate students to live out the skills taught to them during these classes.

During interviews with the Bridge academics team, they highlighted some ideas that can be used to further improve the life skills curriculum with the aim of reducing sexual abuse such as: Add 'safe touch' lessons to First Week of School programming as is done in Bridge Nigeria because the first Week of School is an opportunity to introduce important habits to being a Bridge pupil; reminders of how to respond to inappropriate touch should be part of it. Additional recommendations were to add a 'Life skills' lesson to grades 1-7 with a focus on prevention of abuse,

add a 'Health' lesson to Age 3- 5 with a focus on prevention of abuse, and add a 'Social Studies' lesson to grade 8 with a focus on prevention of abuse.

8 - Child follow up & support after sexual abuse

The percentage of victims receiving medical exams supported by Bridge was found to be highest for the 2 abuse categories where penetration occurs including defilement (83.3%) and sugar daddy relationships (80.6%). These results are summarised in Table 7. It is possible that more children undertook medical exams without Bridge arranging them, but it is not known. Bridge ensures that the victim receives a medical exam and covers associated expenses for the tests & transport to the facilities for the tests to be carried out. Table 7 therefore captures medical exams that Bridge personnel supported the child to receive, and paid for. However, it is not clear what happened outside of Bridge's actions and so additional support may have been provided in the community but not logged in the ticket because Bridge personnel did not accompany the child.

Table 8 summarises the cases where Bridge knows the child had counseling, because it was offered, referral made and supported. It is worth noting that Bridge did not have counselling as part of the written policy until late 2018, up to which point it was happening without being properly documented. Therefore Bridge only started to actively monitor the occurrence of counselling via the online ticketing system in 2019. We also learned that even when tickets are marked as 'resolved/closed' in the Bridge ticketing system, the Bridge team continues to support pupils, sometimes for years. For example, one of the Schools Supervisors shared that she continued to attend court proceedings on behalf of a pupil more than 2 years after an incident occurred, and had to reach out to the victim even when they were no longer Bridge pupils and were attending secondary schools, to encourage them & their parents to continue pursuing the court case so their abuser can be punished. A number of Bridge academies also have designated guidance and counselling teachers who provide on-going psychosocial support to all pupils that require it at the school. Because their work is part of the daily proper management of the school, it is not always recorded in the ticket to reflect counselling sessions provided to an abused pupil.

Table 7: Percentage of the victims getting medical exams

Category	%, Medical exam		
	%, Medical exam done	Exceptions, %	No medical exam, %
Indecent act	Abuse is not penetrative so a medical exam for defilement not required. However 5.7% of victims got an exam		
Attempted defilement	Abuse is not penetrative so a medical exam for defilement is not required. 0% of victims got an exam		
Sugar daddy relationship	80.6%	12.9% <i>In these cases the parent/pupil was either actively resistant & there was a case where the pupil had married the perpetrator.</i>	6.5% <i>In these cases the reason for lack of medical exam was unknown. It is also likely that they were done but not recorded on the ticket</i>
Defilement	83.3%	8.3% <i>Case was reported the following term making a medical test invalid.</i>	8.3% <i>In these cases the reason for lack of medical exam was unknown. It is also likely that they were done but not recorded on the ticket</i>

Table 8: Percentage of the victims getting counselling

Category	%,Counselling		
	Counselling given, %	Exceptions, %	No counselling recorded on ticket, %
Indecent act	23.9%	8.0% <i>Parents/pupils were uncooperative during the investigation</i>	68.2% <i>Unclear why counselling was not offered/recorded on the ticket.</i>
Attempted defilement	57.1%	14.3% <i>Parents/pupils were uncooperative during the investigation, for example, there was one male victim who expressed not wanting the case discussed - Bridge Support Office staff members spoke to him, which was a form of</i>	28.6% <i>It is unclear why counselling was not offered/ recorded on the ticket. One victim was reported during the school holidays when academy staff are on leave and field teams are not as active - it was likely an oversight.</i>

		<i>counselling</i>	
Sugar daddy relationship	61.3%	16.1% <i>Parents/pupils were uncooperative during the investigation. Also, there was a victim who was no longer in school and seemed to have got married to the teacher</i>	22.6% <i>Unclear why counselling was not offered/recorded on the ticket</i>
Defilement	25.0%	8.3% <i>Parents/pupils were uncooperative during the investigation.</i>	66.7% <i>Unclear why counselling was not offered or recorded on the ticket. There was a case which was reported the following term -possibly an oversight from the team to offer counselling. All these tickets were before 2018, when referring to counselling was not in the policy and thus likely not ticketed</i>

Bridge has supported referrals to counseling, including a close partnership with Medecin Sans Frontier (MSF) since 2016. MSF visits Bridge schools in Nairobi slums to provide age appropriate training to pupils on sexual abuse (including puppet shows for very young pupils). MSF has also provided Bridge schools with posters with emergency contact details in case of abuse, and the organisation provides holistic care completely free including medical tests/rape kits, counselling programmes, connects victims to lawyers, and even has an ambulance service to collect victims if required. In addition, Bridge has compiled an extensive database of organisations that provide psycho-social support services, shelter and hospitals that offer specific support to sexual abuse victims. Furthermore, every Bridge school has a poster with the nearest health facility to the school identified so that all staff always know how to get rapid medical support. The database of partner organisations has mapped out 30 child welfare organisations, with contact details including phone numbers & key contact persons to reach out, and the organisations are identified by community so that when an incident arises at a specific school, it is clear which partners the investigative team & the CIAU can quickly recommend for the child to be taken to.

An area of strengthening for Bridge would be to expand partnerships with organisations such as MSF to cover Bridge schools across Kenya, since currently the MSF collaboration is only for schools in certain parts of Nairobi. Bridge should also continue to build on the database of partners, and we have added additional partners to consider in Appendix VI. Additionally, Bridge should ensure the parent

and their staff are aware that even in non-penetrative acts, they should request a P3 form from the police, and have it duly filled by a licensed medical officer. This will ensure greater pressure and documentation for police action.

9 - Physical infrastructure at schools limits opportunities for abuse

In a study by Ngunnzi (2014), 83.6% of abuse reported by pupils happened in or adjacent to school or during school co-curricular activities; only 16.4% at teachers house. This points to the importance of vigilance at schools. During a visit to a Bridge academy, we observed that classrooms had large windows which enabled the academy manager and teachers to get a full view of the going-ons in class - the academy manager's office was at a vantage point enabling them to easily see the classes and the gate. The Bridge leadership shared that the design of the classrooms was done specifically to ensure the inside of every classroom is visible from outside, allowing other teachers, the academy manager, other pupils and parents to always see inside. There is intentionally no "privacy", and that it is emphasized that all adult-child interactions should be visible at any time. Bridge also has no separate, private, window-less "staff room" which is cited as location of sexual abuse 16.8% of the time (Ngunnzi, 2014). There is the school leader's office, but like all classrooms, it has wide open windows kept open at all times. Even though Bridge initially incorporated many of these measures for learning observations and teaching coaching as primary drivers, we believe that these measures also minimize the use of the school as a location for abuse.

It is also important to carefully manage the area surrounding the school so as to prevent abuse occurring off campus. TSC records state 32% of teacher-pupil abuse happening in the bushes near school, and pupils report abuse in bushes at school as happening in 18.4% of abuses by teachers (Ngunnzi, 2014). Girls from a study by [Parkes & Heslop \(2011\)](#) explained that teachers would send a student to run personal errands for them in their hose, which eventually leads to sex. We found out that Bridge facilities have a clear boundary, and are neatly kept inside the boundary, so the concern of abuse "in the bushes" is reduced. Finally, Bridge has made efforts to prevent incidents of abuse that might occur at teachers homes - the Bridge child protection policy expressly forbids teachers from having pupils in their homes, and also forbids teachers from going to the home of a pupil unless they are in the company of another adult, and the child has an adult family member present.

We learned that Bridge has a Quality Assurance (QA) team in charge of conducting facilities audits, which we encourage Bridge to expand to close monitoring of the school perimeter to remove any nearby bushes that could be used as abuse sites. Furthermore, it is paramount that Bridge continue to emphasize to pupils the importance of never going to a teachers home, or meeting them alone and unobserved on the school campus.

10 - Bridge carries out strong background checks on academy staff

We studied Bridge's recruitment processes to determine how carefully the organisation was carrying out background checks to ensure that teachers, academy managers and groundskeepers were individuals of good moral standing without a history of abusive behaviour towards children. According to the [Academy Manager Recruitment Process](#), an individual must go through a series of interviews, which culminate in an on site induction training for 16 days. Every effort is made to ensure that the academy manager is sourced from the same community as the school and the recruitment process is shared across 2 departments, and across many leaders within the organisation which we believe improves accountability. Candidates undergo a number of screening activities including providing a note of good conduct (such as from the police or from the chief), phone screening, school visit assignment, then an in-person interview with schools supervisor, and the candidate must produce letters of recommendation from a number of community leaders including a Local leader/chief, Church leader, Community influencer along with a list of 5 community groups they belong to. Candidates also have to undergo a Reference Check, where Bridge calls their references and leaders of the community groups to verify their affiliation to the candidate. Thereafter, the candidate is invited to the assessment center which also includes [case study interviews on scenarios](#) related to handling child sexual abuse, a panel interview with select managers or directors, and more recently, the organisation's policy has been to have both the Schools Director & the MD interview academy managers. This is then followed by 12-15 days of induction training. Typically, the Bridge recruitment funnel starts with at least 10 potential candidates in order to fill 1 academy manager vacancy.

We believe that this process is very rigorous and contributes to identifying candidates who are well regarded in the community because it allows other individuals of good standing in the community to vouch for a candidate, and involves company leaders up to executive level in selecting those whose values are aligned with Bridge.

11 - Bridge carries out on-going improvements to safeguarding measures & remedial actions when incidences arise

83.5% of the schools have never had a single sexual abuse ticket, ie have an incidence rate of 0% across all abuse categories. Only 0.983% of all Bridge academies have had 2 sexual abuse tickets since 2013. All other schools with incidents (15.5%) have had only 1 ticket over 7 years. These results indicate that the remedial actions & improvements Bridge institutes following sexual abuse reports are effective -- and points to the success of prevention work as well.

Category of school	Percentage of Schools, %
2 sexual abuse tickets since 2013	0.983%
1 sexual abuse ticket since 2013	15.5%
0 sexual abuse tickets since 2013	83.5%
TOTAL	100%

4.2 There appears to be a link between poverty and transactional sexual abuse of girls in return for basic necessities

In all the literature we reviewed, the highest incidence rate of all abuse categories was that of indecent acts where teachers propositioned female pupils. According to [Ruto \(2009\)](#) one of the major causal factors for student -teacher relationships is poverty. It is fuelled by a salient expectation/ acceptance that girls can use their sexuality to benefit either themselves or their families. The teacher has authority and 'power' over the pupil, which places them in a position where they can ask anything of the child, including sexual favors.

Within the Bridge data, this abuse of power by offering low income children basic necessities becomes apparent not just in the sugar daddy defilement cases, but also in indecent act cases. Sugar daddy defilement is normally preceded by sexual grooming and we also found this for some of Bridge victims. According to [Radford et al.\(2015\)](#) sexual grooming is the deliberate preparation of a child for sexual abuse or sexual exploitation, motivated by the desire to use the child for sexual gratification. It may involve the befriending of a child, drawing the child into discussing intimate matters, and gradually exposing the child to sexually explicit materials in order to reduce resistance or inhibitions about sex. When grooming behaviors go unchecked, they often escalate into more severe forms of sexual abuse, including rape and defilement ([Adhami et al., 2017](#)). The prevalence of these sugar daddy relationships is further encouraged by societal norms where , especially in low income communities, girls tend to be married off young, and thus their involvement with teachers is barely frowned upon.

For example, within Bridge data, we found that the majority of the victims were girls (96.4%) and that victims were predominantly pupils in upper primary, with C5-C8 pupils making up 88.4% of the total victims. This could be attributed to the fact that girls in upper primary appear more sexually & physically mature, which makes them vulnerable to predators. Bridge has not eliminated the occurrence of teachers abusing their power to proposition pupils and engage in sugar daddy relationships with them, although it has radically reduced this occurrence compared to the literature reviewed. This could be attributed to the stringent child protection policy measures applied at the Bridge schools, extensive methods of reporting, termination

of staff in question, and embracing life skills topics that empower children and discuss such issues. In addition, Bridge's strict enforcement of indecent acts as terminable offences, likely prevents abuse from proceeding further.

4.3 There are large gaps in publicly available data on child abuse in government schools

No public data from government - We found that neither the Ministry of Education nor the Teacher Service Commission (TSC) release publicly accessible data on incidence rates of sexual abuse of learners by teachers in government schools. When we interviewed an official from the TSC, which manages the registry of government trained teachers, he indicated that cases about sexual abuse perpetrated by teachers occur but he was unwilling to disclose the actual data for fear of implicating his employer. However, the TSC does publish annual lists of teachers who are deregistered for various kinds of misconduct ([TSC Deregistered Teachers, 2017-Current](#)), and has also released data, via the [Daily Nation \(2019\)](#), on the number of teachers dismissed since 2010 for having sex with learners, which is shown in Table 2b. The TSC admitted that 90% of the sexual abuse cases go unreported, and so the data shown is an under representation of the incidence of abuse.

Few studies track incidence rates, and especially for less severe forms of abuse like indecent acts and attempted defilement - Given the limited data available from government databases, we relied heavily on publications from independent studies done in Kenya on the sexual abuse of children. Even then, we found that of the many studies carried out, only a few explicitly reported incidence rates of sexual abuse by teachers. In total, we reviewed over 50 sources (refer to [Appendix I](#)) and only found acceptable benchmarks for girls, and none for boys. This lack of data means that the government and other researchers are missing the opportunity to track abuse and safeguard learners which likely results in perpetrators remained in schools long enough to commit the more severe offences like rape.

Lack of data on abuse of boys - We found that lack of data on abuse of boys by teachers is particularly significant as discussed in Section 2.2. The large majority of the literature reviewed studied the abuse of girls by teachers but not that of boys by teachers, which we found quite alarming because we found numerous sources that cited that boys are experiencing sexual abuse. A study on Violence against boys in Nairobi (Munyambu, 2007) found out that sexual victimization of men and boys makes them believe that they can only be the aggressors hence as a victim there is no need to alert others that you have been sexually violated. Odoro (2016) reported that boys experienced a range of sexual abuses. Among boys, it appears that issues of sexuality are not dealt with as openly as among girls, and which likely influences the silence around the issues of sexual violence.

At Bridge, the reported incidence rates of abuse of boys by teachers are significantly lower than those of girls. However, based on our review of the literature on abuse of boys, we believe that the additional shame and stigma associated with such sexual violence is indication of widespread silence and consequently, significant under-reporting. We recommend that Bridge consider this a potential area of under-reporting and to consider & address the possibility that boys may not be reporting abuse by teachers due to societal and cultural norms. Ways to address this include during life skills lessons & via child rights clubs.

5 – Identifying Areas for Enhancement or Improvement

Our findings from benchmarking Bridge against government schools show that the organisation is indeed implementing robust policies and procedures that correlate with the lower incidence rates of sexual abuse of pupils by its teachers. We also found that Bridge compared well against the tough globally recognised Keeping the Children Safe Standards, which demonstrates the organisation's commitment to preventing child sexual abuse which disproportionately affects children in low income communities such as those Bridge serves. In the course of our review, we identified areas where we felt Bridge would benefit from strengthening. Furthermore, we believe that education providers should continue to aspire to tougher standards, and so we also identified new practices that Bridge should consider as the organisation journeys towards becoming a leader in child safeguarding. Our recommendations are detailed below.

5.1 Ten key recommendations

1. To ensure a distinction between child safeguarding and child protection obligations and encourage uniformity in terminology across Bridge Safeguarding documents, Bridge should consider revising the use of the term “child protection” to “child safeguarding”. Child Safeguarding is defined as a set of policies, procedures and practices employed to ensure that an organization is safe for children. Safeguarding is internally-looking where the concern involves a staff member, volunteer, visitor or partners, or a stakeholder. On the other hand, child protection is defined as measures taken to prevent and respond to abuse, neglect, exploitation, and all other forms of violence against children. Child Protection is usually externally looking, and the concern relates to potential, actual or suspected abuse of a child by the family or community.
2. Bridge should develop a child-friendly version of their Child Protection Policy. These documents should be clearly displayed in classrooms & schools such as on posters. These posters would be directed at children as constant reminders that equip them with the tools to prevent and respond to sexual abuse.
3. Related to the above point, Bridge should ensure that parents & all staff have access to a condensed version of the policies and procedures, which should also be translated into Kiswahili. This condensed version of the policies could be in the form of infographics (posters, boards, pamphlets) and would be distributed during parent-teacher summits. To ensure wider dissemination of the child protection policy to parents & other stakeholders and to demonstrate clear commitment to safeguarding, we recommend that Bridge provides a digital copy of the policy on the companies' website. A sample child-friendly poster of the Child Safeguarding Policy of Save the Children is provided in Appendix V.

4. Bridge should include a reference to the CIAU in the child protection policy. While the role of the CIAU is well known in the support office, and to the people that support sexual abuse investigations, the CIAU is not referred to in the child protection policy. While the entire processes of the CIAU need not be included, there should at least be a reference to the CIAU guiding documents.
5. Bridge should develop child-friendly feedback and reporting mechanisms, supported by designated Guidance and Counselling teachers. One gap we identified related to reporting channels is that pupils are not contacting the support office directly, and seem to predominantly report to adults who eventually report to the support office. While this may be indicative of children not having access to cell phones and also trusting the adults around them, we are concerned that Bridge may be missing cases where children are afraid to open up to adults directly. These feedback mechanisms can include face-to-face meetings in class groups and peer counseling. A toolkit for creating a Child Friendly Feedback Mechanism by [Plan International](#) is provided in Appendix V. Bridge could consider using prefects ie headboy & headgirl as a reporting mechanism although we are concerned that prefects are sometimes viewed as ‘informers to teachers’ and may not necessarily be trusted with confidential information by other pupils. One approach Bridge could take is to strengthen training to the head girl and head boy to emphasize leadership when it comes to safeguarding their peers.
6. Related to point #5, consider establishing child rights clubs or incorporating a child protection focus in existing clubs like the debate clubs, as part of extra-curricular activities in Bridge academies. These clubs are important avenues to disseminate child protection education in schools. Through these child rights clubs, children become well-versed with information on child rights, what child abuse is, how to report child abuse incidents, and helps them gain confidence in reporting abuse issues. A toolkit for a child rights club activities recommended by Save the Children is available [here](#). With regards to the fact that older girls are disproportionately affected by sexual abuse, especially sugar daddy defilement, Bridge should consider peer-to-peer support programmes such as mentorship programmes for girls/role models, where they can be encouraged to look out for one another. Bridge does have a peer-to-peer Maths mentoring programme where children help each other, and this could be used as a reference to develop a peer-to-peer support programme for safeguarding. With respect to programmes targeted at helping girls prevent abuse, in the research papers were reviewed, we found some reputable, globally recognised programmes such as those run by [No Means No Worldwide \(NMNW\)](#) & [Ujamaa Africa](#) (Baiocchi *et al.* 2019).
7. Bridge should strengthen child protection training & refresher training for teachers, groundskeepers, and the CIAU. Even though Bridge teachers receive carefully managed training during their induction, scheduling and carrying out on-going refresher training on child safeguarding for teachers is left to academy managers to schedule during the weekly Saturday Summits at each individual academy. We

believe that there is an opportunity for the Bridge Support Office to manage the refresher training of teachers more closely, with a clear schedule & content shared with academy managers. The other gap in training is for the groundskeepers- it is unclear what training they receive, and how often they get refresher training. Other gaps in training include for the CIAU in the Support Office, which is the standing committee that advises academies during the investigations of child sexual abuse cases - we found that although they received training when the committee was established, and the key members such as those in People Operations actually train other employees, there is no set scheduled for refresher training. Those carrying out investigations within the People Operations team/CIAU would also benefit from gaining skills about how to undertake interviews and build rapport with children and other witnesses as part of any investigation. Keeping Children Safe has a curriculum for investigators described [here](#).

8. We observed that there have been cases where Bridge has struggled to convince parents to allow the child to file a report about an incident or where police officers were reluctant to file a case. In these cases, Bridge must rely on the support of the County & Sub-county Children's Officers (government representative on children affairs) to provide assent on behalf of the child, which removes the need for the parent's consent. It is good practice, but not mandatory to always involve the Children's Officers when a sexual abuse case arises in case where challenges arise in reporting to the police or in securing investigation by the police. Furthermore, Bridge should update the referral pathway to ensure that when at the police station, the designated Gender Focal Point who manages the gender help desk of the station is involved to ensure that the case is handled appropriately.
9. Bridge should identify & strengthen relationships with already established partners such as Medecins Sans Frontier & Childline to work with on survivor support, and also ensure that staff have a process of follow up related to survivor support. For best practices, the Bridge designated Child Protection Officer can review the [National Guidelines on Management of Sexual Violence in Kenya](#), and [National Standard Operating Procedures for Management of Sexual Violence Cases in Children](#) which highlight the key process which include referral pathways for psychosocial support of child survivors of sexual abuse, flowcharts of the support process to follow, and contact details of those that provide specific services eg health & legal depending on the type of abuse.
10. Bridge should continue to strengthen their working relationship with the TSC to verify the status of new hires and to help deregister perpetrators. Bridge has not been successful in attempts to report TSC registered teachers that have sexually abused children to the TSC for deregistration - despite in-person visits to the TSC & writing letters to which the TSC did not respond. Historically, the TSC was also uncooperative when Bridge requested for lists of blacklisted teachers to use as a

reference during recruitment. Nowadays, the TSC publishes lists of deregistered teachers via their website, and any member of the public can type a TSC teacher number into the [online teacher registry](#) to determine whether a teacher is deregistered. However, the registry is not properly updated & is unreliable because when we typed in numbers of TSC teachers that were [deregistered in March 2020](#), they still appeared as teachers with a valid registration 5 months later (refer to screenshot in Appendix IX). We also attempted to call the TSC hotline numbers touted as reporting channels during the course of this project, and found that they never went through & were always unavailable. We recommend that the Bridge government liaison should work hand-in-hand with the People Operations department to strengthen the working relationship with the TSC so as to get more reliable data on the validity of a teacher's registration, and to begin to make some inroads in eventually having perpetrators deregistered. Nevertheless, we anticipate that this will likely be a slow process since even the TSC struggles to discipline its own teachers when sexual abuse cases arise.

5.2 Additional considerations

We've compiled some recommendations that we felt were outside of the scope of this work, but were nevertheless valuable for Bridge to consider as the organisation aspires to become a leader in child safeguarding in Kenya.

1. Bridge should share the results from this review more broadly, so that it can be referenced as best practice by the government, other schools, and by key stakeholders in private education such as Kenya Private School Association (KEPSA) who are increasingly concerned about reducing the rates of child sexual abuse. Specifically, Bridge should share about the Critical Incident Advisory Unit (CIAU), the use of Customer Care toll free lines & the Mantis issue tracking system. In January 2020, [Keeping Children Safe also organised KCS Africa 2020, a conference on safeguarding within education in Kenya](#), which Bridge could have been a strong contributor to, to drive the agenda of child safeguarding forward in Kenya. There are also numerous gender & child protection stakeholders within government who are increasingly rallying around the issue of child protection, [more recently around childhood pregnancy during Covid-19](#) because children have been out of school for an extended period. These government stakeholders include the Children Services that hosts the county & sub-county Children Officers, and the TSC Gender Focal Persons.
2. Cultural norms that normalise gender based violence and early marriage of girls are deeply embedded in Kenyan society. The culture in Kenya frowns upon reporting negative issues on authority figures, teachers tend to work as a 'brotherhood' that protects each other, poor parents have a culture of accepting hush payments from perpetrators when their children are abused ([Adhami et al.](#)

2017) and gender norms that view the abuse of girls as ‘normal’ or even ‘deserved’ persist such as reported by Nguunzi (2014) during a focus group discussion when a participant responded that *‘a woman was created for that. I do not see the teacher's offence in all this except may be the fact he has introduced the girl to the works too early. But she will grow...’* and even within Bridge, parents refuse to participate in investigations or reporting to the police. These societal norms mean that Bridge will likely continue to face challenges associated with cultural dynamics when it comes to tackling issues related to sexual abuse. We propose that Bridge considers community-wide efforts to change mindsets and behaviours not just of teachers, but of parents as well. Bridge can leverage the existing empowered mothers programme referred to as ‘Super Mamas’ who can play a role as the link between children and the school, and be vigilant community members. In partnership with child focused organisations and Super mamas, Bridge could provide sensitisation to the parents and community on child protection, which would help not only tackle abuse by teachers, but abuse by other perpetrators such as other children, and family members, who studies have shown actually disproportionately abuse children compared to teachers.

3. During [interviews with the Bridge academics team](#), they highlighted some ideas that can be used to further improve the life skills curriculum with the aim of reducing sexual abuse such as: adding ‘safe touch’ lessons to First Week of School programming as is done in Bridge Nigeria because the first Week of School is an opportunity to introduce important habits to being a Bridge pupil; reminders of how to respond to inappropriate touch should be part of it. Additional recommendations were to add a ‘Life skills’ lesson to grades 1-7 with a focus on prevention of abuse, add a ‘Health’ lesson to Age 3- 5 with a focus on prevention of abuse, and add a ‘Social Studies’ lesson to grade 8 with a focus on prevention of abuse.
4. We noted that there is a designated Customer Care associate that sits on the CIAU, and is responsible for ensuring that incident details related to a sexual abuse cases are captured accurately, and in full at the point of first reporting. Bridge should consider training this customer care associate on the proper legal terms when logging tickets in the internal incident tracking system. Generally, those calling Customer Care to report incidents tended to categorise all abuse as molestation at the point of reporting which we felt could be captured more accurately to better inform the CIAU & investigative teams as they rapidly kick start investigations. Specifically, the Customer Care associate in charge of recording sexual abuse tickets should be trained on how to differentiate between indecent acts, sexual harassment, attempted defilement, defilement so that tickets can be coding accurately from the time of reporting to allow clear & consistent implementation of the coding of the incidents into Customer Care. However, the child protection policy & actions of the CIAU accurately capture the definitions, but during their periodic audits of sexual abuse incidence, the CIAU should consider adding to their agenda the ongoing review of the tickets to ensure rapid correction.

The Customer Care Associate on the CIAU could also benefit from gaining skills on receiving disclosure such as building rapport with the reporter - a useful reference for this is the Keeping Children Safe curriculum for investigators described [here](#).

5. Embedding safeguarding in Bridge's culture even more deeply: Providing a high quality education is a performance indicator at Bridge to which all employees contribute, and we would like to recommend that safeguarding children be highlighted in the organisation's work, making it clear that all employees contribute to ensure the organisation's impact in child safeguarding -- not only Schools Department & academy staff. To promote a culture of child safeguarding and it being everyone's responsibility within Bridge, Bridge should incorporate safeguarding reminders into regular company gatherings such as town halls & company summits, with the same emphasis that is given to learning gains for children. The emphasis should of course be adjusted depending on how closely the employee interacts with the schools and level of access to children.
6. Bridge should consider other 'out of the box/innovative' interventions to help girls that are disproportionately affected by abuse. One of the unusual solutions we implemented for an organisation working with vulnerable girls was to provide them with 3 basic necessities including a mirror, comb, or lotion/vaseline because from a previous surveys with the girls, they had mentioned that they got boyfriends to buy things, such as food but interestingly repeatedly mentioned needing mirrors, combs & lotion to boost their self esteem. By providing these things to the girls, the intervention aimed to remove the need for girls to have boyfriends/sugar daddies. There are non-profits that have similar interventions such as providing free sanitary towels, with the aim to help adolescent girls afford basic necessities. We'd like to recommend that Bridge identify and work closely with partners like this to tackle the abuse of girls.

6 - Appendix

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II: Key interviewees

Name	Responsibility
Doreen Nabaho	Chief of Staff
Faith Kibui	People Operations Manager
Reuben Wambugu	Acting Country Director & Schools Director
Fred Seda	Operations Director
Antony Mugodo	Legal Director
Henry Were	Regional Manager
Stephen Abade	Regional Manager
Lillian Wamuyu	Schools Supervisor-Nairobi
David Nanzai	Academy Manager-Kingston
Vitalis Linyala	Academy Manager- Gicagi
Zipporah Muthina	Super Mama, Kingston Village
Janet Muthoni	Super Mama, Kingston Village
Katie Estabrook	Manager, Leadership and Development
Rebecca Bernstein	Academics Department, Shared Services
Virginia Muange	Academics Department, Shared Services
Name withheld	Grade 5 female teacher in a government school in Nairobi County with over 15 years teaching experience.
Name withheld	TSC employee, Gender Focal Point

III: Summary of literature used to benchmark incidence rates

Reference paper 1: Michael Baiocchi, Rina Friedberg, Evan Rosenman, Mary Amuyunzu-Nyamongo, Gabriel Oguda, Dorothy Otieno, Clea Sarnquist. 2019. [Prevalence and risk factors for sexual assault among class 6 female students in unplanned settlements of Nairobi, Kenya: Baseline analysis from the IMPower & Sources of Strength cluster randomized controlled trial](#)

Type of study design	Cluster-randomized trial (CRT)
Year	2019
Research institution(s)	Stanford University
Locations studied	Dandora, Huruma, Kibera, Korogocho, Kariobangi, and Mukuru).
Sample size studied & gender	4125 girls
Age range of children studied	10-14 years
Grade	6
Types of schools	Primary schools
Number of schools studied	95 schools
Sexual assault	Any unwanted sexual act
Rape	Sex against one's will
INCIDENCE RATE OF SEXUAL ABUSE OF GIRLS BY TEACHERS	
Sexual abuse = all abuse	11% sexually assaulted in the past 12 months by <u>all abusers</u>
INCIDENCE RATE OF RAPE OF GIRLS BY TEACHERS	
Rape = defilement	7.2% raped in the past 12 months by <u>all abusers</u>
PREVALENCE OF RAPE OF GIRLS BY TEACHERS	
Rape = defilement	9.9% raped at least once in their <u>lifetimes</u> = 412 girls <ul style="list-style-type: none"> 65.7% are raped by boyfriends = $65.7\% \times 9.9\% = 6.5\%$ 3.8% are raped by authority figures = $3.8\% \times 9.9\% = 0.379\%$

Reference paper 2: Control group only: Michael Baiocchi, Benjamin Omondi, Nickson Langat, Derek B. Boothroyd, Jake Sinclair, Lee Pavia, Munyae Mulinge, Oscar Githua, Neville H. Golden, and Clea Sarnquist. (2017) [A Behavior-Based Intervention That Prevents Sexual Assault: The Results of a Matched-Pairs, Cluster-Randomized Study in Nairobi, Kenya](#)

Type of study design	Cluster-randomized study (specifically, data from the control group)
Year	2017

Research institution(s)	Stanford
Locations studied	informal settlements of Nairobi, Kenya
Sample size studied & gender	2827 girls
Age range of children studied	10-16 in grades 5 - 8
Grade	Grades 5 - 8
Types of schools	Primary schools
Number of schools studied	16
INCIDENCE RATE OF RAPE OF GIRLS BY TEACHERS	
Rape = defilement	<p>6.4% had been raped in the previous year by <u>all abusers. number of incidences did not change since they were a control group</u></p> <p>The girls were asked who had forced them, and gave the responses below</p> <ul style="list-style-type: none"> • 32% forced by boyfriend • 5% forced by an authority figure
PREVALENCE OF RAPE OF GIRLS BY TEACHERS	
Rape = defilement	8.1% had been raped at least once in their lifetimes by all abusers

Reference paper 3: [Sara Jerop Ruto \(2009\). Sexual Abuse of School Age Children: Evidence from Kenya](#)

Type of study design	Cross sectional
Year	2009
Research institution(s)	Kenyatta University
Locations studied	10 districts
Sample size studied & gender	<p>The total number of respondents in the study=1749 children (1171 girls and 578 boys)</p> <p>However, the respondents for key questions varied. this paper will only make reference to data from 1,279 (who responded to questions on sexual harassment) and 1,206 children (who responded to questions on unwanted sex (two thirds being girls)</p>
Age range of children studied	10 - 18 years
Grades	Not focused on a specific grade. Only ages given
Types of schools	52 primary and 18 secondary schools
Number of schools studied	70 schools
PREVALENCE OF INDECENT ACTS BY TEACHERS	
'Sexual harassment' = indecent acts	16.1% of girls affirmed they had been propositioned by teachers.

PREVALENCE OF DEFILEMENT	
'Unwanted sex' = defilement	<p>n = 1,206 ;</p> <ul style="list-style-type: none"> Overall = 25.7% 198 girls (of 802) affirmed that they had been forced to have unwanted sex = 24.6% 112 boys (of 404) affirmed that they had been forced to have unwanted sex = 29.1% <p>Perpetrators</p> <ul style="list-style-type: none"> The leading perpetrators were again peers of the children who led with 59%. The fact that the respondents identified them as either girl or boy friend denotes that there is an existing relationship and what transpired may be date rape. The second most cited perpetrators were strangers.
PREVALENCE RATE OF SUGAR DADDY RELATIONSHIPS WITH TEACHERS	
"Teacher-School Girl Relationships" = Sugar daddy relationships	<p>16.1% girls affirmed they had been propositioned by teachers. While the majority of girls either declined the "love proposals" or ignored them, 17.4% who yielded to the love proposal and entered into a relationship with the teacher.</p> <p>Prevalence = 16.1% x 17.4% = 2.8%</p>

Reference Paper 4: Parkes, J., & Heslop, J. (2011). [Stop Violence Against Girls in School: A cross country analysis of baseline research from Ghana, Kenya and Mozambique](#)

Type of study design	Cross-sectional Study
Year	2011
Research institution(s)	University of London
Locations studied	Nationwide
Sample size studied & gender	384 girls 192 boys
Age range of children studied	8-17 years
Grade	Grade 2 and above
Types of schools	Primary schools
Number of schools studied	16 Primary schools
Indecent Act	Peeping, touching Comments,
Sugar Daddy	Sex for goods
PREVALENCE RATE OF SUGAR DADDY RELATIONSHIPS WITH TEACHERS	
Sex for goods= Sugar daddy defilement	3.1% of girls reported of exchanging sex for goods

Reference Paper 5: [The crisis of sexual abuse of school children by Teachers in Kenya; A study of primary schools in Makueni District, Makueni County](#)

This does not have actual incidence rates, just perceptions of what these could be.

IV: Reference for converting prevalence to incidence rates

Using the 2 Baiocchi papers, we found the following on data they had on rape.

Incidence = 73.4% of prevalence rate

	Baiocchi Paper 1	Baiocchi Paper 2 (Intervention group)	Baiocchi Paper 2 (Control group)	Average
Incidence	7.2%	8.3%	6.3%	
Prevalence	9.9%	11.9%	8.1%	
Incidence = X% of prevalence	$x = 7.2/9.9 = 72.7\%$	$x = 8.3/11.9 = 69.7\%$	$x = 6.3/8.1 = 77.8\%$	x average = 73.4%

V: Reference files & all links used in this research

File	Description
Consulting Project Folder: [EXTERNAL] Folder for Consultant	Consulting Project Folder
Save the Children - Child Friendly version of the Child Protection Policy	A leaflet with a child-friendly version of Save the Children's child safeguarding policy. Save the Children's approach to child safeguarding is briefly yet clearly presented as an introduction for children
Plan International (2018) Child-Friendly Feedback Mechanisms: Guide and Tool	The guide is a step-by-step guidance and accompanying tool that supports teams to design and implement child friendly feedback mechanisms in collaboration with children, young people and communities.
Sample Safe recruitment checklist	A recruitment checklist will help evaluate whether you have the appropriate checks and procedures in place to screen out anyone who may be unsuitable to work with children. The following checklist is adapted from Save the Children's child safeguarding policy
Child Safeguarding Interview Questions	In an interview for a school-based post you should always ask questions about safeguarding, regardless of the role's level of contact with children.
KCS self assessment Tool	This self-assessment tool is an ideal way to measure how far (or near!) your organisation is from meeting the standards on making children safe, and where you need to improve.

VI: List of community & government organisations to work with on Child Safeguarding against sexual abuse

Type	Name	How they can help?	Counties they operate	Contact details/website
Government	Department of children Services	Provide services to children in need of care and protection	Nationwide	Website
Government	Childline Kenya	Toll free helpline(116) Whatsapp line- 0722116116	Nationwide	Toll free helpline(116) Whatsapp line- 0722116116
Government	National Police	Response during abuse	Nationwide	Hotline Numbers: 999 112 911
Makueni County Government	Makueni Safehouse	Safe house	Makueni County	
NGO	Gender Violence Recovery Center (GVRC)	Free medical treatment and psychosocial support for sexual abuse survivors.	Nairobi County	Website Emergency Contacts: 0709667000 or 0719638006
NGO	Maisha Safe house	Safe house	Nairobi, Pumwani	Website
NGO	SHOFCO	Medical Care	Kibera and Mathare	Website
NGO	Wangu Kanja Foundation	Paralegal Services	Nairobi	Website

VII: Membership & Responsibilities of the CIAU

The Child Protection Officer is responsible for investigating cases, advised by the CIAU

Dep't	Summary of role in CIAU	Representatives KE
People	1) Carrying out investigations to confirm if the violation that was reported took place or not through calls/ academy visits 2) Ensure the CIAU membership information is kept up to date 3) Ensure that all new CIAU members receive training	<i>People Operations Manager & the Delegated Child Protection Officer</i>
Legal	Ensuring that the violation is reported to the police immediately and OB number obtained and shared. Also following up to ensure that the culprit is arrested. Advising the team on the ground on the next legal steps to take.	<i>Paralegal & Director, Legal</i>
PR	Due to sensitivity of the situation it is imperative that PR manages any comms/ responses going out to the public & within Bridge	<i>PR Director</i>
Schools	Reaching out to the parent with the aim of ensuring that the pupil (victim) visits the hospital immediately for testing and treatment and ensuring the matter is reported to the police. Also advising the parent on the possible outcomes to ensure they are cooperating fully if not. Following up with counselling services i.e guiding/ connecting the parent and / or academy staff/ supervisor to the nearest counselling services for the pupil and / or parent if need be.	<i>Officer, Schools</i>
Operations	Ensuring that critical details of sexual abuse cases are accurately captured and logged in the ticketing system. Accurate logging of tickets helps to trigger red flags that immediately inform the CIAU of an abuse incident. *Operations also contacts child helplines (e.g ChildLine Kenya)	<i>Associate, Customer Care</i>

VIII: Detailed Bridge Benchmarks against Keeping Children Safe (KCS) Standards

1 - KCS Standard 1 - Policy

Table 1 : Assessment of Bridge policies against the KCS Child Safeguarding Standard 1: Policy

KCS Indicators	Safeguarding Procedure	In place	Partly Done	Not in Place	Comments
Policy 1. The organization has a written child safeguarding policy, approved by the relevant management body, to which all staff and associates (including partners) are required to adhere.	Bridge has a written CP policy that is approved by the Head of School and the Board.	❖			Bridge has put in place a robust safeguarding Policy that outlines Bridge's position on child protection issues in relation to all Staff and visitors
	The school has developed and adopted a Whistleblowing Policy and Procedure to foster a culture of disclosure without any fear of reprisal or victimization.	❖			Available in as part of the CP policy
	Where the schoolwork's with partner organizations, the CP policy should state minimum child protection requirements expected from partners.	❖			CP requirement well defined to partners
	The CP Policy outlines the role of the CP lead and team members, including names and contact details for each.	❖			Role of the CP leads is well defined and articulated in the policy.
Policy 2. The UN Convention on the Rights of the Child and other Conventions and legal Guidelines pertaining to children informs the policy of the organization	Bridge Policies includes a values statement about the rights of each child that aligns with the United Nations Convention on the Rights of the Child (UNCRC) and the African Charter on the Rights & Welfare of the Child and Kenyan children's act	❖			The CP policy explicitly mentions international and local Legal instruments on the rights of children.

	Bridge is aware of the legal, social welfare and child protection arrangements of the country in which the school is situated. These are reflected in the CP policy	❖			Value statement not clearly highlighted.
Policy 3. The policy is written clearly and easily understandable and is publicized, promoted and distributed widely to all relevant stakeholders, including children	The CP policy is promoted and publicly available to all school personnel and parents.		❖		Policy only available to staff on provided tablets but not publicly available for parents. However Parents of all new pupils sign a 'Parent Agreement' that is referenced in the CP Policy
	The CP Policy is available on the school website. State the URL.			❖	No CP policy identified on their website
	The school has a child friendly version of the CP policy that is written in clear, easy to understand language and is available to all students.			❖	No child friendly version available for students .
	The CP policy has been translated into the local language(s).			❖	Only available in English
	All school Board members, administration, teachers and support staff and volunteers are aware of the school CP policy, procedures and their responsibilities under the policy as evidenced by a signed acknowledgement form in each staff member's file.	❖			CP policy available to all staff and board members electronically
Policy 4. The policy is clear that all children have equal rights to protection and that some children face risks and difficulties in getting help, because of their ethnicity, gender, age, religion or disability, sexual orientation.	The CP policy appropriately defines child abuse, including physical, emotional, and sexual abuse, sexual exploitation, neglect and commercial exploitation and inappropriate behavior of children towards other children	❖			Key definitions are well stipulated in the policy

Policy 5. The policy addresses safeguarding children from harm through misconduct by staff, associates, and others, from poor practice, and from its operational activities where these may harm children or put them at risk due to poor design and/or delivery, for example.	The school has developed and adopted a Code of Conduct and written guidelines for appropriate and inappropriate behavior of adults toward children and children towards other children.	❖			Available as part of the CP policy
	Copies of the Code of Conduct are made available to all personnel, volunteers, parents, and the broader school community.		❖		Available to staff and teachers but not to parents and community
Policy 6. The organization makes clear that ultimate responsibility for ensuring the safety of children rests with senior executives (CEO and Directors) and managers.	The school has identified a Senior staff Member for child protection	❖			Bridge has defined responsibilities for senior staff members in child protection
	The Policy is subject to an annual, scheduled review and revision. State the date of the last review/revision.	❖			Reviewed Annually 23 rd July 2019
	The CP Policy outlines the role of the CP lead and team members, including names and contact details for each.	❖			Role of the CP leads is well defined and articulated in the policy.

2 - KCS Standard 2 - People

Table 2: Assessment of Bridge policies against the KCS Child Safeguarding Standards 2: People

KCS Indicators	Safeguarding procedure	In place	Partly Done	Not in Place	Comments
Policy 1. Recruitment processes have strong child safeguarding checks in place. Recruitment advertisements,	Bridge recruitment procedures include: A statement about the school CP policies in vacancy announcements. Interview procedures include question(s) to all candidates on CP	❖			Child Safeguarding procedures and requirements well articulated in the CP policy or recruitment guidelines

interviews and contracts all outline a commitment to child safeguarding	Bridge leadership ensures that background and relevant checks and evaluations are conducted on all paid staff and volunteers.	❖			Well-articulated in the safe recruitment guidelines
	Bridge has recruitment policies and procedures that ensure all employees and volunteers are of sound moral character and are suitable people to work with children and young adults.	❖			Though Bridge has thorough and standardized recruitment processes as outlined in their CP policy.
	Bridge undertakes background and criminal history checks for contractors, vendors, consultants, and others who provide goods and services to the school or who bring minors onto school property	❖			Bridge conducts background search in any sex offenders register or list provided by authorities of “blacklisted Teachers” (if authorities do make this information available under applicable laws).
Policy 2. The organisation is open and aware that when it comes to child safeguarding matters, issues can be easily identified, raised and discussed. All members of staff, volunteers and associates have training on child safeguarding	The school has a scheduled program of regular, systematic professional training for: Board members, School leaders, Teaching Staff, support staff (eg. drivers, security, gardeners, cooks, etc.), Volunteers, Contractors, Parents & carers on CP including child abuse prevention, recognition, intervention and reporting. All staff understand their role as mandatory reporters and the reporting pathways available. Cite the date of training for each of the above groups. A school CP training register provides evidence of training for each member of staff (incl. date and curriculum details)		❖		Bridge school staff are aware of their safeguarding obligations and responsibilities in line with their roles. However, staff training on Child Safeguarding is not systematic across all staff
Policy 3. Children are made aware of their right to be safe from abuse, and are provided with advice and support on keeping themselves safe, including information for children, parents/carers about where to go	The school has in place formal education program for all students that are inclusive of, but not limited to Personal safety • Staying safe away from school & home • Bullying • Physical abuse, neglect & negligent behavior • Manipulation & grooming • Healthy sexual behavior • Consent • Sexual harassment • How to disclose abuse or neglect	❖			Child safeguarding awareness well integrated in school programs including curriculum and life skills programs

	Parent information session(s) and other communication is provided regarding the school's child protection and safety education program. Their feedback is sought, and parents know who to contact in the school if there are any child protection/safety concerns.	❖			Bridge provides platforms necessary for sensitisation parents for parents on Child Safeguarding
Policy 4. The organisation designates key people at different levels (including at Director level) as "focal points" with clearly defined responsibilities, to champion, support and communicate on child safeguarding, and for effective operation of child safeguarding:	Bridge has a designated leader for CP. Their role and responsibilities are articulated in the CP policy and made known to all staff.	❖			The Bridge Child Protection Policy designates the People Operations Director as the Child Protection Officer
	The CP lead is supported by a team, each with designated roles.	❖			The Child Protection Officer depends on the Critical Incident Advisory (CIAU) unit, which is an interdepartmental committee that ensures that the step-by-step process to investigate an abuse case is followed.
	A process is in place to cover the CP lead when they are absent from school. At all times, staff are kept informed on who the designated Child protection lead is.	❖			There is a teacher on duty (refer to Bridge Teacher on Duty protocol here) who acts as CP lead when Manager is away and is displayed in the managers blackboard.
Policy 5. Partner organisations are required and supported to develop minimum child safeguarding measures appropriate to their organisation.	Bridge participates in a multidisciplinary team or network with other schools, government, and non-government agencies.	❖			Bridge takes part in all local Education activities at local and regional level
Policy 6. There are written guidelines for behaviour (Code of Conduct) that provide guidance on appropriate/expected standards of behaviour of adults towards children and of children towards other children	All new employees receive training on the school CP Policy and Code of Conduct as part of the school induction process. Signed copies are included in each member of staff's file.	❖			During the induction process all Bridge trains new staff on child protection issues in order that they understand Bridge's guidelines on contact with children.

3 - KCS Standard 3 - Procedures

Table 3 : Assessment of Bridge policies against the KCS Child Safeguarding Standards 3: Procedures

KCS Indicators	Safeguarding Statements	In place	Partly Done	Not in Place	Comments
Policy 1. The organisation requires local mapping exercises to be carried out that analyse the legal, social welfare, and child protection arrangements in the contexts in which it works.	Effective external relationships have been established by the school to provide support and guidance on matters related to child protection	❖			School has established partnerships and links with service providers within their communities that support survivors of abuse. These include NGOs, police, community leaders and the relevant government offices like the children officers.
Policy 2. There is an appropriate process for reporting and responding to child protection incidents and concerns that fits with the local systems for dealing with incidents of child abuse (as identified in the mapping exercise):	All school Board members, administration, teachers, support staff and volunteers know when and how to respond appropriately if children are harmed or if allegations of harm to children are made.	❖			This information is clearly stipulated in the CP policy and procedures and the employee handbook.
	Has school leadership kept the school and its constituents informed? Has the school provided or facilitated outreach to affected persons or groups?	❖			The People team shall investigate all possible leads on who could be the most appropriate person to care for the child and ensure his/her wellbeing and safety, including contacting alternative family members, contacting the head of the Board of Management for the School or the community leader to inform them of the situation and ask for support for the child's wellbeing.
	The school has developed structured procedures for reporting suspected or disclosed abuse or maltreatment. This includes a formal policy identifying actions to be taken,	❖			CP policy clearly stipulates the process and persons responsible once an allegation is reported. The People team is responsible for conducting an inquiry once an incident is reported. This is done in collaboration with the relevant stakeholders, subject to the guidance provided under this Policy and the applicable local laws.

	including informing appropriate authorities.				
Policy 3. The identification and mitigation of child safeguarding risks is incorporated into risk assessment processes at all levels, from identification of corporate risks through to planning an activity involving or impacting on children.	School facilities are designed and utilised in a way that promotes child safety and protection.	❖			The schools are constructed in a way that anyone can clearly see whatever is happening in the classrooms. The Academy Managers offices are placed at a vantage point where they can easily see and access the classes in case of an emergency. A visit to a model school Kingston Village showcased the above.
Policy 4 Adequate human and financial resources are made available to support development and implementation of child safeguarding measures.	Adequate human and financial resources have been allocated by the school to support and promote child protection and safeguarding	❖			Resource allocation towards supporting survivors is clearly demonstrated in Bridge policies
Policy 5. There are clear procedures in place that provide step-by-step guidance on how to report safely which are linked to the organisation's disciplinary policy and procedures:	Procedures for reporting concerns should include that any verbal communication should promptly be recorded.	❖			Reporting procedures well defined and staff are aware of their role in each step, through the customer care to CIAU
	The school should allocate an identified single location for the delivery of CP forms and a clear method of alerting the CP lead of all concerns or allegations.	❖			Bridge has put in place a centralized customer care platform under the operations department where once an incident is reported it automatically activates the CIAU for response.
	The school has developed a procedure for suspected or disclosed abuse when the claim is made against the CP Lead or the Head of School. This is included in the CP Policy.	❖			Bridge has a zero-tolerance policy on abuse instigated by all staff

Policy 6. Child safeguards are integrated with, and actively managed into existing business processes and systems (strategic planning, budgeting, recruitment, programme cycle management, performance management, procurement, and so on) to ensure safeguarding children is a feature of all key aspects of operations.	The school's commitment to child protection is reflected in all school procedures and systems (eg. strategic planning, budgeting, recruitment, performance management, partner agreements, risk management, etc.)	❖			Child Protection is well integrated in Bridge policies and procedures.
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4 - KCS Standard 4 - Accountability

Table 2 : Assessment of Bridge policies against the KCS Child Safeguarding Standards 4: Accountability

KCS indicators	In place	Partly done	Not in place	comments
Policy 1. Arrangements are in place to monitor compliance with, and implementation of, child safeguarding policies and procedures through specific measures and /or integration into existing systems for quality assurance, risk management, audit, monitoring and review	❖			Structures are in place for both monitoring response of reported allegations and monitoring of safeguarding processes.
Policy 2. There is a system of regular reporting to key management forums, including director level, to track progress and performance on child safeguarding, including information on safeguarding issues and child protection cases	❖			Reporting structures are in place to ensure management is informed on new and ongoing safeguarding issues
Policy 3. External or independent bodies such as boards of trustees, oversight committees are used to monitor performance in this area and hold senior executives to account in relation to child safeguarding	❖			CIAU in place to provide oversight on safeguarding processes and implementation and monitoring of safeguarding implementation, quarterly review by executive leadership team as well. Board Committee established to provide additional oversight.

Policy 4. Opportunities exist for learning from practical case experience, and this to be fed back into organisational development	❖			Bridge has in place an efficient documentation process.
Policy 5. Policies and practices are reviewed at regular intervals and formally evaluated every three years	❖			Policies and procedures reviewed annually
Policy 6. Progress, performance, and lessons learned are reported to key stakeholders (management forums and external or independent bodies where relevant) and included in your organization's annual reports	❖			Stakeholders regularly updated on progress of safeguarding implementation through reports.

IX: Test of the veracity of the TSC Online service

[According to TSC records](#), teacher TSC Number 532787 ie Reuben Muringi was deregistered in March 2020, but still appeared as a registered teacher in the [online system](#) - screenshot below dated 21 Aug 2020

The screenshot shows the 'CHECK REGISTRATION STATUS' page of the Teachers Service Commission of Kenya Online Services. At the top, there is a header with the TSC logo and the text 'TEACHERS SERVICE COMMISSION OF KENYA ONLINE SERVICES'. Below this, a search bar prompts the user to 'Enter TSC No, ID/Passport No'. A 'Search' button and a 'Go Back Home' button are located below the search bar. The main content area displays the registration details for Reuben Musyoka Musyoka. It includes his name, post (60216 10), town (marimanti), email (532787), and permanent address (Post: 10, Code: 60215, Town: marimanti). It also shows his ID No. / Passport No. as 20332208 and his registration status as 'Registered TSC NO 532787'. A 'Print' button and a 'Reset Remarks History' link are also visible.

TEACHERS SERVICE COMMISSION OF KENYA ONLINE SERVICES

CHECK REGISTRATION STATUS

Enter TSC No, ID/Passport No

Search Go Back Home

TEACHERS SERVICE COMMISSION OF KENYA ONLINE SERVICES

Date: 20-08-2020

Reuben Musyoka Musyoka
Post: 60216 10
Town: marimanti
Email: 532787

Permanent Address
Post: 10
Code: 60215
Town: marimanti

ID No. / Passport No: 20332208
Registration Status: Registered TSC NO 532787

Print

Reset Remarks History

