

IPA Global Safeguarding Policy

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Terms and Definitions

Abuse: Knowingly engaging in any action or inaction that has the potential to harm another person, including, but not limited to, the following:

- **Physical Abuse:** The use of physical force that causes actual or likely physical injury or suffering (e.g., hitting, shaking, burning, female genital mutilation, torture).
- **Emotional Abuse:** Any humiliating or degrading treatment such as name-calling, constant criticism, belittling, persistent shaming, solitary confinement, and isolation.
- **Sexual Abuse:** All forms of sexual violence, including incest, early and forced marriage, rape, sex without valid consent, involvement in pornography, and sexual slavery. Child sexual Abuse may also include indecent touching or exposure, using sexually explicit languages towards a child and showing children pornographic material.
- **Exploitation:** The actual or attempted misuse of a position of vulnerability, power differential, or trust for the benefit of the individual leveraging their position, power, privilege, or wealth (through enticement, manipulation, coercion, or trickery). Exploitation may take many forms including forced labor and forced criminality.
- **Sexual Exploitation:** Any actual or attempted misuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. This includes exchange of assistance due to beneficiaries or participants in IPA projects. The sexual exploitation of a child who is under the age of consent is child sexual Abuse and a criminal offense.
- **Neglect:** A deficit in meeting the basic needs of a Child or Vulnerable Adult when a parent or guardian is capable of meeting those needs, including the failure to provide adequate supervision, health care, clothing, or housing, as well as to meet other physical, emotional, social, educational, and safety needs.

Award: A legally binding agreement that codifies the transfer of funds from one entity to another to perform specific tasks or projects under certain terms and conditions (an award-funded activity), and which includes consulting agreements, professional services agreements, contracts, grants, and purchase orders.

Child: A person younger than 18 years of age, irrespective of local country definitions of when a child reaches adulthood.

Contract: (1) A binding agreement for the procurement of goods or services for the benefit of the party providing the funding; or (2) a binding agreement for the contracting of programmatic and/or research services for the benefit of the party providing the funding, which typically is a fixed-price contract or cost-reimbursable contract.

Country Director (CD): The lead manager of an IPA Country Office, who might have the title of Country Manager or some other title indicating their leadership role in the Country Office.

Donor entity: A funder of an awarded project or programmatic activity; an awarding agency or institutional donor; a funding source; an institution that funds activity that is separately budgeted and accounted for according to the terms the institution lays out in an award agreement.

Employee: A person or people who hold employment agreements with IPA.

Grant: An award, which is for the benefit of a third party, for the purpose of performing a project or research activity, as documented in a grant agreement with terms and conditions.

Project: A distinct programmatic or research activity funded by one or more awards and donor entities that has specified expected results, timeframe, and budget, headed by a Project Lead.

<p>Project Lead (PL): The person responsible for directing a project and serving as Budget Holder, and who might have the title of Research Manager or some other title indicating their leadership role for a project.</p>
<p>Representatives: Volunteers, interns, consultants, members of the Board of Directors, Subrecipients, contractors, subcontractors, partners, Principal Investigators (PIs), and others who work with Children or Vulnerable Adults on IPA's behalf or visit IPA projects, or who have access to sensitive information about Children or Vulnerable Adults in IPA's projects.</p>
<p>Safeguarding: The practice of implementing preventative, protection, and compliance measures to protect the health, wellbeing, and human rights of all people, enabling them to live safely and free from Abuse and neglect. Safeguarding includes the actions taken by organizations to ensure their staff, operations, and programs do no harm to Children and Vulnerable Adults nor expose them to Abuse or exploitation.</p>
<p>Staff: A person or people who hold employment agreements with IPA, also referred to as employees, as opposed to non-staff, who may also be referred to as non-employees. Includes Global staff, also known as U.S.-paid staff, and local staff (Country Office hires).</p>
<p>Subaward: An award provided to a Subrecipient to perform part of an award's scope of work, and which transfers a portion of the resources to the Subrecipient as documented in a subagreement (for the subaward, subgrant, or subcontract).</p>
<p>Subcontract: A legally binding agreement provided to a Subrecipient to perform part of a contract as documented in a subagreement (for example, a subgrant or subcontract).</p>
<p>Subcontractor: An entity that receives a contract by which the procurer purchases goods or services necessary for the performance of another's contract.</p>
<p>Subrecipient: A legal entity to which an award recipient makes a subaward to perform part of an award-funded activity, and which is accountable to the award recipient for the use of the funds provided. Can also be referred to as a subawardee or, depending on the nature of the award, as a subgrantee or subcontractor.</p>
<p>Trafficking in Persons: A crime whereby traffickers exploit and profit at the expense of adults or children by compelling them to perform labor or engage in commercial sex.</p>
<p>Two-Adult Rule: A rule wherein two or more adults supervise all activities where children are involved and are present at all times.</p>
<p>Vulnerable Adults: People 18 years or older who experience vulnerability because they are unable to take care of or protect themselves against significant harm or serious exploitation; or due to their gender, mental or physical health disability, race, creed, color, religion, national or ethnic origin, age, sexual orientation, gender, or any other factor or status deemed to place them at risk; or who are in a situation of subordination and therefore experiencing a power differential putting them at risk.</p>

IPA Global Safeguarding Policy

Purpose

Innovations for Poverty Action (IPA) employees and its Representatives, especially those engaged in the implementation of field activities, may come into contact with children and vulnerable adults that are especially susceptible to harm. It is the responsibility of IPA and its staff to not put people, including children and vulnerable adults, in a position of potential harm and/or cause them harm. It is imperative therefore that all IPA employees and Representatives understand what they can do to safeguard the people they come into contact with through their work with IPA, prevent and report Abuse in all forms, and recognize every individual's need for safeguarding and protection. (See [Terms and Definitions](#) for specificity on the terms used in this purpose statement.)

The purpose of this policy is to define IPA's approach to safeguarding, to articulate IPA's safeguarding requirements which are mandatory for all staff to follow and adhere to, and to document IPA's protocol for reporting safeguarding Abuses and violations. IPA's [Code of Conduct and associated policies](#) - including the Anti-Discrimination and Anti-Harassment Policy, Whistleblower Policy and Procedure, Combating Trafficking in Persons Policy, and Global Safety and Security Policies and Procedures - complement this policy and describe additional requirements for IPA staff in support of this policy. Harassment or Abuse against an IPA employee is covered by IPA's Anti-Discrimination and Anti-Harassment Policy.

Applicability

This policy applies to all IPA employees and Representatives and others who work on IPA's behalf with or around children and/or vulnerable adults or visit IPA projects, or who have access to sensitive information about children and/or vulnerable adults participating in IPA's projects. Adherence to this policy must also be applied in all (sub)awards, (sub)agreements, and (sub)contracts that are issued by IPA and funded by the U.S. government (USG), the UK Foreign, Commonwealth and Development Office (FCDO), and other donor entities with similar requirements.

IPA's Global Safeguarding Policy considers any person under the age of 18 is considered to be a child and is considered "underage," regardless of the legal age of consent of the country in which the child lives and/or in which the offense occurs.

Roles & Responsibilities

All IPA employees and Representatives are responsible for:

- Understanding and complying with the requirements of this policy
- Understanding what constitutes Abuse and the reporting requirements associated with such Abuse
- Reporting all suspected cases of Abuse and violations of this policy in accordance with the reporting requirements detailed in the [Reporting Abuse section below](#)

The **Chief People Officer (CPO)** is responsible for maintaining this policy and updating it as necessary. The CPO is responsible for ensuring that IPA's recruitment processes have appropriate screening procedures in place and that IPA's training requirements related to this policy are fulfilled. The CPO holds the responsibility for ensuring all reported cases of Abuse and other policy violations are properly investigated. The CPO tracks the handling of reported safeguarding cases as well as the outcomes of any investigation.

Country Directors (CDs) are responsible for ensuring that Country Office staff, consultants, volunteers, and interns receive a copy of and are trained on this policy according to the globally administered requirements. The CD is also responsible for the Country Office taking measures to raise awareness of IPA's codes of conduct, including safeguarding responsibilities, among partners and other Representatives. The CD is also responsible for ensuring the Country Office immediately informs the General Counsel/Chief Compliance Officer of any suspected Abuses or violations of this policy and for assisting as requested with reporting and investigation.

The **General Counsel** is responsible for referring all allegations of Abuse and other policy violations to the CPO who will be exclusively responsible for ensuring all cases are properly investigated.

The **Chief Global Programs Officer (CGPO)** is responsible for maintaining this policy and updating it as necessary. The CGPO is also responsible for maintaining a written model compliance plan ("Safeguarding Compliance Plan Template") and updating it as necessary. The CGPO is also responsible for providing safety, security, and safeguarding technical guidance in the development of Safeguarding Compliance Plans.

The **Project Lead (PL)** is responsible for ensuring that protocols for training enumerators and other project staff, mitigating safeguarding risks, monitoring compliance, and reporting concerns, allegations, and breaches are implemented as approved by the relevant Institutional Review Board(s) (IRBs). The PL is also responsible for taking measures to raise awareness of IPA's codes of conduct, including safeguarding responsibilities, among local partners, external principal investigators (PIs) engaging on site in IPA projects, and other local Representatives.

Where a Safeguarding Compliance Plan is required, the PL is responsible for its development, implementation, and maintenance. The PL is also responsible for immediately informing the General Counsel/Chief Compliance Officer of any suspected Abuses or violations of this policy and assisting as requested with reporting and investigation.

The **Global Grants & Contracts lead** is responsible for providing guidance and compliance oversight for Safeguarding Compliance Plans. This includes notifying the PL and any applicable Subrecipients when they are required to develop and implement such plans, and maintaining IPA's Safeguarding Compliance Plans with the official award documentation.

Policies

IPA is committed to conducting its research and operations in a manner that is safe for all people, especially those that are most susceptible to Abuse, including children and vulnerable adults.

It is IPA policy to ensure compliance with host-country and local child and vulnerable adult welfare and protection legislation or international standards, whichever gives greater protection, and with U.S. law where applicable, donor-entity requirements, human protection training for research personnel, and Institutional Review Board (IRB) review of research activities.

For research projects involving participants who may have been victims of Abuse, there are project-specific protocols that should be followed to minimize the risk of harm to the participant and the interviewer. The study design, which should include protocols for training enumerators, reporting requirements, and referral plans, must have IRB approval.

After IRB approval has been obtained and throughout the implementation of the study, IPA

and the PI hold final responsibility for ensuring the study is implemented according to the study protocol. Any person involved in the study can directly contact the IRB should they feel the PI is not upholding this responsibility.

It is the policy of IPA to comply fully with donor-entity safeguarding policies and laws and regulations applicable to the donor entity which are flowed down to IPA in implementing projects. This includes USAID's Protection from Sexual Exploitation and Abuse (PSEA), Counter-Trafficking in Persons (C-TIP), and Child Safeguarding policies and related requirements (see [Safeguarding at USAID: Partner Toolkit](#)), as well as FCDO's [Safeguarding against Sexual Exploitation and Abuse and Harassment \(SEAH\) Due Diligence guidance](#) and [Supply Partner Code of Conduct and terms and conditions](#).

IPA's standards, policies, and procedures will be consistent with the [Inter-Agency Standing Committee \(IASC\) Six Core Principles Relating to Sexual Exploitation and Abuse](#), [IASC Minimum Operating Standards on Preventing Sexual Exploitation and Abuse](#), the [International Child Safeguarding Standards](#), and the relevant SEAH elements of [The Core Humanitarian Standard on Quality and Accountability](#).

All IPA employees and Representatives are expected to conduct themselves in a manner consistent with the commitment and obligation of conducting its research and operations in a manner that is safe for all people.

Organizational Commitment

In line with [IPA's Values](#) and our commitment to safeguard all people, IPA commits to:

- Creating a safe, respectful and supportive culture that allows children and vulnerable adults, other program beneficiaries or participants, employees, and Representatives to thrive and feel secure while engaging with IPA, and supports people to understand, exercise their rights, and report any concerns
- Strengthening and cultivating the capacity of all employees and Representatives so they understand, and are supported in meeting, their safeguarding roles, responsibilities, and duty to do no harm
- Promoting safe practices, approaches, interventions, and environments which respect, recognize, and respond to the specific safeguarding needs and the different protection risks faced by children and vulnerable adults, including challenging and not tolerating inequality, discrimination, or exclusion
- Encouraging and facilitating all reports related to safeguarding
- Responding in a timely, effective, safe, comprehensive, procedurally fair, and confidential manner to all safeguarding complaints, allegations, and incidents, ensuring survivors' (or victims') perspectives, voices, and best interests are central to any efforts to prevent and respond to any safeguarding concerns and providing necessary support to survivors
- Zero tolerance to inaction on safeguarding reports and other violations of this Policy

Safeguarding Requirements

To safeguard all people and in line with IPA's [Code of Conduct](#), IPA employees and Representatives have a responsibility to:

- Understand IPA's Global Safeguarding Policy and be familiar with the protocol for reporting suspected cases of Abuse or suspicions of misconduct
- Conduct themselves in a manner consistent with this commitment and obligation of conducting research and operations in a manner that is safe for everyone involved
- Avoid engaging in any activity that may potentially result in any kind of Abuse
- Report suspected cases of Abuse and violations of IPA's Global Safeguarding Policy
- Obtain assent (agreement) from children and consent from their parent or guardian who is at least 18 years of age, as well as assent and consent from vulnerable adults

for all conversations, interviews, or requested actions, as well as for taking photos or video, audio taping, or other capturing of the person's likeness

Every IPA employee and Representative who engages directly or indirectly with children and/or vulnerable adults has a legal and moral duty of care to do all they can to protect children and vulnerable adults from harm. It is critical that any IPA employee who is in contact with vulnerable populations be aware of their safeguarding responsibilities to ensure that every child and vulnerable adult, regardless of their age, gender, religion, ethnicity, or other characteristic, is protected from harm.

Prohibited Activities

To safeguard all people, IPA employees and Representatives must not:

- Engage in Abuse or any activity that may result in any kind of Abuse
- Use language or act in a way that is physically or sexually provocative and inappropriate around children or vulnerable adults
- Place themselves in compromising or vulnerable positions with children or vulnerable adults
- Shame, humiliate, belittle, or degrade children or vulnerable adults
- Engage in or knowingly support or advance any sexual exploitation or exploitation including, without limitation, trafficking and child labor
- Exchange money, employment, goods, or services for sexual activity
- Engage in sexual relationships with beneficiaries or participants
- Subject a person to physical or emotional Abuse or neglect
- Undertake any activity for which a person's assent and parental/guardian consent is required without first obtaining the required assent and consent and without ensuring their safety and well-being during and after the activity

Representative Compliance

IPA requires all Representatives to comply with this policy. All Representatives are required to take steps to monitor, detect, and prevent Abuse or neglect. The requirements of this policy will be included in all (sub)awards, (sub)agreements, and (sub)contracts that are issued by IPA and funded by the U.S. government, UK FCDO, and other donor entities with similar requirements.

IPA requires Representatives to take all required and appropriate remedial and referral actions if any suspected Abuses relating to safeguarding have been found.

If any Representative fails to comply with the policy or applicable safeguarding requirements and standards, IPA will take appropriate action to remediate the violation and prevent future violations, and take all legally required and appropriate remediation action against the Representative which failed to take appropriate action (e.g., which in relation to volunteers and interns is disciplinary action including termination, and with Subrecipients, (sub)contractors, partners, external PIs, and other Representatives may include termination of the agreement/contract).

Compliance Plans

For all USG awards (grants, contracts, subcontracts, cooperative agreements, and subawards) whose total award amount exceeds USD500,000 ("Covered Agreements"), IPA will develop, implement, and maintain a written Safeguarding Compliance Plan that details specific safeguarding risk analysis and mitigation measures for that award's activities. IPA does not require a Safeguarding Compliance Plan for activities performed under USG awards valued at USD500,000 and below or awards from other donor entities, unless that donor entity requires such a plan. However, for all IPA projects, the project risk register should include any identified safeguarding risks along with the mitigating actions IPA will

take to manage those risks.

The CGPO will be responsible for working with the Global HR team to develop and maintain the IPA Safeguarding Compliance Plan Template and the associated standard processes and procedures for developing and implementing such plans.

The Safeguarding Compliance Plan Template will need to be adapted or modified for each Covered Agreement to ensure its appropriateness to the size, complexity, nature, and scope of the activities performed under the award. The Global Grants & Contracts team will notify the PL regarding the Safeguarding Compliance Plan requirements and provide guidance in their completion. The PL or designee will be responsible for creating the plan for that project, obtaining relevant approvals, and submitting it to the Global Grants & Contracts team, which will maintain the official version of the document with the official award documentation.

For USG-funded subawards issued by IPA to a Subrecipient, where the total subaward amount exceeds USD500,000 IPA will notify the Subrecipient Representative of this flow-down requirement and offer IPA's Safeguarding Compliance Plan Template as a tool. The PL is responsible for approving the Subrecipient's plan and submitting it to the Global Grants & Contracts team, which will ensure the Subrecipient's plan complies with USG requirements.

Zero Tolerance and Survivor-Centered Approach

IPA has zero tolerance for inaction on reports of safeguarding concerns and other violations of this policy. This means that IPA will act on all safeguarding concerns and allegations, ensuring that actions are timely, appropriate, and centered on the best interests of the survivor, taking into account their specific safeguarding needs and vulnerabilities.

All safeguarding concerns and allegations and breaches of this policy will be acted upon with the highest priority. Where investigations are launched, they will be carried out by experienced and qualified professionals who are trained on sensitive investigations and a survivor-centered or victim-centered approach. Such an approach must ensure the survivor's dignity, experiences, considerations, needs, and resiliencies are placed at the center of the process.

When a child or vulnerable adult is involved, IPA requires a "best interest of the child or vulnerable adult determination" for responding to alleged violations. This determination must consider the best possible outcome for a child or vulnerable adult who has been exposed to violence, Abuse, exploitation, or neglect.

IPA will refer incidents of a potentially criminal nature to law enforcement or relevant authorities only after taking into account the best interest assessment of a child survivor/victim and, in the case of adults, the wishes of an adult victim and the adult victim's guardian, if any, as well as the welfare and safety of all parties. Where mandated by local or national laws, IPA will report a potential crime to law enforcement or relevant authorities while also taking appropriate safety measures to manage the risks for all concerned.

All violations of this policy will be treated as a serious matter and will result in disciplinary action, up to and including employment termination for employees and any and all other available legal remedies for employees and Representatives.

Policy Implementation

Recruitment & Training

IPA will not knowingly hire anyone it learns has a child or vulnerable adult Abuse conviction and reserves the right to take appropriate disciplinary action against anyone found retrospectively to have a historical conviction, up to and including termination. Additionally, allegations of IPA employees involved in child or vulnerable adult Abuse during their employment with IPA will be reported and investigated, as permissible by local laws, and appropriate disciplinary action may be taken, up to and including termination.

During the application and/or interview phase of the recruitment process, applicants for positions involving interactions with children and/or vulnerable adults may be asked about previous work with these populations. Finalists for IPA's regular positions will be vetted with reference checks.

All IPA employees shall be directed to and receive training on IPA's Global Safeguarding Policy within the first 30 days of employment as part of their onboarding program and at least annually thereafter as part of IPA's required safeguarding compliance training. If the employee's role involves engagement with research subjects, the training must be completed prior to such engagement.

Preventing Abuse of Children and Vulnerable Adults

Employees and Representatives must obtain assent (agreement) from children and consent from their parent or guardian who is at least 18 years of age, as well as assent and consent from vulnerable adults for all conversations, interviews, and activities, as well as for taking photos or video, audio taping, or other capturing of the person's likeness. When possible and appropriate, and where required by applicable law (e.g., data protection law) or IRB requirements, the assent/consent must be in writing. When not required by applicable law or IRB requirements, assent/consent should still be obtained as possible or appropriate.

Assent and consent must be obtained in circumstances that ensure the child/vulnerable adult and guardian are not coerced or pressured in any way and understand that they are part of a story that might be disseminated locally and globally. This is usually ensured only if the assent/consent is obtained in the child's/adult's language.

Where possible and practical, the "two-adult" rule, wherein two or more adults supervise all activities where children are involved and are present at all times, should be followed. Where the "two-adult" rule is not possible, employees and Representatives will plan or organize the work or workspace involving children to minimize risks, including for example interacting with children in a location that is visible to others.

Reporting Abuse

IPA employees and Representatives must report:

- Any actual, suspected, or alleged Abuse or exploitation of any kind involving IPA employees, Representatives, and/or participants in IPA activities, based upon reporting requirements of IPA's Global Safeguarding Policy as well as local laws
- Any disclosure, concern, or allegation from a participant, employee, or Representative of Abuse, based upon reporting requirements of IPA's Global Safeguarding Policy as well as local laws
- Suspicions of violations of this policy

Employees and Representatives must report all suspicions, allegations of Abuse, and violations of this policy **as soon as possible**, ideally within 24 hours, to anyone in management whom the employee or Representative feels comfortable approaching. There is **no minimum level** for reporting a suspected incident, i.e., **any** concern of potential Abuse must be reported.

**IPA Whistleblower
Hotline**

www.lighthouse-services.com/poverty-action

Telephone: +1-844-837-5445

All managers must report all allegations, suspicions, and violations immediately to the General Counsel/Chief Compliance Officer, who will refer the case to the CPO for investigation.

Abuse and violations or suspected violations of this policy may be submitted on a confidential basis. Reports of violations or suspected violations will be kept confidential to the extent possible, although limited disclosure may be necessary in some cases to conduct an investigation or where compelled by law. If any employee or Representative does not feel comfortable reporting Abuse or policy violations to a manager or directly to the General Counsel/Chief Compliance Officer, a complaint may be anonymously submitted through IPA's whistleblower hotline (+1 844-837-5445 or www.lighthouse-services.com/poverty-action). The hotline is managed by a third-party provider who will not disclose the complainant's identity without the complainant's express permission.

For FCDO projects, in addition to the reporting options listed above, abuse and violations or suspected violations of this safeguarding policy may also be reported directly to FCDO at reportingconcerns@FCDO.gov.uk or on +44(0)1355843747.

Anyone filing a report of any Abuse or allegation of violation of this Safeguarding Policy must act in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the policy or Abuse.

Any employee or Representative who in good faith reports a violation of this policy or Abuse shall not suffer harassment, retaliation, or adverse employment consequences (in the case of an employee) as a result of that report. Any employee who retaliates against someone who has reported a violation or Abuse in good faith is subject to disciplinary action, up to and including termination of employment. Similarly, any Representative who takes retaliatory action may be subjected to termination of their agreement/contract with IPA.

Investigating Abuse

IPA takes every allegation of a violation of this Safeguarding Policy seriously. IPA employees and Representatives must cooperate fully with any investigation or inquiry by IPA or other parties, such as local authorities, if required. IPA employees and Representatives are required to preserve all records relating to any alleged violation of this policy.

Upon receipt of a reported safeguarding violation by an IPA employee or Representative, the General Counsel will refer the case to the CPO for investigation. The CPO will be responsible for ensuring the case is expeditiously and properly investigated.

An employee who allegedly violates this policy may be suspended from their position (without pay, if allowed under applicable law) during an investigation of the allegation. A staff member who is proven to have violated this policy or committed Abuse may be dismissed from their employment with IPA and be ineligible for rehire. Any alleged violator who it is proven did not violate this policy or commit Abuse will be reinstated to their position with

repayment of all compensation withheld during the suspension.

In the event an allegation is proven to be untrue or fabricated, appropriate steps will be taken for follow-up with the person who has been accused, the victim, and the person who made the accusation. Any IPA staff member who in bad faith makes false and malicious accusations will face disciplinary action, up to and including termination.

Notification to the U.S. Government

In the case of Covered Agreements, IPA will immediately inform the U.S. government whenever IPA receives credible information from any source that alleges that IPA, IPA's Representative, or any other person provided access to or contact with children, vulnerable adults, and other program beneficiaries or participants under the award has engaged in activities prohibited in this policy. Notification and additional information will be provided as per the instructions in the Covered Agreement's terms and conditions.

For USG-funded subawards issued by IPA to a Subrecipient, the Subrecipient must immediately inform IPA whenever the Subrecipient receives credible allegations of engagement in activities prohibited in this policy. IPA in turn will immediately notify the U.S. government as per the Covered Agreement's terms and conditions.

Monitoring Policy Compliance

IPA will monitor and evaluate compliance across all IPA operations with this policy's requirements and associated standards, policies, and procedures, as well as with applicable Safeguarding Compliance Plans.

Global HR will ensure IPA's recruitment processes have appropriate screening procedures in place, and will monitor fulfillment of IPA's training requirements related to this policy.

During project implementation, PLs will monitor day-to-day compliance by employees, Subrecipients, and other Representatives engaged in project activities, as well as by any other person provided access to or contact with beneficiaries or participants under the award. PLs will update their Safeguarding Compliance Plans, where applicable, as needed to fulfill the purpose of this policy.

Global HR will maintain a case register for tracking the handling of reported cases of Abuse and other policy violations throughout the process as well as the outcomes of any investigation.

Posting

IPA will make this Global Safeguarding Policy publicly available by posting it on its external website.