



**Independent
Accountability
Mechanism**

U.S. International Development Finance Corporation

IAM Assessment Report

Bridge International Academy Project, Kenya

20 July 2024

[Independent Accountability Mechanism/Office of Accountability \(IAM\)](#)

U.S. International Development Finance Corporation (DFC)

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About the IAM

The Independent Accountability Mechanism (IAM) — also known as the Office of Accountability — is an independent office within U.S. International Development Finance Corporation (DFC) that addresses concerns, complaints, or conflicts about environmental or social issues that may arise around DFC-supported projects. The office provides project-affected communities, project sponsors, and project workers an opportunity to have concerns independently reviewed and addressed. The IAM reports directly to DFC's Board of Directors. For additional information, visit [DFC's Independent Accountability Mechanism](#).

Purpose of IAM Assessments

Once a Request has been deemed eligible, the IAM will conduct an Assessment to develop a thorough understanding of the issues and concerns raised in the request, engage with the DFC Project team, the Requester, and the Client and, to the extent possible, Sub-Client, and other relevant stakeholders, to explain IAM's different functions, and determine whether the Parties seek to initiate problem solving or compliance review functions. The Assessment does not entail any judgment on the merits of the Request; rather, the IAM seeks to understand the facts and empower those involved to make informed decisions on how to address the issues raised.

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ACRONYMS

- BIA Bridge International Academy
CAO Compliance Advisory Ombudsman
CSA Child sexual abuse
CSO Civil Society Organization
DFC U.S. International Development Finance Corporation
IAM Independent Accountability Mechanism of DFC
IFC International Finance Corporation
OPIC U.S. Overseas Private Investment Corporation, DFC’s predecessor
SGBV Sexual gender-based violence

1. SUMMARY

On 12 July 2024, the IAM received a Request from a coalition of Civil Society Organizations (CSO) on behalf of several former pupils from the Bridge International Academy in Kenya (Bridge). The Requesters allege child sexual abuse (CSA) while in school, perpetrated by a teacher employed by Bridge, while DFC was an investor in the Project. After consulting with DFC's Management, the IAM Director determined the Request to be eligible on 7 August 2024.

The Requesters asked the IAM to engage and include them in the [on-going compliance review](#) of the Bridge Project, which was requested by DFC's CEO on 19 March 2024. OPIC/DFC's Bridge Project involved a \$10 million loan in 2013 to finance the expansion of low-income private schools in Kenya using a franchise model. DFC exited the Bridge Project in July 2022 as a result of early loan repayment by DFC's Client.

DFC's CEO request for the IAM to conduct a compliance review was in response to the publication of alleged sexual abuse at the Bridge Schools in Kenya disclosed by the International Finance Corporation (IFC), another investor in the Bridge School and/or its parent company, NewGlobe School. Since 2018, IFC's independent accountability mechanism, the Compliance Advisor Ombudsman (CAO), has received and continues to process numerous complaints related to the Bridge Project or NewGlobe School. The CAO's Compliance Investigation Report, dated October 3, 2023, details known CSA-related incidents involving 23 child survivors associated with Bridge. A related IFC Management report, dated 7 March 2024, confirms, for example, that, in 2016, IFC received information from Bridge about four cases of child sexual abuse and engaged Bridge about them.

In March 2024, following the IAM's disclosure of its initiation of a compliance review of the Bridge Project, the Group Managing Director, Bridge, based in Nairobi, Kenya, wrote to and invited the IAM for a meeting. The IAM's Director met with this representative in Nairobi to explain the IAM's functions and role with regard to the CEO-requested review, which is focused on DFC's compliance with its environmental, social, human rights, and labor rights policies.

The IAM Director notes that the Requesters are asking the IAM to engage and include them in the ongoing compliance investigation of DFC. The Requesters did not ask for and are not interested in pursuing problem-solving or mediation services. The IAM Director notes that Bridge is no longer a DFC Client. In accordance with the 2014 OPIC Handbook applied to this Request, it will be transferred to the IAM's compliance function.

2. BACKGROUND

2.1 The Project

The OPIC/DFC's Bridge Project, which is the subject of the Request, involved a \$10 million loan to finance the expansion of low-income private schools in Kenya using a franchise model. Additional information is contained in [OPIC/DFC's web-posted Project Information](#).

2.2 The Request

On 12 July 2024, the IAM received a Request from a coalition of Civil Society Organizations (CSO) on behalf of several former pupils from Bridge in Kenya. The Requesters, who asked for confidentiality, allege child sexual abuse (CSA) while in school, by a teacher employed by Bridge, while OPIC/DFC was still an investor. These former pupils request that the IAM engages and includes them in the IAM's [on-going compliance review](#) of the Bridge project. This on-going review was requested by DFC's CEO on 19 March 2024, following publication of alleged sexual abuse at the Bridge Schools in Kenya disclosed by the International Finance Corporation (IFC) and its independent accountability mechanism, the Compliance Advisor Ombudsman (CAO). The IAM Director determined the Request to be eligible on 7 August 2024.

2.3 Other Relevant Issues

Other key investors in Bridge or its parent company, NewGlobe School, included the IFC. It provided equity investments totaling approximately \$13.5 million. IFC's CAO, has received and processed numerous complaints related to the Bridge Project since 2018. The CAO's Compliance Investigation Report about the CAO Initiated Investigation of IFC's Investment in Bridge International Academies (Bridge-04), dated October 3, 2023, details known CSA-related incidents involving 23 child survivors associated with Bridge between 2013 to 2019. IFC's related Management Report and Management Action Plan, dated March 7, 2024, describes, for example, that in 2016, IFC received information from Bridge about four cases of child sexual abuse.

3. ASSESSMENT SUMMARY

3.1 Methodology

Once a Request has been deemed eligible, the IAM conducts an Assessment to develop a thorough understanding of the issues and concerns raised in the request, engage with the DFC Project team, the Requester, and the Client and, to the extent possible, Sub-Client, and other relevant stakeholders, to explain IAM's different functions, and determine whether the Parties seek to initiate problem solving or compliance review functions. The Assessment does not entail any judgment on the merits of the Request; rather, the IAM seeks to understand the facts and empower those involved to make informed decisions on how to address the issues raised.

In relation to the Request, the IAM's Assessment was informed by the following:

- On-going compliance review of the Bridge Project in response to DFC's CEO request
- On-going review of selected reports about the Bridge case published by the IFC and its CAO
- On-going review of DFC's internal records related to the Bridge Project
- On-going discussion with DFC's Project team
- In-person and virtual meetings with CSOs representing the Requestors in Kenya
- Communication and in-person meeting with a representative of the Bridge School in Kenya

- Virtual meetings with the IAM’s consultants with expertise in CSA and GBV

This report summarizes the views communicated to the IAM Director by the Requesters and a Bridge School representative, decisions taken, and next steps.

3.2 Summary of Views

Requesters’ perspective

The Requesters allege child sexual abuse and harassment by their teacher while attending one of the Bridge schools in Kenya, which OPIC/DFC was still an investor in the Bridge Project. They indicate that Bridge was aware of the sexual abuse cases but failed to adequately address the situation, assist Requesters to report the incidents to the police, and/or put in place the appropriate mechanisms to address CSA in their schools. They indicate that the harm to the Requesters has not been remediated, and they are interested in seeking redress through the IAM for the harm they suffered.

The Requesters ask to be involved in the ongoing compliance review of OPIC/DFC implementation of its policies and procedures in relation to Bridge, and ensure they receive appropriate remedy. The Requesters also ask for their identities and any other identifying information to be kept strictly confidential throughout the process. Their concerns relate to their potential stigmatization as survivors of sexual gender-based violence (SGBV), as well as for their personal security. The survivors wish that all communication in relation to this complaint be directed towards their CSO Representatives.

The Requesters seek the following remedies:

1. Include and engage the Requesters in the ongoing IAM investigation and future remedy discussions;
2. Provide financial compensation for the harm caused;
3. Provide financial support for counselling services to the Requesters and their guardians;
4. Provide fees and expenses for school and /or vocational training;
5. Support the Requesters to access justice in national courts, including by providing legal fees, safety measures, and by acting as observer;
6. Direct Bridge to bear responsibility and publicly acknowledge and apologize for the harm that it caused to the Requesters, and provide a remedial framework/policy for the same, including a framework to prevent and respond to risks of SGBV cases in their schools; and
7. Ensure that DFC Management heightens its oversight of its private sector investments in Kenya, by ensuring its clients have a SGBV policy, and actively monitor the implementation of such policy during the investment period.

Former DFC Client Perspective

The IAM notes that Bridge is no longer a DFC Client/Project (exit occurred in July 2022). In its 27 March 2024 letter to the IAM, and subsequent in-person meeting on 17 Juen 2024 in Nairobi, the Group Managing Director of Bridge based on Kenya highlighted the role of the organization in providing access to quality and safe educational opportunities for pupils from low-income backgrounds. The letter notes that, since founding in 2008, Bridge has maintained rigorous safeguarding polices and practices, prevention strategies, monitoring, and robust reporting mechanism, through investigation protocols and stringent accountability mechanism. The letter continues to say that these measures have resulted in schools which are significantly safer for children in their communities. The letter also notes that the IFC

and Bridge did not enter a confidentiality agreement to cover the IFC/MIGA-CAO work, and that IFC did not have awareness of sexual harassment or exploitation until CAO raised this concern with IFC in 2020. Bridge writes further that it is fully supportive of independent review of the IAM and committed to cooperate and facilitate all necessary processes.

4. ASSESSMENT CONCLUSION

The IAM Director notes that the Requesters are asking the IAM to engage and include them in the ongoing compliance review of DFC, which was requested by its CEO. The Requesters did not ask for and are not interested in pursuing problem-solving services. In accordance with the 2014 OPIC Handbook applied to this Request, it will be transferred to the IAM's compliance function.

The IAM will inform the Requestors, Management, the Board and DFC's former Client in writing about the outcome of the Assessment, which will also be published on IAM's webpage. This will be followed by an Appraisal of the Request by the IAM. The Appraisal report will include the IAM's decision whether or not to conduct a full compliance review, the reasons for that decision, and possibly observations and suggestions relating to the subject Project or to future Projects. If the IAM determines that a full review is warranted, the Appraisal report will outline its scope and approach.