

MEMORANDUM

To: Nick Allardice, CEO

From: Sarah Kayongo, VP of Programs

Date: March 21, 2025

Subject: Immediate Actions & Long-Term Safeguarding Reforms – DRC Incident Follow-up

Based on the GiveDirectly DRC fraud case, crisis management best practices, and referenced academic sources. I would undertake the following:

1. Goals:

- Prioritize safeguarding and protection of potential victims.
- Maintain organizational integrity and transparency.
- Prevent escalation of risks and maintain stakeholder trust.
- Ensure accountability and continuous learning.

2. Process and Steps:

Step 1: Immediate Acknowledgement and Transparent Internal Communication

- Convene an urgent crisis management meeting involving key leadership:
 - Global Safeguarding Team
 - Country Director for DRC
 - Legal Counsel
 - HR and Security Teams
 - Communications Lead
- Clearly state the allegations internally and document all known facts.
- Communicate to senior stakeholders that an investigation is underway.

Step 2: Assemble a Crisis Response Taskforce

- Team composition:
 - Safeguarding Team Lead (oversight)
 - Legal Counsel (adherence to laws)
 - Regional Director (local leadership)
 - Independent Investigator (external party, if feasible)
 - Communications Officer (managing stakeholder narratives)
- Division of responsibilities:
 - Safeguarding team: Define the scope of investigation.
 - Legal: Ensure compliance with DRC laws and international safeguarding protocols.

- Regional Director: Liaise with local authorities and community leaders.
- Communications: Prepare holding statements and updates.

Step 3: Remote Investigation Strategy

- Since physical presence is limited by conflict, deploy remote investigation methods:
 - Set up anonymous reporting hotlines and encrypted messaging lines for whistleblowers.
 - Engage local NGOs or trusted partners to gather verified field data.
 - Use satellite-based monitoring and community contact verification.
- Contract an independent safeguarding consultancy with DRC field knowledge.

Step 4: External Stakeholder Communication

- Prepare a transparent but cautious communication strategy for:
 - Donors (e.g., USAID, foundations)
 - Local government officials
 - Community leaders and local civil society organizations
- Use apology and corrective action language over denial.
- Commit publicly to a timeline for investigation updates.

Step 5: Risk Mitigation Actions

- Freeze new enrollments in the DRC program pending outcome of the investigation.
- Re-screen all enrolled recipients for validity and safeguarding concerns.
- Temporarily redeploy senior safeguarding and security personnel to regional offices bordering DRC for oversight.

Step 6: Long-Term Governance Strengthening

- Following findings, update safeguarding protocols and integrate an automated red-flag detection system into enrollment workflows.
- Strengthen community-based verification and establish permanent whistleblower partnerships with trusted local actors.
- Develop safeguarding scenario training simulations for field staff.

Summary of Team and Responsibilities:

Team Member: Safeguarding Lead Responsibility: Oversee investigation framework, coordination, and escalation process.

Team Member: Regional Director (DRC) Responsibility: Liaison with local government and community stakeholders.

Team Member: Legal Counsel Responsibility: Ensure compliance with safeguarding law and documentation integrity.

Team Member: External Investigator Responsibility: Conduct independent fact-finding and victim interviews.

Team Member: Communications Officer Responsibility: Manage internal and external messaging and donor updates.

Team Member: HR Team Responsibility: Support victim care, referral services, and future hiring screening.

Team Member: Data and Tech Team Responsibility: Monitor digital reporting channels and fraud detection tools.

Conclusion of my actions:

- Act swiftly, transparently, and with victim protection at the core.
- Avoid denial; instead, show ownership and corrective intent.
- Use multi-channel communication and adapt crisis management techniques for on-the-ground realities.
- Embed lessons learned into GiveDirectly's safeguarding and governance framework for future resilience.

References:

- GiveDirectly DRC Case Report (2023). <https://www.givedirectly.org/drc-case-2023/>
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Thank you,

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GiveDirectly