

## **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

---

### **A. 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.

### **B. 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.

### **C. 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/>
- Coombs, W. T. (2015). The value of communication during a crisis: Insights from strategic communication research. *Business Horizons*, 58(2), 141–148.
- Hale, J. E., Dulek, R. E., & Hale, D. P. (2005). Crisis response communication challenges: Building theory from qualitative data. *Journal of Business Communication*, 42(2), 112–134.
- David, M. D., & Carignan, M. (2017). Crisis communication adaptation strategies in the MM&A train explosion in Lac-Mégantic downtown. *Corporate Communications: An International Journal*, 22(3), 369–388.
- Greenberg, J., & Elliott, C. (2009). A cold cut crisis: Listeriosis, Maple Leaf Foods, and the politics of apology. *Canadian Journal of Communication*, 34, 189–204.

Thank you,

Dr. Sarah Kayongo  
VP of Programs  
GiveDirectly