

TERMS OF REFERENCE (ToR)

Safeguarding, Gender, and Data Protection Manager

EdTech Fellowship Program

1. Background

The ICT Chamber is implementing the EdTech Fellowship Program in Kigali, Rwanda. The Fellowship supports eight (8) Rwanda-based EdTech companies through a structured six-month acceleration program designed to strengthen product quality, educational effectiveness, scalability, and sustainability.

Because the participating companies design and deliver digital learning solutions that reach children, young people, and other potentially vulnerable users, safeguarding is a core participation requirement of the Fellowship rather than an optional add-on. Every fellow company is expected to develop, adopt, and operationalize a safeguarding policy and to build the internal capacity needed to keep learners and staff safe.

To lead this work, the ICT Chamber seeks to recruit a **Safeguarding, Gender, and Data Protection Manager** who will embed safeguarding and gender inclusion into the design of the Fellowship and provide hands-on technical support to the eight participating companies throughout the acceleration period.

2. Purpose of the Assignment

The purpose of this assignment is to:

- Integrate safeguarding and gender inclusion principles into the Fellowship design, milestones, and monitoring framework.
- Support each participating company to develop, adopt, and operationalize a practical safeguarding policy suited to its context.
- Build lasting safeguarding capacity within the companies, including trained focal persons, functional reporting channels, and proactive risk management practices.
- Ensure the protection of children, women, and girls, persons with disabilities, and other vulnerable groups reached by the fellows' products and activities.
- Set up a clear governance and policy framework, so that safeguarding, gender, and data protection are backed by written policies and clear lines of accountability.
- Protect the personal data of both the fellows and the beneficiaries they serve, in line with Rwanda's data protection law.
- Promote a culture in which safeguarding is treated as a shared responsibility and a collective mindset across the Fellowship, not a compliance checklist.

3. Scope of Work

The Manager will support the Fellowship across two main phases:

Phase 1: Program Design, Needs Assessment, and Milestone Setting

The Manager will:

- Develop the Fellowship Safeguarding and Gender Framework, aligned with the Mastercard Foundation safeguarding standards, Rwanda's child protection and labour laws, and Law No. 058/2021 on the protection of personal data and privacy.
- Design and administer a safeguarding self-audit for each of the eight companies. The self-audit serves as a needs assessment that identifies each company's specific gaps, for example whether a company needs foundational training or more advanced support.
- Use the audit results to set specific, measurable, achievable, relevant, and time-bound (SMART) safeguarding milestones for each company for the acceleration phase. These milestones are integrated into the Fellowship milestones tracker and into each company's performance and compliance reviews.
- Develop practical tools and templates for participating companies, including:
 - ◆ A safeguarding policy template adaptable to each company's context
 - ◆ An operational risk register template with mitigation planning guidance
 - ◆ Consent process templates, including media consent forms for data and content collection
 - ◆ A guide for setting up accessible reporting channels (dedicated email addresses, WhatsApp lines, digital platforms, and physical options such as branded speak-out boxes in schools for companies working directly with children)
- Design a safeguarding training curriculum covering foundational training for all fellows, refresher training for new joiners, and specialized sessions where needed. Training should be deliverable in a consistent, repeatable way (for example through a Learning Management System) so that standards do not depend on who is in the room.
- Integrate safeguarding orientation into the Fellowship onboarding process and advise companies on integrating it into their own staff onboarding and background check processes for new hires.

- Ensure all frameworks and tools reflect gender inclusion considerations and the needs of persons with disabilities, and remain practical for early-stage companies with limited resources.

Governance and Policy Framework

The Manager will help the Fellowship and the participating companies put in place a full set of policies, so that safeguarding does not stand on its own. This includes supporting the development, adoption, and review of:

- A safeguarding policy
- A prevention of abuse and harassment policy, including protection from sexual exploitation, abuse, and harassment (PSEAH)
- A diversity and inclusion policy for employees
- A data protection and privacy policy
- A disciplinary policy that sets out clearly how breaches and misconduct are handled

The Manager will also make sure each company has clear accountability for these policies, with a named person responsible and a plan to review and revise the policies on a regular basis (for example every one to two years).

Data Protection and the DPO Function

Data protection sits at the heart of safeguarding, because the fellows collect and hold sensitive data about their staff and their beneficiaries, many of whom are children. The Manager will:

- Help each company understand whether it acts as a data controller, a data processor, or both under Rwanda's Law No. 058/2021, and what that means in practice.
- Explain the Data Protection Officer (DPO) function and support each company to get the DPO certificates, assign responsibility for data protection, whether through a dedicated DPO or a designated staff member, depending on the company's size.
- Guide companies on registering with the National Cyber Security Authority (NCSA) as required, and on the practical steps to protect the data of both fellows and beneficiaries.
- Advise on lawful and ethical data collection, storage, sharing, and consent, with special care for data belonging to minors.

The Manager guides companies on good data protection practice. The companies themselves remain responsible for obtaining their own legal certifications and registrations.

Phase 2: Technical Advisory and Milestone Support During Acceleration

During the six-month acceleration period, the Manager will:

- Deliver the foundational safeguarding training to all eight companies and refresher sessions as team compositions change.
- Support each company to designate a safeguarding focal person and a backup. Coach these focal persons so they understand their project context, attend the required training, and disseminate knowledge within their organizations.
- Provide tailored advisory sessions (individual and group-based) to help companies develop and operationalize their safeguarding policies, formalize background checks, and embed safeguarding into everyday operations.
- Support companies to build and maintain operational risk registers, identifying risks and mitigation strategies before incidents occur. Where incidents do occur, guide companies to treat them as learning opportunities and update their policies and procedures accordingly.
- Support companies to establish functional reporting channels that allow both anonymous and identified reporting, and verify that these channels actually work in practice.
- Advise companies on the ethical and lawful handling of learner data, particularly data belonging to minors, and on formal consent processes. The Manager guides companies on safeguarding-related data practices; the companies themselves remain responsible for obtaining their own legal certifications, such as data controller or processor registration.
- Identify the specific needs of vulnerable groups, including persons with disabilities, during the assessment phase and support companies to design appropriate, targeted interventions.
- Verify capacity building through evidence such as training records, attendance notes, recordings, and internal dissemination materials.
- Track each company's progress against its safeguarding milestones, follow up on delays, and provide written progress summaries for each company to the Program Manager.
- Mobilize external experts for specialized topics (for example intellectual property or specific data protection questions) when needs go beyond internal capacity.
- Represent the Fellowship in the safeguarding community of practice and peer exchanges with other hubs supported by the Mastercard Foundation, and bring learnings back into the program

Agreed Safeguarding Milestones for the Companies

Each company's safeguarding milestones are drawn from the results of its needs assessment (self-audit) and are tied to its performance and funding disbursements.

Beyond attending seminars and webinars, these milestones include concrete activities such as:

- Carrying out a safeguarding needs assessment and feeding the results directly into the company's milestones.
- Developing (or revising) a safeguarding policy, and setting a date to review it again (for example every one to two years).
- Planning and training their fellows on the safeguarding policy, so that everyone understands it.
- Planning and training their staff to socialise and live by the safeguarding policy in daily work.
- Putting consent forms in place, and using them every time they engage beneficiaries.
- Designating a safeguarding focal person and a backup.
- Setting up working reporting channels, including anonymous options.
- Formalizing background checks for new hires and building an operational risk register.

4. Deliverables

The Manager shall deliver:

- Fellowship Safeguarding and Gender Framework (co-developed document)
- Safeguarding self-audit tool and a baseline audit report for each of the eight companies
- SMART safeguarding milestone plans for each company, integrated into the Fellowship milestones tracker
- Safeguarding training curriculum, materials, and delivery reports (foundational and refresher)
- Practical tools and templates (policy template, risk register, consent forms, reporting channel guide)
- Support to develop the full policy suite for the companies: safeguarding, prevention of abuse and harassment, diversity and inclusion, data protection and privacy, and disciplinary policies
- Data protection guidance note covering the DPO function and data controller and processor roles under Law No. 058/2021
- Advisory session summaries and monthly milestone progress updates for each company
- Mid-term progress brief
- Final technical report, including an end-line safeguarding audit for each company showing how much its safeguarding capacity improved against the baseline, and recommendations for future cohorts

5. Duration of Assignment

- Total engagement: 12 Months (Full-Time)

6. Reporting and Coordination

The Manager will report to the EdTech Fellowship Program Manager and work closely with the program implementation team, including the MEL Manager, Finance Manager, Communication Manager, and Science of Learning Manager. The Manager will also liaise with the Mastercard Foundation safeguarding leads and partner hubs as part of the wider safeguarding community of practice.

7. Required Qualifications and Experience

Academic Background

- Degree in Social Work, Child Protection, Gender Studies, Law, Development Studies, Psychology, or a related field. An advanced degree is an asset.

Professional Experience

- Minimum of 4 to 6 years of professional experience in:
 - ◆ Safeguarding, child protection, or protection from sexual exploitation, abuse, and harassment (PSEAH)
 - ◆ Gender inclusion and support to vulnerable groups, including persons with disabilities
 - ◆ Developing and operationalizing safeguarding policies, risk registers, and reporting mechanisms
- Demonstrated experience designing and delivering safeguarding training for adult learners.
- Working knowledge of Rwanda's legal framework on child protection and personal data protection.
- Experience working with startups, innovation hubs, or EdTech companies is a strong asset.

Core Competencies

- Strong advisory, coaching, and facilitation skills
- Ability to translate safeguarding standards into practical steps for small, resource-constrained companies

- High level of integrity, discretion, and sensitivity in handling confidential and safeguarding-related information
- Strong written communication and reporting capacity
- Fluency in English; proficiency in Kinyarwanda is a strong asset

8. Application Requirements

Interested candidates should submit:

- Updated CV highlighting relevant experience
- Cover letter
- Samples of relevant previous work (if available)

9. Application process and deadline

The Rwanda ICT Chamber is committed to promoting diversity, equity, and inclusion in the workplace. Qualified candidates from all backgrounds are encouraged to apply.

Women are strongly encouraged to apply.

All interested candidates must submit their applications to employment@ictchamber.rw by August 09, 2026. Late applications will not be considered.