



MINISTRY OF LOCAL GOVERNMENT, DECENTRALISATION AND RURAL
DEVELOPMENT

GULF OF GUINEA NORTHERN REGIONS SOCIAL COHESION (SOCO)
PROJECT

GENDER BASED VIOLENCE, SEXUAL
EXPLOITATION AND ABUSE, AND SEXUAL
HARASSMENT (GBV, SEA and SH)

ACTION PLAN

JANUARY 2023

GULF OF GUINEA NORTHERN REGIONS SOCIAL COHESION (SOCO) PROJECT
GENDER BASED VIOLENCE SEXUAL EXPLOITATION AND ABUSE AND
SEXUAL HARASSMENT ACTION PLAN

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LIST OF ABBREVIATIONS

FMC	Facility Management Committee
CIGS	Complementary Income Generation Scheme
DSWCD	Department of Social Welfare and Community Development
DOVVSU	Domestic Violence and Victims Support Unit
ESS	Environmental and Social Standards
GoG	Government of Ghana
GHANAP	Ghana National Action Plan for the Implementation of the United Nations Security Council Resolution
GBV	Gender Based Violence
GNHR	Ghana National Household Registry
GPN	Good Practice Note
GMM	Grievance Mechanism
GLSS	Ghana Living Standards Survey
IPF	Investment Project Financing
MMDAs	Metropolitan/Municipal/District Assemblies
MoGCSP	Ministry of Gender, Children and Social Protection
MLGDRD	Ministry of Local Government, Decentralization and Rural Development
M&E	Monitoring and Evaluation
NAP	Nation Action Plan
RSWO	Regional Social Welfare Officer
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SWCES	Single Window Citizens Engagement Service
SP	Social Protection
UNSCR	United Nations Security Council Resolution
UCMS	Unified Case management System
WHO	World Health Organization
ZCOs	Zonal Coordinating Offices
ESSO	Environmental and Social Safeguard Officers

1. INTRODUCTION

For a decade, the conditions of the over sixteen (16) million people living in northern Benin, Côte d'Ivoire, Ghana, and Togo have been threatened by the spread of conflict from the Sahel, a situation aggravated by increased exposure and vulnerability in the face of climate change. These external pressures of conflict, climate change, as well as the recent outbreak of the COVID-19 pandemic have compounded enduring challenges of poverty, exclusion, and weak governance.

Endemic poverty, inadequate opportunities for youth, inter-community tensions and structural fragilities in these northern regions pose an increasing security challenge for sub-regional countries. This situation can potentially create a vicious cycle that threatens to catalyze the southward spread of the escalating Sahel conflict. Together, the northern belt of the Gulf of Guinea has become a unique converging point for multiple crises. In response, individual Government agencies and development partners have focused on addressing insecurity and extremism in the Sahel without targeting the threat of further spill overs. In addition, efforts to improve socio-economic conditions in these northern regions have lacked coordination resulting in sporadic outcomes across the region.

It is in recognition of this, that the Government of Ghana with support from the world bank is implementing the Gulf of Guinea Northern Regions Social Cohesion (SOCO) Project. The project seeks to contribute to the prevention of the spread of conflict from the Sahel region, reduce vulnerability to climate change, strengthen local institutions, improve economic opportunities, build public trust. and strengthen regional dialogue across the Gulf of Guinea countries (Benin, Côte d'Ivoire, Ghana, and Togo).

The design of the SOCO Project includes the construction and rehabilitation several number of infrastructural projects through a community driven development approach. The SOCO Project is also expected to deliver various capacity building programmes at various levels of government which will also train, common interest groups, project staff and Metropolitan, Municipal and District Assembly (MMDA) staff delivering diverse services to the target communities. It is therefore essential for the project to take into consideration the high labor influx (both skilled and unskilled), the high levels of poverty, polygamy, harmful cultural practices and norms, violence against women and girls in the context of migrant hosting districts interacting with communities to exacerbate the risk of Gender Based Violence and Sexual Exploitation and Abuse (GBV/SEA). These identified risks if not managed, can lead to further marginalization and abuse of women, girls and children who are already vulnerable.

Additionally, the SOCO beneficiary regions are androcentric in nature there by exposing community members further to the risk factor of GBV. Communities within these regions are mostly characterized by:

- a. Forced and early marriage of girls is a common cultural practice, and that women and girls do not freely participate in public consultations.
- b. School enrolment and retention rates among girls in target communities are still low due to domestic responsibilities, child marriage, teenage pregnancy, lack of money for

school fees, long distances to schools, and lack of sanitation facilities and supplies among other factors.

To facilitate discussion, and ensure the involvement of women and girls, focus group discussions during the project social assessment to gain the confidence of women and girls to share their experiences and contribute to critical discussions. .

The SOCO Project is bonded by a legal covenant to prepare a Gender-Based Violence (GBV), Sexual Harassment (SH), Sexual Exploitation and Abuse (SEA) (GBV/SEA/SH) Action Plan which provides guidelines and mechanisms to prevent Gender-Based Violence, Sexual Harassment, Sexual Exploitation and Abuse, in a complementary and comprehensive manner through multi-sectoral, and multi-dimensional approach to provide appropriate care and services to survivors. It adopts an approach that considers the climate around Gender Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) in the workplace and beneficiary communities and aims to include appropriate policies and codes of conduct that must be implemented together with training and awareness programs to address and prevent the occurrence of these issues. .

The document also outlines outputs and indicators as to how the activities will be measured within the timelines as presented in the action plan. The annexes include Gender Based Violence Code of Conduct (Annex) which will be signed by all Project Actors and Monitoring Checklists (Annex XX) to monitor gender related issues under the SOCO project.

1.1 Definition of Concepts

Gender-Based Violence (GBV), Sexual Harassment (SH), Sexual Exploitation and Abuse (SEA), are the key concepts mentioned in this document and explained below:

1.1.1 Gender Based Violence (GBV)

The Inter-Agency Standing Committee (IASC)¹ defines gender-based violence as “an umbrella term for any harmful act that is perpetrated against a person’s will, and that is based on socially ascribed (gender) differences between males and females. GBV broadly encompasses physical, sexual, economic, psychological/emotional abuse/violence including threats of such acts, coercion, and other deprivations of liberty. Globally, women, and girls are disproportionately exposed and affected by GBV. This also includes harmful practices occurring between individuals, within families and within the community. These include sexual violence, domestic or intimate partner violence, human trafficking, forced and/or early marriage, and other cultural practices that cause harm.

1.1.2 Sexual Exploitation and Abuse (SEA)

Any attempted or actual abuse 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. Sexual abuse is further defined as “the actual or threatened physical

¹ Inter-Agency Standing Committee- the primary mechanism for inter-agency coordination of humanitarian assistance among UN and non-UN humanitarian partners.

Secretary-General’s Bulletin on “Special Measures for Protection from Sexual Exploitation and Sexual Abuse” (ST/SGC/2003/13)

intrusion of a sexual nature, whether by force or under unequal or coercive conditions.” SEA is therefore a form of gender-based violence and refers to acts perpetrated against beneficiaries by a project staff, contractors, consultants, workers and Partners. Women, girls, boys and men can experience SEA. In the context of World Bank supported projects, beneficiaries or members of project-affected communities may experience SEA.

1.1.3 Sexual harassment (SH)

Sexual Harassment (SH) refers to unwelcome sexual advances, requests for sexual favours, and other unwanted verbal or physical conduct of a sexual nature. SH differs from SEA in that it occurs between personnel/staff working on the project, and not between staff and project beneficiaries or communities. The distinction between SEA and SH is important so that institution’s policies and staff training can include specific provisions on the procedures to report SEA and SH. SH can be experienced by both women and men .

There are different forms of gender-based violence can occur at a workplace which have to be made known to every worker as part of their induction course into the project. These include but not limited to:

- Bullying, physical and verbal abuse from work colleagues, supervisors or managers.
- Sexual harassment and unwanted sexual advances.
- Sexual abuse and violence, including ‘coercive’ or transactional sex, rape and sexual assault.
- Abuse and harassment around pregnancy.
- Psychological abuse and intimidation.
- Threats and acts of physical and sexual violence.
- Abusive working conditions such as poor health and safety (including building and equipment safety).
- Inadequate or inappropriate sanitary facilities and rules about their use.
- "Involuntary excessive long working hours and unpredictable or late demands to work overtime." (“3. Gender-based violence in the world of work - GBV”)

1.2 Legal and Policy Framework

2. This Gender-Based Violence, Sexual Harassment, Sexual Exploitation and Abuse Action Plan is prepared in line with laws in Ghana and the World Bank Environmental and Social Standards (ESSs), specifically ESS1, EESS2, ESS4 and ESS10. It is aligned with the recommendations in the World Bank Good Practice Note: Addressing Gender-Based Violence, Sexual Harassment, Sexual Exploitation and Abuse (SEA/SH) in Investment Project Financing involving Major Civil Works², adapted to the Gulf of Guinea Northern Regions Social Cohesion Project.

Other supporting conventions and country-specific policies that support the Gender-Based Violence, Sexual Harassment, Sexual Exploitation and Abuse Action Plan include the ILO Convention 190 (Sexual harassment at work places), National Policy on the Advancement of Women, Ghana GVB Action Plan, National Social Protection Policy, National Workplace, Criminal Code Amendment Act, 1992 Constitution of the Republic of Ghana, Children’s Act, 1998

² [Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works \(worldbank.org\)](https://www.worldbank.org/)

(560); Persons with Disability Act, 2006 (Act 715); National Gender Policy (2015; National Population Policy (1969, revised 1994) and National Social Protection Policy (2015).

1.2.1 Relevant World Bank Environmental and Social Standards (ESS)

The ESS contains environmental and social standards that borrowers must apply to all projects for the projects to be sustainable, non-discriminatory, transparent, participatory, environmentally and socially accountable as well as conform to good international practices. The relevant World Bank Environmental and Social Standards for the Gender-Based Violence, Sexual Exploitation and Abuse and Sexual Harassment Action Plan for the SOCO Project include:

ESS1: Assessment and Management of Environmental and Social Risks and Impacts. These standards place the responsibility of ameliorating the environmental and social impacts of a Bank-financed project on the borrower. Specifically, the objectives are to:

- i. identify, evaluate, and manage the environment and social risks and impacts ,
- ii. anticipate and avoid risks and impacts,
- iii. minimize or reduce risks and impacts to acceptable levels where avoidance is not possible,
- iv. mitigate, compensate or offset where significant residual impacts remain,
- v. adopt differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable, and they are not disadvantaged in sharing development benefits and opportunities resulting from the project.

It encourages utilization of institutions, systems, laws, regulations and procedures in the assessment, development, and implementation of projects, whenever appropriate.

ESS 2: Labor and Working Relations. ESS2 recognizes the importance of these in the pursuit of poverty reduction and economic growth. It requires management to:

- i. treat workers fairly and provide them with safe and healthy working conditions to enhance the development benefits of projects,
- ii. to protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate and
- iii. to provides project workers with accessible means to raise workplace concerns specific to objectives of ESS 2.

ESS 4: Community Health and Safety. ESS4 addresses the potential health, safety, and security risks and impacts of projects (resulting from project activities, equipment, and infrastructure) on project-affected communities. It places a responsibility on the Borrower to:

- i. avoid or minimize such risks and impacts, with particular attention to people who, because of their circumstances, may be vulnerable,
- ii. anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life cycle from both routine and non-routine circumstances,
- iii. promote quality and safety, and considerations relating to climate change, in the design and construction of ... to ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities.

ESS 10: Stakeholder Engagement and Information Disclosure. This ESS places premium on open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Its specific objectives are:

- i. to establish a systematic approach to stakeholder engagement that will help identify stakeholders and build and maintain project affected parties;
- ii. to assess the level of stakeholder interest and support for the project and to enable stakeholders ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format; ,
- iii. to provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow Borrowers to respond to and manage such grievances.

1.2.2 Technical Guidance Document

The under-listed documents have guided the preparation of the Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) Action Plan:

World Bank Good Practice Note: Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works. This Good Practice Note (GPN) serves as a tool/guide for Borrowers to identify GBV, Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) related risks that can emerge in Bank Investment Project Financing (IPF) with major civil works contracts and develop best practices to prevent, minimise and/or mitigate such risks. The GPN is developed based on World Bank experience and good international industry practices, including those of other development partners. The focus is on Sexual Exploitation and Abuse (SEA)-exploitation of a vulnerable position, differential power or trust for sexual favours and actual or threatened sexual intrusion. Workplace Sexual Harassment (SH) in the form of unwelcome sexual advances, request for sexual favours and sexual physical contact, which are the forms of GBV most likely to occur or be aggravated by IPF. The document proposes feasible evidence-based approaches that emphasize prevention, risk minimization and management, especially risks that harm girls, women and Persons with Disabilities. It also prioritises the importance of building on national, district and community levels' knowledge through stakeholder engagement and continuous monitoring and learning. This document is included in the references.

World Health Organization (WHO) Code of Ethics and Professional Conduct. The Code of Ethics and Professional Conduct outlines measures to ensure effectiveness, efficiency, transparency, and accountability by promoting and upholding the highest organizational standards, ethical principles and conduct for staff. The Code of Ethics and Professional Conduct covers fair and respective workplace, prevention of sexual exploitation, personal conduct, relations with government and political activity and reporting wrongdoing as well as protection for whistle-blowers. Ghana's Codes of Ethics for workers conforms to the WHO Ethics and Professional Conduct.

ILO Convection on Harassment (ILO C190). This aims to eliminate workplace violence and harassment and redefines a future of conducive work environment based on dignity, respect, devoid of violence and harassment. It recognizes that violence and harassment in the work environment can constitute a human rights violation or abuse, is a threat to equal opportunities and is unacceptable and incompatible with decent work.

1.2.3 Relevant In-Country Laws

The relevant constitutional, legislative and key national gender equality and women empowerment frameworks or laws guiding the development of this Action Plan include:

- *The 1992 Constitution of Ghana (Article 17)*. prohibits discrimination of persons on the basis of gender.
- *The 1992 Constitution of Ghana (Articles 12-33)* This has entrenched provisions on fundamental Human Rights. It says "every person has the right to be treated with dignity and respect under all conditions. No one shall be held in slavery or illegally work against his will. Customary practices which dehumanize or are injurious are prohibited". All the rights mentioned in the Ghanaian Constitution prohibit domestic violence.
- *Criminal Code Amendment Act, 1998 (Act 554)* prohibits female circumcision and further makes enforcement more effective.
- *The Domestic Violence Act, 2007 (Act 732)* criminalises all forms of violence and further establishes the Domestic Violence and Victims Support Unit (DOVVSU) to speedily respond to situations of violence against women. The Domestic Violence Act provides legal environment to empower various Actors and Professionals to deal more effectively with the problem of domestic violence.
- Repeal of *Section 42(g) of the Criminal Offenses Act, 1960 (Act 29)* which previously permitted non-consensual sex within marriage.
- *Human Trafficking Act, 2006 (Act 694)* addresses trafficking of persons. The Act also sets up the Human Trafficking Management Board (HTMB) which provides technical advice to the Ministry to effectively respond to trafficking cases.
- The *National Population Policy*³s provisions, especially on reproductive health also recognizes protection for the welfare of women and children, the National Reproductive Health Policy of the Ministry of Health similarly provides basis to combating domestic violence.
- *The National Gender Policy*⁴ seeks to promote the survival, development and protection of women and children in order to achieve equal status for them in society.

1.2.4 Codes Of Professional Ethics

[Code of conduct for the Ghana Civil Service](#). This Code of Conduct prescribes appropriate norms and standards of behavior and attitudes for employees of the Ghana Civil Service. The code provides specific rules and requirements for the Civil Servant which are based on the guiding principles of selflessness, integrity, justice and fairness, accountability, transparency, and leadership. The objectives of the Code of Conduct are to:

- set the tone and standards for the conduct of employees of the Service to provide an expansive and continuous ethical educational process.
- provide appropriate administrative sanctions to be applied where an employee's conduct is found to be inconsistent with the Code.

[Ghana National Action Plan for the Implementation of the United Nations Security Council Resolution 1325 On Women Peace and Security \(GHANAP 1325\), 2020](#). The overall goal of the

³ National Population Policy (Revised Edition, 1994)

⁴ National Gender Policy, 1995, 5

NAP 2020 is “to build inclusive, secure and safe societies for women and girls in Ghana anchored on the tenets of United Nations Security Council Resolution 1325 (UNSCR 1325) (p. 13). The NAP is structured with reference to the main pillars of UNSCR 1325: participation; protection; prevention; and recovery and rehabilitation that would enable the country to achieve these objectives:

- Protection and Promotion of the Human Rights of Women and Girls in Situations of Conflict and in Peace Support Operations
- Participation of Women in Conflict Prevention, Peace and Security Institutions and Processes
- Prevention of Violence against Women including Sexual, Gender-Based and Conflict related Violence

[National Child and Family Welfare Policy, 2015](#) Ghana's Child and Family Welfare Policy focusses on the prevention of violence, abuse and exploitation of children. It underpins a child protection system that will safeguard and respond to children and their families when needed and provide support to mitigate risks for vulnerable families. This Policy recognizes a child as a person below the age of eighteen. In line with the UN Convention on the Rights of the Child, the 1992 Fourth Republic Constitution of Ghana (article 28) and the Children’s Act 1998, (Act 560) (section 1). The policy describes childhood as a period when a person is under the authority, control and care of some persons considered as adults in society. The Policy defines welfare as guaranteeing the availability of the necessities of life as well as minimizing the levels of violence, exploitation, abuse and neglect.

2. PROJECT BACKGROUND AND GBV SEA SH RISKS

1.3 Project Components

The project has five (5) components, as shown in the diagram below:

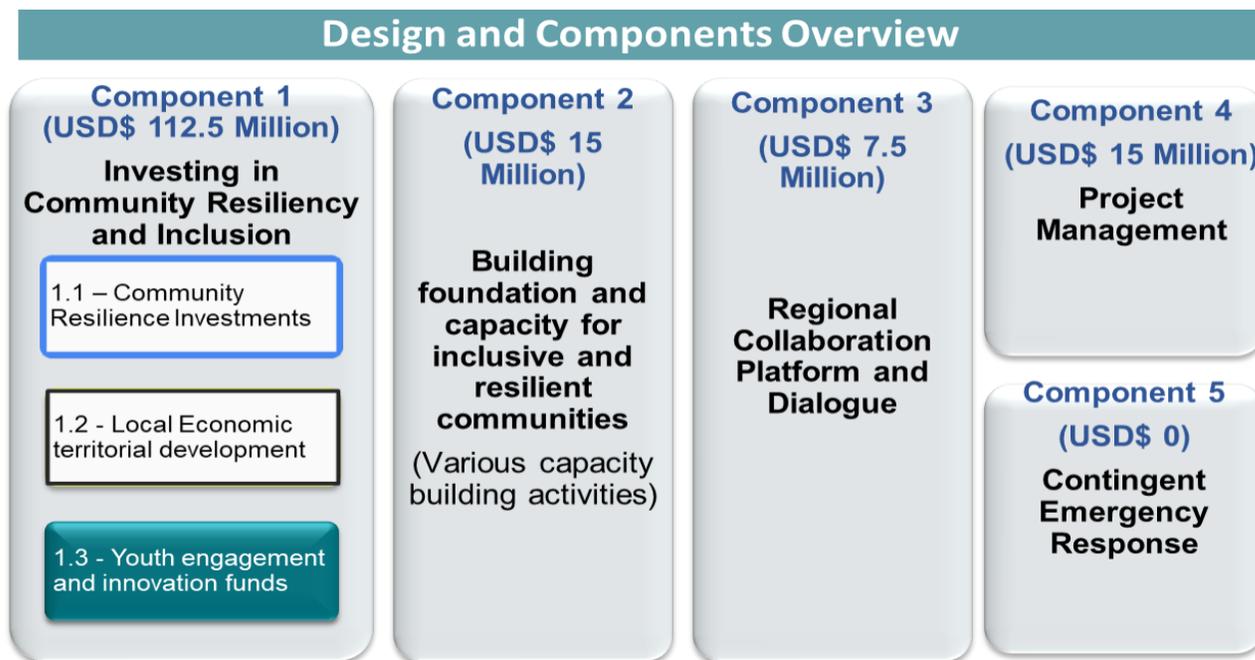


Figure 1: Project Components Under the Gulf of Guinea Northern Regions Social Cohesion Project

1. *Component 1: Investing in Community Resiliency and Inclusion* The component aims to support people in the target Metropolitan, Municipal, and District Assemblies (MMDAs), through the financing of local-level investments to promote inclusive and resilient communities with enhanced access to economic opportunities, especially in border areas. The Project will adopt a Community-Driven Development (CDD) approach to deliver community assets. This will entail community involvement in sub-project identification, planning and implementation.

Sub-component 1.1: Community investments for strengthening local resilience and inclusion. This sub-component will support increasing access to community-level, climate-resilient, socio-economic infrastructure by financing community investment for the construction, rehabilitation, upgrading and/or equipping of community infrastructure designed to enhance the inclusion of women, youth, displaced persons and people with disabilities and their equitable access to social services.

Sub-component 1.2: Strategic economic activity investments for local economic development. This sub-component aims to create both short and long-term benefits to existing economic sources of resilience by investing strategically in targeted local markets, including livestock markets. The sub-component will finance the rehabilitation of existing rural markets and the development of economic activities (services, development of value

chains, quality enhancement, aggregation, etc.) linked to the rehabilitation of these markets to generate local employment and income.

Sub-component 1.3: Youth engagement and social cohesion activities. The sub-component will finance (a) social cohesion activities and events; and/or (b) rehabilitate, upgrade and/or equip cluster-level community infrastructure— that is identified and prioritized by the youth.

Component 2: Building Foundation and Capacity for Inclusive and Resilient Communities. This component will support training and capacity-building activities aimed at strengthening the capacity of stakeholders at various levels, including individual beneficiaries, DAs, Community Facilitators (CFs), CPICs, Facility Management Committees (FMCs), youth groups, women groups and other local-level actors, as well as national level stakeholders.

Component 3: Regional Coordination Platform and Dialogue. This component aims to improve regional coordination among the four target countries and promote a coordinated response to Fragility, Conflict and Violence (FCV) and climate-related challenges. Specifically, it will fund the project's Regional Coordination Platform (RCP), which will focus on three pillars, i.e., data collection and analysis, knowledge generation, and dialogue. This component will establish and operationalize the Committee for Regional Coordination (CRC) to improve national capacity to engage and co-lead regional dialogues

Component 4: Project Management. This Component will support project management and coordination at the regional, national, and subnational levels to ensure the effective implementation of project activities, management and monitoring of social and environmental safeguards, financial management and procurement, preparation of work plans, budgets, and progress reports, communication and publicity campaigns, Management Information System (MIS), setting up and managing a project beneficiary feedback mechanism, as well as steps to improve openness and accountability, including the use of ICT platforms.

1.4 Anticipated (GBV) SEA-SH Risks

Community members especially women and children within beneficial communities are highly at risk of (GBV) SEA-SH including rape, assault and defilement which could be committed by Project Staff, Regional and District Assembly Focal Persons and other Staff, Contractors, Contractor Supervisors, Contractor's Suppliers, Community Facilitators, Timekeepers, Service Providers, Community Project Implementation Committee (CPIC) members, Volunteers and Suppliers. The following are some anticipated (GBV) SEA-SH risks associated with implementation of the interventions.

Community members especially women and children within beneficial communities are highly at risk of (GBV) SEA-SH including rape, assault and defilement from Project Staff, Regional and District Assembly Focal Persons and other Staff, Contractors, Contractor Supervisors, Contractor's Suppliers, Community Facilitators, Timekeepers, Service Providers, Community Project Implementation Committee (CPIC) members, Volunteers and Suppliers. The following are some anticipated (GBV) SEA-SH risks associated with implementation of the interventions.

- i. Project Staff/ MMDA Staff involved in selecting vulnerable beneficiaries may demand sexual favours in return for selection as beneficiaries of the project.
- ii. Project Beneficiaries (especially women and girls) in the beneficial communities can be victims of rape, sexual assaults, defilement and gender-based violence caused by Project Staff, Staff of the beneficiary Metropolitan, Municipal and District Assemblies, Project Contractors, Client Supervisors, Contractor Supervisors, Community Facilitators, Members of the CPIC, Time Keepers, Service Providers/ Mentors/Coaches,Volunteers and Suppliers during project implementation activities.
- iii. Community members and (particularly women and girls) within the beneficial communities, can become victims of (GBV) SEA-SH such as rape, defilement and assault, which could be committed by Project Actors including Project Staff, Staff of the beneficiary Metropolitan, Municipal and District Assemblies, Project Contractors, Client Supervisors, Contractor Supervisors, Community Facilitators, Members of the CPIC, Time Keepers, Service Providers/ Mentors/Coaches, Volunteers and Suppliers, Community Focal Persons, Trainers, Facility Management Committee, Volunteers and Suppliers during project implementation.
- iv. Vulnerable persons including persons with disabilities, marginalized individuals and women can be targets of sexual exploitation or abuse in the process of accessing benefits (targeting or recruitment) under the project.
- v. Project Staffs, District Assembly Staffs, Contractors, Clients Supervisors, Contractor Supervisors, Community Facilitators, Time Keepers, Service Providers/ Mentors/Coaches,Volunteers and Suppliers, trainers may discriminate against women and persons with disabilities in the selection, targeting or project implementation processes e.g., assigning task/training access to opportunities under LED.
- vi. Project Staff and other Actors at all levels may abuse other staff or members of project beneficiary communities physically and/or verbally. They may also be victims of abuse and other forms of (GBV) SEA-SH themselves.
- vii. Project Staff, Staff of the beneficiary Metropolitan, Municipal and District Assemblies, Project Contractors, Client Supervisors, Contractor Supervisors, Community Facilitators, Members of the CPIC, Timekeepers, Service Providers/ Mentors/Coaches, Volunteers and Suppliers may discriminate amongst each other based on the level of authority or may be victims of SEA-SH and physical or verbal abuse from other project staff.

Under the SOCO project, anticipated sources of GBV, SEA/ SH risks resulting from the implementation of the components may specifically include the following:

Table 1: Project component and Sources of GBV (SEA-SH) related risks

Project Component	Anticipated Sources of Risk
Component 1.1: <i>Community investments for strengthening local resilience and inclusion.</i>	Sudden influx of transient male workers into small and often rural host communities with low capacity to absorb the sudden increase of workers
	Selection, targeting and enrolment activities of unskilled Labour beneficiaries
	Recruitment of CFs
	Poorly designed or maintained physical spaces on project sites and in worker accommodation. (e.g., poor lightening in and around construction sites and access routes.)
	Considerations will also be made for sex disaggregation of the responsibilities to be assigned each worker at the project site.
	Recruitment of underaged workers
	Gender discrimination to construction roles
	Discrimination in assigned starting and closing timelines
	Discrimination in rates and payment of wages for work done
Protective clothing and accessories for health and safety	
Component 1.2: <i>Strategic economic activity investments for local economic development.</i>	Selection of beneficiaries for LED Programmes
	Gender Discrimination to access to economic facilities
	Classification of skills training based on gender
Component 1.3: <i>Youth engagement and social cohesion activities</i>	Influx of young male from adjoining communities in the district for social cohesion events
	Design and inclusion of young women and girls in the social cohesion events/ activities
	Discrimination in assigning roles
	Sexual exploitation of women and girls who participate in youth engagements and trainings
Component 2: <i>Building Foundation and Capacity for Inclusive and Resilient Communities</i>	Discrimination of women, minority groups and persons with disability in training and capacity building activities.
	sexual exploitation of women and vulnerable persons in the process of accessing training under the project
	Categorization of skills development or capacity building programmes based on gender
Component 3: <i>Data Collection from communities by Digital Data Fellows</i>	Sexual exploitation in the selection/ recruitment of Fellows
	Enrolment and training of enumerators
	Inadequate provision of logistics for safe data collection
Component 4: <i>Reporting GBV/SEA/ SH cases</i>	Unavailability of various confidential channels of reporting
	Remote locations where people have limited access to resources to report GBV/ SEA/SH as well as receive support
	Social Stigma of reporting GBV/ SEA/SH cases

Project Component	Anticipated Sources of Risk
	Inadequate training of SOCO staff on handling GBV/ SEA/ SH Cases through the SOCO GM
	Effective handling of GBV/ SEA/SH cases
	Generate gender disaggregated data on grievance redress to inform policy and programming
<i>Procurement</i>	Project actors soliciting sexual favors from bidders
	Gender-biased procurement processes

3. THE (GBV) SEA-SH FRAMEWORK FOR PREVENTION AND RESPONSE

The SOCO Project's (GBV) SEA-SH Prevention and Response Framework outlines principles and best practices in addressing (GBV) SEA-SH and describes roles and responsibilities of personnel assigned by the SOCO Project to address (GBV) SEA-SH, such as the Social Safeguards Specialist (SSS), Zonal Coordinating and Satellite offices (E&S Officers), MMDAs (GBV Focal Persons) and Community Facilitators. It also explains the operation of the Grievance Mechanism of the Project and how it responds to (GBV) SEA-SH cases in making referrals to Project Actors (Implementing Agency, Contractors, Consultants hired for the Project) for internal handling of cases; or referrals to GBV Service Providers (SPs) or both, for resolution of these cases.

The Framework further outlines accountability standards of who, what, when where and how to handle allegation by Project Actors through the application of their Codes of Conduct (CoCs) and policies in investigation and sanctioning for violations. In addition, this Prevention and Response Framework addresses issues on consent, mandatory reporting requirements, confidentiality and confidential data and information storage and handling, documentation, training and updating. The Prevention and Response framework is intended to guide the Project in ensuring that it implements the requirement to effectively address (GBV) SEA-SH risks to the Project.

1.5 Guiding Principles

The SOCO Project recognizes and applies the following principles, that:

1. All persons contracted to work under the SOCO Project will be treated with respect regardless of their race, colour, ethnicity, religion, political affiliation, disability, birth or another status.
2. Gender-based violence, including sexual exploitation and abuse and sexual harassment (GBV) SEA-SH undermine the mental and physical well-being of persons. Everyone, including children, have the right to live free from (GBV) SEA-SH.
3. All forms of (GBV) SEA-SH are unacceptable whether it occurs at the work/site, work/site surroundings, or at worker's camps.
4. The safety of survivors of (GBV) SEA-SH is of the utmost priority.
5. Perpetrators will be held accountable for their actions, as (GBV) SEA-SH constitute acts of serious misconduct and are therefore grounds for disciplinary measures, penalties and/or termination of employment.
6. Sexual activity with children under eighteen (18), including online harassment, is prohibited. Mistaken belief regarding the age of a child and consent from the child is not a defense.
7. Use of inappropriate language or behavior towards women, children and men that may be deemed harassing, abusive, sexually provocative, demeaning or culturally inappropriate is disallowed.
8. Exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behavior, is prohibited.

9. Sexual interactions between Project Contractors' employees or workers at any level and members of the communities surrounding the Project sites that are not agreed to with full consent⁵ by all parties involved in the sexual act are strongly discouraged. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex. Such sexual activity is considered "non-consensual" by the Project.

10. The Project will provide avenues and mechanisms for reporting allegations of (GBV) SEA-SH. There shall be no retribution, retaliation or victimization against persons who make reports against their employers or personnel of the Project.

11. All Management personnel of the Project have a responsibility to support and maintain an environment that is free of (GBV) SEA-SH.

1.6 The Prevention and Response Implementation Framework

The following Implementation Framework details personnel at different implementation levels to work on (GBV) SEA-SH mitigation, prevention, and response measures. In this framework, the project's Social Safeguards Specialist receives, designates and processes all cases assigned from the SWCES through the SOCO GM or received from other reporting channels, on GBV SEA/SH cases. Aside the SOCO SSS, the ESO at the ZCOs and SOs and GBV Focal Persons at the MMDAs are critical in follows and resolution of GBV cases. All the other personnel assigned GBV tasks are to undertake sensitization, community engagement and training activities.

All Designated members and all other Staff have a responsibility to bring cases to the notice of the GBV SEA SH system for appropriate action to be taken. These personnel do not have the mandate to process, investigate, settle or make decisions regarding cases that are reported to them.

All the outlined Project personnel will be trained on how to preserve the safety of survivors who approach them and the various channels for reporting. They may have to listen to the stories of the survivors before reporting to the GM for logging. They will be trained on confidential handling of information, ensuring safety and privacy for survivors when approached, and as far as guarantee that the information gathered will be kept confidential. The training will also include how to manage survivors who are minors.

⁵ Consent refers to when an adult makes an informed choice to agree freely and voluntarily to do something (GBV IMS classification tool). There is no consent when agreement is obtained through: i. the use of threats, force or other forms of coercion, abduction, fraud, manipulation, deception, or misrepresentation, ii. the use of a threat to withhold a benefit to which the person is already entitled, or iii. a promise made to the person to provide a benefit.

Table 2: The SOCO Framework for GBV / SEA/ SH Implementation

Structure	Designated Staff	Role
Project Implementation Unit	Social Safeguards Specialist	<ul style="list-style-type: none"> Oversee the overall implementation of preventive, mitigative and response measures to reduce GBV risks on the Project. Receive GBV complaints and forwards them to the necessary GBV service provider for redress. (Act as complaints administrator to only GBV cases) Liaise with Contractors/Employers and GBV service providers for the resolution of GBV cases on the Project. Oversee training of SOCO stakeholders and service providers on GBV
	Single Window Citizens Engagement System	<ul style="list-style-type: none"> Case Registration, Sorting, filtering and acknowledgement (provision of unique identification number) Classification, categorisation, and routing of the case to the SSS through the web-based Unified Case Management (UCMS) Log all complaints regarding the Project into the GM Along with the Social Safeguards Specialist, processes cases for referrals
Zonal Coordinating Offices (ZCOs) and Satellite Offices (SOs)	Social Development Specialist	<ul style="list-style-type: none"> Ensure the implementation of GBV mitigative measures on the Project
	Environmental and Social Safeguards Officers	<ul style="list-style-type: none"> Receive (GBV) SEA-SH cases and report such to the SSS for referrals and resolution. Facilitate training of SOCO service providers on GBV Follow up on GBV cases with service providers and at community level
MMDAs / RCCs	Gender Desk Officer, Social Welfare and Community Development Officer / GBV Focal Person	<ul style="list-style-type: none"> Ensure the implementation of GBV mitigative measures on the Project such as sensitization, stakeholder engagement, etc. Receive (GBV) SEA-SH cases and report such to the GM for referrals and resolution.
	Firm/ Contractor's staff responsible for GBV / SEA/SH	<ul style="list-style-type: none"> Facilitate training of SOCO service providers on GBV

Structure	Designated Staff	Role
Communities	Community Facilitators	<ul style="list-style-type: none"> • Ensure the implementation of GBV mitigative measures on the Project. • Receive (GBV) SEA-SH cases from the communities and report such to the designated entry points for GBV for resolution.
	Community Members / Beneficiaries	<ul style="list-style-type: none"> • Report Cases to the Various Channels for Solution

Source ⁶

1.7 Code of Conduct (CoC)

It is a policy that an organization develops to guide its employees and third parties on the organizations' principles, moral and ethical expectations and values. CoC refers to a guide to ethical conduct for all contractors, sub-contractors, consultants, employees, workers and anyone acting on behalf of the Gulf of Guinea Northern Regions Social Cohesion (SOCO) Project in implementing projects, activities and assigned tasks. Within the SOCO Project, three (3) CoCs will be put in place namely, **General CoC, Contractor CoC and Individual CoC**. The General CoC under the SOCO Project ensures compliance with national and international laws and every party working on this project has roles and responsibilities towards meeting all guidelines. It primarily focuses on the following:

- Awareness creation of (GBV) SEA-SH for all parties of the contractor
- Sexual Exploitation
- Sexual Abuse
- Sexual harassment
- Use of illegal substances
- Protection of children, to ensure workers do not engage with children under the age of eighteen on any form of abuse as well as online sexual harassment.
- Gifts and benefits
- Non-discrimination
- Stakeholders buy-in and participation.
- Sanitation requirements
- Penalties and violations
- Reporting system for (GBV) SEA-SH cases must be developed.
- Women, children (persons under the age of 18), and men must be treated with respect and dignity.
- Use of Inappropriate language or behavior which are unacceptable during the project.

⁶ MLGDRD, 2022, Project Implementation Manual, Gulf Of Guinea Northern Regions Social Cohesion (SOCO) Project,

It is mandatory for all contractors to ensure all workers sign a Code of Conduct (CoC) that specifies appropriate behavioral conduct, responsibility and penalties for non-compliance with SEA/SH, among other social misconducts. The SOCO PIU will support contractors to develop CoCs with clauses on SEA/SH compliance and ensures that they enforce the codes. The CoC will be translated into local languages and explained to workers in languages that they are familiar with before signing. Communities will also be informed of the CoC provisions during sensitizations.

All SOCO staff will be required to attend the induction training sessions and sign the individual CoC prior to commencement of work. The CoC will mandate them to report any suspected or actual (GBV) SEA-SH by a fellow worker or any breaches of the code of conduct. See annex 4 for CoC samples.

1.7.1 Sanctions

Sanctions shall be set up to deal with employees who are identified in perpetrating in GBV acts as specified by the framework. The nature of sanctions will be dependent on the severity of the employee’s act. The sanction shall include but not limited to formal warning, additional training, loss of up to one month’s salary, suspension of employment (without pay), termination of employment and referral to the police or other authorities as warranted.

SANCTION	
SEVERITY	<ul style="list-style-type: none"> • Additional training
	<ul style="list-style-type: none"> • Informal warning
	<ul style="list-style-type: none"> • Formal warning
	<ul style="list-style-type: none"> • Suspension
	<ul style="list-style-type: none"> • Loss of part or full salary for a period
	<ul style="list-style-type: none"> • Termination
	<ul style="list-style-type: none"> • Report to the police or other legal authorities with the consent of the survivor
	<ul style="list-style-type: none"> • Report to the police or legal authorities if the survivor is a minor

Figure 2: Code of Conduct Sactions according to severity

1.8 Grievance Mechanism (GM)

The SOCO Project has in place GM that manages complaints and feedback from all stakeholders involved in the project. The GM aims at strengthening accountability to communities, and allows local communities, employees, and other impacted stakeholders to file grievances with the project’s implementer and seek redress when they see a negative impact, due to the project’s operations, which includes the (GBV) SEA-SH cases and its effects on Project Affected Persons and other actors on the project. The GM will be a critical component of mitigating, managing, and resolving potential or actual negative consequences and contributing to constructive relationships with the greater stakeholder community, particularly local communities. The GM will leverage on the Single Window Citizens Engagements Service (SWCES) of the Unified Case Management System hosted by the Ministry of Gender, Children and Social Protection, which receives and assigns cases to the respective projects hosted on the system.

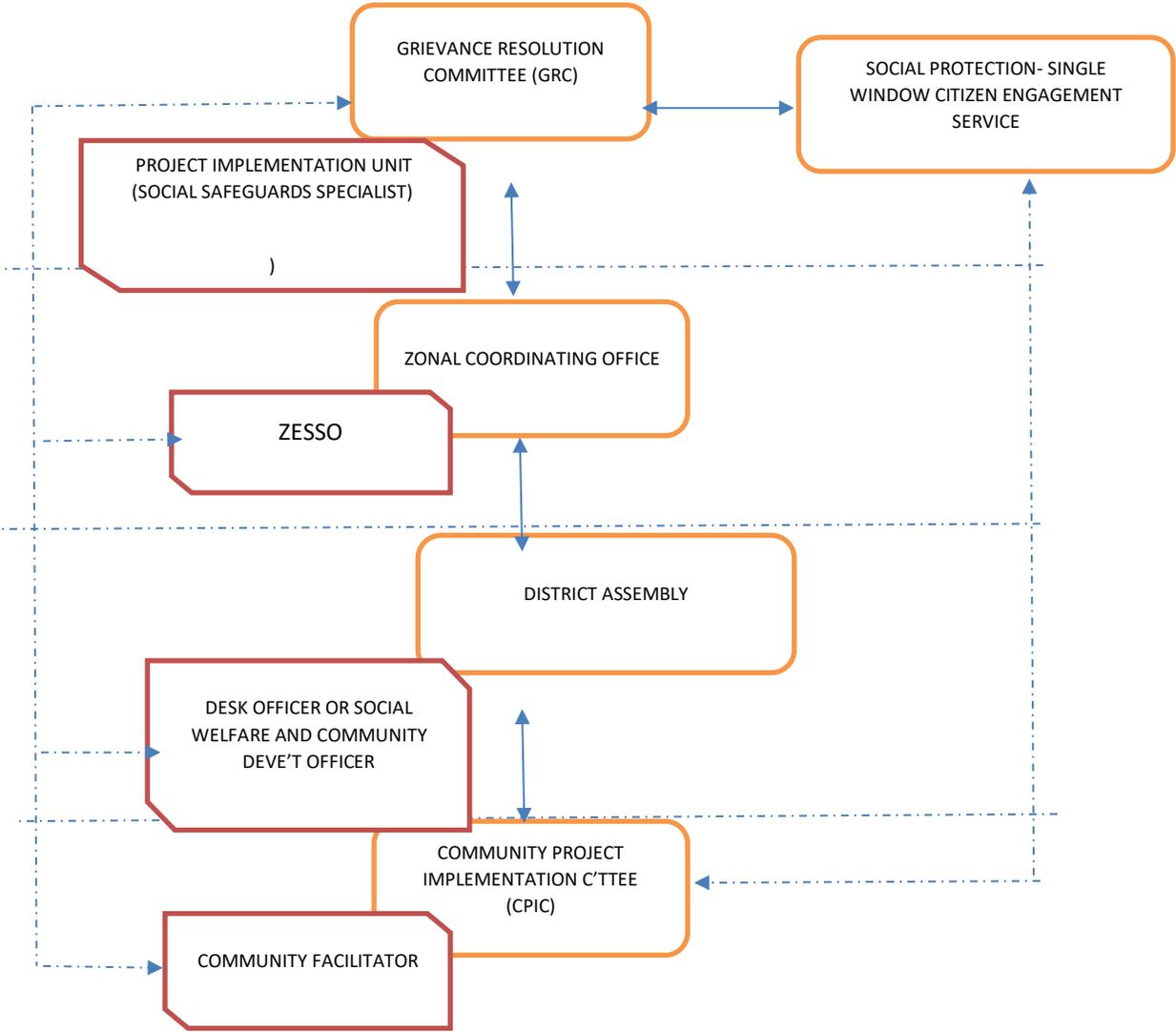


Figure 3: Framework of the SOCO Grievance Mechanism

1.8.1 Receiving cases under the GM

The SOCO (GBV) SEA-SH system will receive cases directly from a survivor (or complainant, especially if a minor is involved), through the SWCES, or through any of the multiple channels made available for (GBV) SEA-SH reporting. These other channels are walk-in, a dedicated hotline, an SMS/WhatsApp line, email, a GBV Services Provider, the PIUs, the ZCOs, SOs, Focal Persons and the community facilitators.

Every entry point (recipient of a complaint) will undertake the following procedure, using an established standardized report form in line with a survivor centered approach according to their wishes. The case will be logged into the system as received, in accordance with the protocol on what information to record in the system.

- i. Getting the details of the survivor of (GBV) SEA-SH
- ii. Documenting the details of the case
- iii. Refer survivor to appropriate service providers for (GBV) SEA-SH related services
- iv. Support Survivor to ensure access to services
- v. Coordinate with service providers/duty bearers to ensure GBV/ SEA/ SH Cases are appropriately managed and survivors access appropriate services

The details of the survivor and case logged in will comprise no more than the following:

- i. The age and sex of the survivor, if it is possible to get such information from the survivor
- ii. The nature of the complaint, according to what the survivor says
- iii. Whether, in the knowledge of the survivor, the alleged perpetrator is associated with the Project
- iv. Whether the survivor has been referred to services

After logging in this information, the Social Safeguards Specialist (SSS), or any other assigned staff of the SOCO Project, who has the responsibility of handling (GBV) SEA-SH cases takes over the processing of the complaint, assessing further to ascertain whether as a project-related case, the alleged perpetrator is connected to a contractor on the project; or whether it is a case originating from any of the adjoining Project communities or work sites. The SSS acts irrespective of how the case is related to the Project.

The SSS (and other personnel mentioned in the (GBV) SEA-SH Implementation Framework), will be trained to be conscious of their attitudes, approaches and manner of speech in the performance of their roles and when interacting with survivors. This will enhance the confidence in the SOCO, and its survivor focus on handling GBV SEA/ SH issues. They will be trained to self-check and ensure the following when interacting with survivors:

- Welcome the survivor warmly, acknowledging the strength and courage it took to reach out for help.
- Use language that is neither overtly nor covertly blaming.
- Share all information on hand with the survivor so they can make the best decisions in the interest of their welfare.
- Listen to the survivor's expression of how he/she feels, what they think, and what they would like to do.

- Explore all feasible options with the survivor and inform them of all available resources.
- Respect the survivor’s decisions, even if it differs from what would have made or wanted them to make.
- Respect the survivor’s privacy and the right to withhold information.
- Inform the survivor about the policies and procedures of the services being provided

1.8.2 Referrals under the GM

The GM while ensuring that cases are resolved does not manage all cases. The sensitivity of GBV cases requires specific and professional help to ensure minimized trauma and recovery of survivor. Therefore, referral mechanisms are in place to ensure that the survivor receives the right attention on the issue.

When there is the need to refer a case, The SSS or the case officer assures the survivor of confidentiality, discusses the options available and provides all the information necessary to the survivor for her to take an informed decision. With the consent of the survivor, the case officer refers the case to the appropriate mechanism for handling the matter. These referral mechanisms may be:

1. The contractor/employer of the alleged perpetrator for resolution through the employer’s internal resolution system.
2. A GBV Services Provider whose information is already available on the Grievance System for support, while the internal resolution mechanism of the perpetrator’s employer is working to address the matter. The GBV Services Provider supports the survivor through the processes until its resolution.
3. A GBV Services Provider who takes up the case, with the consent of the survivor and works to resolve it through their processes, or in conjunction with other agencies in the national response system (legal, psycho-social, health, judicial, shelters etc.).

The SSS will monitor and track the case through the grievance system, during the processes of resolution. When cases are resolved, the SSS is to record the cases that have been resolved. The case officers will only be encouraged to have only basic records the case and its resolution available and the date of the resolution and close the case. All other details of the cases are sealed until required.

1.8.3 Specific Roles Of Actors Under The GM

Social Safeguard Specialist (SSS) / Environmental and social Safeguard Officers(E&SS) in the GM receiving and processing of (GBV) SEA-SH cases reported to the Project. The SSS will:

The Social Safeguard Specialist (SSS) supported by the Zonal E&SS Officers directly in the receiving and processing of (GBV) SEA-SH cases reported to the Project. The SSS will:

1. Receive all GBV cases reported, whether directly or from any of the available reporting channels, whether project related or not, and that all such survivors receive equal treatment and referrals as appropriate
2. With the consent of the survivor, provide the survivor with information on their options and makes decisions regarding the processing and resolution of the case as stated above
3. Communicate to the survivor any mandatory legal reporting requirements depending on the nature of the case

4. Communicate with survivors that there will be no compensation or financial redress if their case is referred to the Project for internal resolution. However, they are free to pursue other available remedies such as using the legal system or the services of a GBV Services provider
5. Make the appropriate referral either to an internal Project resolution mechanism or a GBV Services Provider, or both, with the consent of the survivor
6. Monitor, track, follow-up cases or supervise resolution as appropriate
7. Record each resolved case in the GM and close it

Services Providers (SPs)

GBV Services Providers within the beneficiary SOCO Project regions will be mapped and integrated into the (GBV) SEA-SH system of the SOCO Projects GM. These include legal, health, psychological/mental health, judicial services, social welfare, NGOs and shelters. Both state and non-state agencies that are available, accessible and can be used as both entry points and referral agencies for (GBV) SEA-SH cases. To this end, these GBV SPs will:

1. Be trained on the principles guiding (GBV) SEA-SH work as outlined by the SOCO Project
2. Be used as entry points for reporting by survivors and bring such (GBV) SEA-SH project-related reports to the notice of the Grievance system for logging into the system.
3. Be used as referral agencies for survivors by the GM through its SSS.
4. Have their own case management support system for processing (GBV) SEA-SH cases which enables the agency to facilitate resolution, including interagency referrals.
5. Provide the essential services required to support survivors.
6. Maintain confidentiality, safety and security of survivors in accordance with best practice ensuring survivor-centeredness through the processes and seeking the consent of the survivor when personal data must be shared with any other agency
7. Co-operate with the SSS of the SOCO Project when they follow-up to know the status of the case
8. Inform the SSS of the SOCO Project when a case has been resolved so it is recorded by the GM and closed.

Contractors, Sub-Contractors, Consultants and workers

All Contractors (Consultants, sub-contractors, suppliers, etc., and their employees and workers) hired for services on the SOCO Project are bound to the principles outlined for (GBV) SEA-SH Prevention and Response measures and to operationalize the requirements of the (GBV) SEA-SH Prevention and Response Framework and Action Plan To this end, all Contractors, Sub-Contractors, Consultants, and workers shall:

1. Go through the procurement and bidding processes with the understanding that they must satisfy the requirements of mitigating, preventing and responding to (GBV) SEA-SH at their contractor Firm level.

2. Sign the Codes of Conduct prepared by the PIU before the contract documents are completed and signed by the parties.
3. Develop/adopt their CoCs and policies and procedures on (GBV) SEA-SH for their workforce and employees to sign on.
4. Sensitize and train their management and workers on (GBV) SEA-SH and compliance with the CoCs and policies
5. Agree to participate in the grievance mechanism of the SOCO Project as entry points for reporting of (GBV) SEA-SH cases
6. Ensure that cases so reported by survivors are brought to the attention of the Safeguards Team and logged into the UCMS
7. Ensure their readiness to address a case of (GBV) SEA-SH referred to the Firm by the SSS alongside the SPs
8. Have dedicated personnel (internal grievance/resolution mechanism) to address (investigate, mediate, sanction) an employee for (GBV) SEA-SH should a case be reported.
9. Train dedicated personnel on how to investigate and take decisions fairly and appropriately in (GBV) SEA-SH matters.
10. Co-operate with any GBV Services Provider whom the team has requested to provide support to the survivor during the handling of the matter at the contractor level
11. Investigate and apply appropriate sanctions to perpetrators in accordance with the Contractor's CoC and (GBV)SEA-SH policy and procedures, ensuring that such decisions conform with Ghana's Labour Act and other relevant legislation
12. Ensure that the protection, safety and confidentiality of the survivor is central to all their processes
13. Ensure a fair hearing of the matter concerning the alleged perpetrator in the bid to determine the veracity of the said allegations
14. Report to the assigned Safeguards personnel when the case is resolved for onward logging by the Grievance system

1.9 List of GBV Service Providers in and around the districts:

GBV Service Providers identified in each of the 48 beneficiary MMDAs across the 6 Regions will be mapped out for project support. Service providers will be identified in the areas of Health, Judicial, Law Enforcement, Psychosocial and Legal Aid. The list shall include the Gender Desk Offices at the regional Offices, DOVVSU, CHRAJ, Ghana Health Service and Traditional Authorities. The Domestic Violence and Victims Support Unit (DOVVSU) Secretariat which serves as the coordinating Unit of all (GBV) SEA-SH activities in Ghana will also be included in this directory. The SOCO Project PIU (including ZCOs and SOs) will also be listed in this directory to Aid in the operationalization of the GM.

1.10 Protocols for Referral Process

In referring GBV (SEA-SH) cases, the importance of minimizing further trauma to the survivors must be emphasized, and the efficiency of professionals who are in place to support them must be

maximized. In view of this, a Referral Protocol which outlines a clear reporting and referral system between the participating actors will be drafted to enable (GBV) SEA-SH survivors know to whom they should report and what sort of assistance survivors can expect to receive from GBV SPs.

The Ministry of Gender Children and Social Protection (MoGCSP) has developed GBV referral pathways outlined below. These will be promoted and adopted on SOCO and among its key stakeholders to build systematic response to the support needs of GBV survivors. The MoGCSP’s referral pathways are presented in as in Annex 1 The diagram denotes the referral pathways to be followed at the first point of contact i.e., when the child or woman victim of abuse first presents for help and/or to report an incident of abuse

GBV SPs will play an especially vital role in relation to the SOCO Project. GBV Service Providers in the SOCO Project regions will be mapped and integrated into the SOCO (GBV) SEA-SH GM of the SOCO. The GBV SPs include legal, health, psychological/mental health, judicial services, social welfare, NGOs and shelters etc., both state and non-state agencies that are available, accessible and can be used as both entry points and referral agencies for (GBV) SEA-SH cases. A simplified Referral system protocol between the SOCO project, Referral agencies and SPs is below

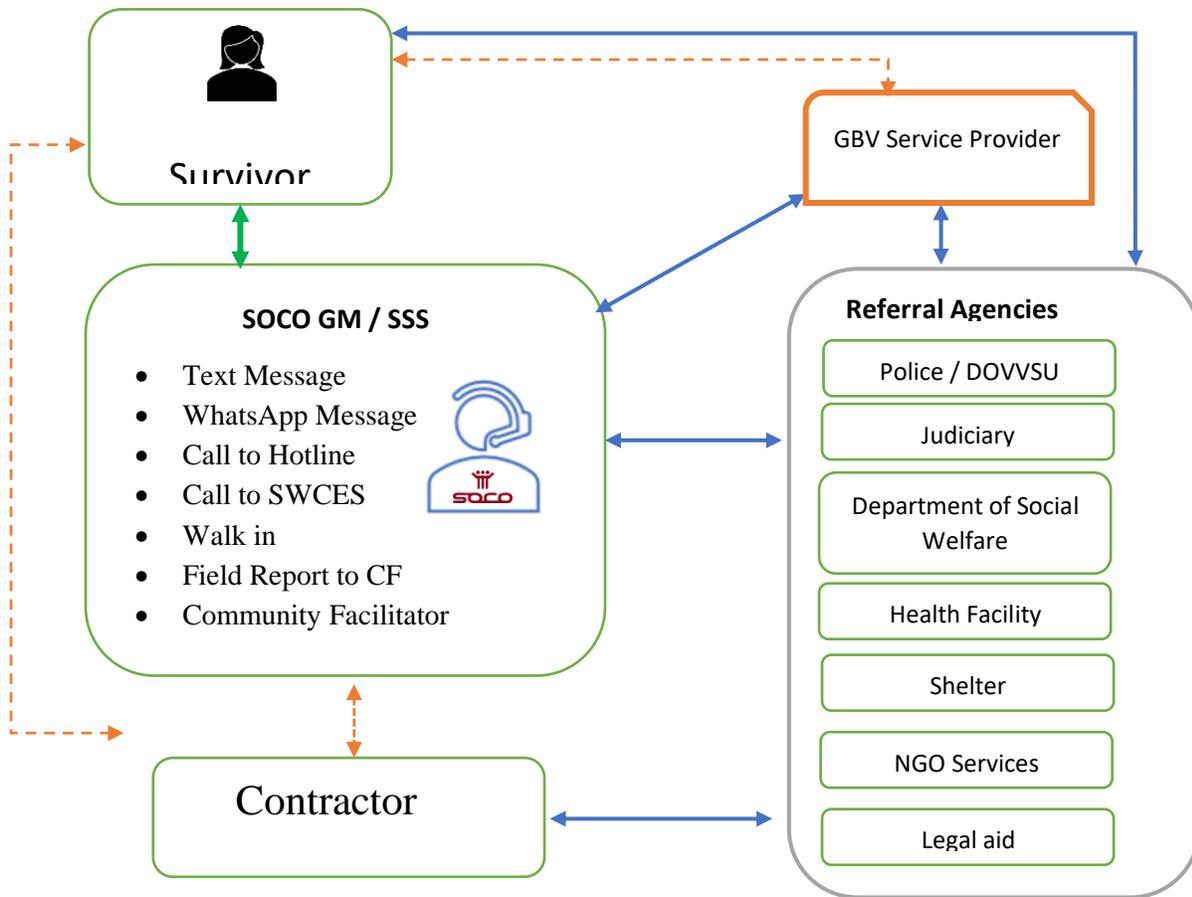


Figure 4: Abbreviated Refereall system under SOCO

1.11 Integrating GBV/SEA/ SH Contractors' Obligations

In addition to the social management plan, the contractor shall develop a (GBV) SEA-SH action plan⁷ to prevent any form of violence directed at a person because of their gender or vulnerability. It is as summarized in Table 3.

Table 3: (GBV) SEA-SH Prevention and Response Action Plan

Strategy	Description	Tailored actions/measures
Assess and prepare	Assess sub project context for risks and vulnerabilities for GBV. Assess and document contractor's ability to understand and act on gender gaps in the workforce, and put in place staff, structures and plans to address these issues	<ul style="list-style-type: none"> • Understand and identify incidents and the prevailing climate for GBV and SEA. • Understand how the contractor's operations may be impacting (GBV) SEA-SH in the host communities • Attend Pre-tender training organized by the PIU for firms and assist interested firms in assessing and understanding the Labour-intensive models
Address	Take specific practical actions to increase gender diversity, inclusion and equitable opportunities and work distribution	<ul style="list-style-type: none"> • Develop employee policies and Code of Conduct for addressing (GBV) SEA-SH • Develop contractor level and individual code of conduct to prevent, report and address (GBV) SEA-SH • Train workers on (GBV) SEA-SH • Consult with local communities and project on the project activities, how to report complaints, as well as GBV support services;
Monitor and sustain	Develop appropriate reporting mechanisms for tracking and addressing GBV complaints	<ul style="list-style-type: none"> • Implement a tailored GM and GBV tracking system based on clear indicators. • Co-operate with the Safeguards Team in their monitoring and supervisory role in respect of a case

Others will include.

- Ensure development of (GBV) SEA-SH Training Plans by all Project Contractor
- Train Project Contractors' designated personnel for investigating and handling SEA and SH
- Complaints
- Training for all Project Contractors' staff (Employees and all categories of workers) on (GBV) SEA-SH
- Installation of good lighting systems at the construction work camps.
- Project sites should provide separate toilet and showering facilities for males and females with clear signage.

⁷ Simplified document template provided by the PIU/ Assembly as part of procurement document

- Ensure that the Contractor understands all other roles and responsibilities within the (GBV) SEA-SH prevention, mitigation and Response framework.

1.12 Data Protection and handling confidential information.

The SOCO Project's will ensure that data and information on (GBV) SEA-SH are safely collected, stored, and analyzed when cases are reported, in order that such data can be shared in safe and ethical ways with other agencies and SPs. To this end, the Project will:

- Protect the data of all survivors and share only with those who are authorized to obtain such information
- Share survivor information only within the context of a referral, with the informed consent of the survivor. (See annex 2 and 3)
- As far as possible, anonymize survivor data when sharing such data with non-GBV Service Provider agencies and organizations (e.g., the World Bank, Implementing agency, other referral agencies and national coordinating agencies for GBV and social protection). It will exclude names, contact info, or other identifiers)
- Adopt a protocol with GBV SPs to determine how such data and information are to be stored, shared, and used.

1.13 Awareness Raising and Community Stakeholder's Engagement

The PIU will incorporate the zero tolerance for (GBV) SEA - SH in its sensitization activities. Sensitization campaigns will include: relevant information on the grievance system in place, reporting channels, available services providers, and our emphasis on Zero Tolerance for (GBV)SEA-SH. It will also create awareness among staff and beneficiaries on the code of conduct and its relevance in prevention of GBV (SEA-SH) in the project environment.

Publicity strategy will include.

Inclusion in Design, Development and Dissemination of Project IEC materials

⁸The PIU will ensure that IEC materials developed for project communication will include the channels of reporting of all grievance including GBV.

Publication of mechanisms of reporting in beneficiary communities and stakeholders. Introduce and make accessible systems of reporting and referral pathways to project communities, stakeholders and the GM.

⁸ Photo credit: Ark Foundation, 2020

1.14 Training and capacity building for project actors

The SOCO Project Team will be trained on handling (GBV) SEA-SH cases which will include:

- i Prevention, Mitigation and Response framework as well as responsibilities and reporting; Confidentiality and Survivor-centeredness
- ii Protection of witnesses and whistle-blowers
- iii Procedures requirements, including legal requirements
- iv Referral processes and role Service Providers mapped under the SOCO project on (GBV)SEA-SH.

The PIU will also develop and design a (GBV)SEA-SH Training Manual to help in capacity building of project staff and service providers. It will also develop and undertake a Training of Trainer (ToT) sessions on (GBV) SEA-SH to equip Zonal staff and district focal persons to train and provide support to firms and communities.

The Project will offer as part of the pre-tender⁹ training and orientation, training for management of the prospective projects contractors on (GBV)SEA-SH policy and CoCs .All Contractor’s workers, supervisors and managers will be trained on GBV and SEA prior to commencing work to reinforce their understanding of the GBV and SEA Code of Conduct (CoC). At the minimum, the training will focus on:

- i. Definition of GBV, particularly SEA and sexual harassment, and how the project can exacerbate GBV risks;
- ii. National legislations on GBV;
- iii. Cultural sensitization regarding engagement with local community;
- iv. Roles and responsibilities of actors involved in the project (the standards of conduct for project-related staff captured in CoC);
- v. Case reporting mechanism, accountability structures, and referral procedures within agencies and for community members to report cases related to project staff;
- vi. Services available for survivors of GBV;
- vii. Follow-up activities to reinforce training content.

1.14.1 Training

Training and refresher training specified in the (GBV) SEA-SH Prevention and Response Action Plan will be organized at the various levels of implementation to build the capacities of the Implementation agency, Project Team, the Project contractors, and employees, sub-contractors etc. The district focal person and the E&S officer will ensure the training course is repeated on a regular basis as fresh staff join the project at various levels.

1.15 Monitoring and Reporting

The Social Safeguards Specialist, Environmental and Social Safeguards Officers, GBV Focal Persons and Community Facilitators will oversee monitoring of this Gender-Based Violence, Sexual Exploitation and Abuse and Sexual Harassment Action Plan at the National, Zonal District and community levels, respectively. There will be quarterly field monitoring by the Zonal officers and focal Persons to assess project affected persons and stakeholder knowledge and patronage of

⁹ Training

the GM platforms. The GBV (SEA-SH) Checklist (See Annex 6) will be used to collect data from project actors to assess the GBV issues during the implementation activities.

A comprehensive M&E indicator for the project (GBV)SEA-SH Prevention and Response system and activities will be developed (including those in Results Framework). These indicators will be monitored as follows:

- i. Regular monthly monitoring of progress on (GBV) SEASH prevention and response activities within the project sites and contractors' workforce, and SOCO Staff.
- ii. Annual review of the GM and the (GBV)SEA-SH system,
- iii. Annual review of the implementation of CoCs and the (GBV) SEA-SH policies and procedures at Firm/ contractor level and Community monitoring must be established using simple action community monitoring approach (most significant change approach)
- iv. PIU will also conduct Mid-Project Evaluation and end of year of (GBV) SEA-SH Prevention and Response system and activities

The safeguards team shall audit the Firm's (GBV) SEA-SH action plan to ensure its adequacy in preventing and responding to GBV as well as the type of training to be offered to workers to prevent GBV/SEA. Monitoring activities will focus on the following areas:

1. **Policy compliance:** The Firms' enforcement of the policies and regulations enshrined in their GBV SEA/ SH prevention mitigation and Response Framework and their CoC
2. **Gender segregation:** provision of segregated gender-based facilities such as toilets and considerations for sex disaggregation of the responsibilities assigned to each worker at the project site
3. **Access to list of GBV service providers in and around the districts:** while furnishing the Firm with IEC materials they will continually be encouraged to use the services of experts in the field such as local agencies, such as DOVVSU, CHRAJ and GHS responsible for GBV issues as well as local NGOs
4. **Training:** the safeguards team shall guide the contractor in the organization of periodic trainings/workshops, designed to build knowledge and skills of both workers and the affected communities on dangers on Gender Based Violence and Violence against Children. Practical approaches including interactive teachings, role plays, simulations and other group learning activities shall be encouraged for effective outcomes.

4. THE SOCO GBV (SEA-SH) PREVENTION AND RESPONSE ACTION PLAN

Table 4: The GBV (SEA-SH) Preention and Response Action Plan

S/N	Activity	Actions	Outcome	Timeline	Responsibility	Monitoring	Budget
1	Map out GBV/SEA prevention and response service providers						
a)	Map out and review capacity and quality of GBV/SEA service Providers in the project area	<ul style="list-style-type: none"> Conduct field visit to District Assemblies to collect data on key actors and service providers on GBV/SEA 	GBV Service Provider Map	Q1, 2023	PIU/ MLGDRD/ MMDA Focal persons/ RCC focal persons	Annual	
b)	Adopt the multisectoral GBV/SEA referral pathway(s) from MoGCSP in line with the National Systems and guidelines, to the SOCO GBV/ SEA/SH framework	<ul style="list-style-type: none"> On the basis of mapped GBV/SEA prevention and response service providers compare and analyze referral outline with the MoGCSP referral framework for service providers 	Referral pathway developed Adapted and adopted.	Q1, 2023	PIU/MLGDRD/Mo GCSP/SPs		

S/N	Activity	Actions	Outcome	Timeline	Responsibility	Monitoring	Budget
		<ul style="list-style-type: none"> Adopt the Framework where suitable to SOCO 		Q1, 2023	PIU/MLGDRD/Mo GCSP/SPs		
		<ul style="list-style-type: none"> Disseminate the referral pathway/list to stakeholders including service providers 	Adopted Referral pathway document Disseminated to all SPs, Focal Persons and	Q1, 2023	SSS/ESS Officers/ Communication Specialist		
2	GBV/SEA/SH sensitive channels for reporting in GM						
a)	Identify additional channels for reporting GBV/ SEA/SH	<ul style="list-style-type: none"> Undertake internal review of GM for GBV/SEA for entry pathways for reporting 	GM reviewed for sensitivity to GBV/SEA reporting	Q1, 2023	PIU/MLGDRD/Mo GCSP/SWCES	Annual	

S/N	Activity	Actions	Outcome	Timeline	Responsibility	Monitoring	Budget
		<ul style="list-style-type: none"> Integrate additional PIUGBV/SEA entry points within the GM with clear procedures 	GBV/SEA procedure integrated in the GM	Q1, 2023	PIU/MLGDRD/Mo GSCP/SWCES		
b)	Nominate GBV/SEA/SH focal points within the GM who will be responsible for GBV/SEA cases and referrals to the other relevant stakeholders as defined in the referral pathway.	<ul style="list-style-type: none"> Identify and select GBV/SEA focal persons within the GM (National, Regional District, Community) 	GBV focal points nominated and trained	Q1 and Q2 2023	PIU/MLGDRD/M MDAs/ZCOs/SOs/RCCs/CFs/SWCES/SPs	Annual	
		<ul style="list-style-type: none"> Clarify the role of the focal points in GBV/SEA as referral points 	Focal Persons sensitized on their roles	Q1 and Q2 2023	PIU/MLGDRD/M MDAs/ZCOs/SOs/RCCs/CFs/SWCES/SPs		

S/N	Activity	Actions	Outcome	Timeline	Responsibility	Monitoring	Budget
3	Define and reinforce GBV/SEA/SH requirements in procurement processes and contracts						
a)	Incorporate GBV/SEA/SH Requirements and expectations in all bid documents and contracts	<ul style="list-style-type: none"> Clearly define SEA/SH requirements and expectations in the bidding documents 	SEA/SH requirements integrated in bidding	Q1 and Q2, 2023	PIU/MLGDRD/MMDAs/ZCOs/SOs	Annual	
		<ul style="list-style-type: none"> Incorporate (GBV) SEA-SH issues in all contracts signed by contractors and consultants 	(GBV) SEA-SH standards incorporated in procurement /contract document	Q1 and Q2, 2023	PIU/MLGDRD/MMDAs/ZCOs/SOs/Contractors	Incorporate (GBV) SEA-SH issues in all contracts signed by contractors and consultants	
b)	Workers (Contractor/consultant) sensitization on GBV/SEA.	<ul style="list-style-type: none"> Develop a training plan for workers, contractors, and consultants 	Training plan developed.	Q2 2023	PIU/MLGDRD/MMDAs/ZCOs/SOs/Contractors	Annual	
c)	Sign Codes of Conduct by relevant Stakeholders	<ul style="list-style-type: none"> Prepare CoC for Project Staff 	CoC for Project staff prepared	Week of Jan 23	SSS/PC/IA	annual	
		<ul style="list-style-type: none"> Project Staff Given CoC for signing 	All PIU Zonal and MMDA staff Sign CoC	Week of Jan 23		Annual	

S/N	Activity	Actions	Outcome	Timeline	Responsibility	Monitoring	Budget
		<ul style="list-style-type: none"> Define GBV (SEA-SH) requirements to be included in the CoC which addresses GBV/SEA/SH 	All GBV (SEA-SH) requirements for CoCs defined	Week of Feb 23	SSS/ procurement Specialist	annual	
		<ul style="list-style-type: none"> Prepare templates on GBV (SEA-SH) for Contractors to incorporate into their CoCs 	Templates for GBV (SEA-SH) for contractors' CoCs prepared	Week of Feb 23	SSS/ procurement Specialist	Annual	
		<ul style="list-style-type: none"> Have CoCs signed by all those with a physical presence at the project site. 	CoCs Signed by	During Project implementation	Contractor/ MMDAs/ ZCOs procurement Specialist	Quarterly	
4	Training and Capacity Building of Project Actors						
a)	Build capacity of the SOCO Project Team, Service Providers and Contractors	<ul style="list-style-type: none"> Develop (GBV)SEA-SH Training Manual 	(GBV)SEA-SH Training Manual developed.	Q2 2023	PIU/ ZCOs/ MMDAs/ RCCs		
		<ul style="list-style-type: none"> Sensitize and Train the SWCES personnel on 	Training and sensitization for SWCES Staff on	Q2 2023	PIU/ PIU/ ZCOs/SWCES		

S/N	Activity	Actions	Outcome	Timeline	Responsibility	Monitoring	Budget
		SOCO GBV SEA SH framework, referral systems and SPs under the project	GBV SEA SH conducted.				
		<ul style="list-style-type: none"> Train and sensitize SOCO personnel designated for responding to reports on safety, security, and confidentiality 	SOCO Project team trained to implement the GBV SEA-SH Prevention and Response activities	Q2 2023	PIU/ ZCOs		
b)	Develop (GBV)SEA-SH Training of Trainers' (TOT) PowerPoint and Briefing Notes for SOCO Team	<ul style="list-style-type: none"> Create Training material for ToT sessions 	Content (TOT PowerPoint and Briefing notes) developed and available for use to train the Project Team, Contractors and other stakeholders.	Q2 2023	PIU/ ZCOs/ SWCES	Bi-annually	
		<ul style="list-style-type: none"> Identify and select Trainers at National, Regional and District Level 	Trainers selected and trained				

S/N	Activity	Actions	Outcome	Timeline	Responsibility	Monitoring	Budget
		<ul style="list-style-type: none"> Train selected training Team (Safeguards team, PIU, ZCOs MMDA Focal Persons and CFs)Focal Persons at on how train other persons on (GBV)SEA-SH 		Q2 2023			
c)	Build Capacity of contractors	<ul style="list-style-type: none"> Train all Project Contractors' Management on (GBV)SEA-SH, CoCs and Policy and procedures requirements, including legal requirements 	Contractors can address (GBV) SEA-SH through their internal mechanisms and in accordance with the local laws	Q2 2023	SSS/ PIU/ MMDAs Procurement Specialist/ZCOs		
d)	Train Service Providers on the SOCO project and its (GBV) SEA-SH prevention and response framework	<ul style="list-style-type: none"> Training of Service Providers mapped under the SOCO project on GBV SEA SH 	Service providers have enhanced understanding on the SOCO project and its (GBV) SEA-SH prevention and		PIU		-

S/N	Activity	Actions	Outcome	Timeline	Responsibility	Monitoring	Budget
			response framework.				
5	Awareness Creation and community Stakeholder Engagement						
a)	Develop a Stakeholder Engagement plan for GBV SEA/SH	Develop/ extract a GBV/SEA Stakeholder Plan from the Broader SOCO Stakeholder Engagement Plan.	Stakeholder Implementation plan developed	(GBV) SEA-SH Stakeholder Engagement Plan developed	Q2 and Q3 2023	PIU/ZCOs and SOs	Bi-annual
b)	Incorporate GBV Messaging into Communication / information dissemination strategy	<ul style="list-style-type: none"> Ensure Project Messaging effectively communicates Grievance systems and GBV SEA-SH channels for reporting 	A GBV/SEA communication embedded in project communication		PIU / ZCOs/MMDAs		
c)	Stakeholder consultations / Engagements	<p>Based on the Project Stakeholder's Engagement Plan</p> <ul style="list-style-type: none"> Develop interview/ facilitation guides 	Stakeholders consulted	Q1 2023	PIU/MLGDRD/MMDAs/ZCOs/SOs	Annual	

S/N	Activity	Actions	Outcome	Timeline	Responsibility	Monitoring	Budget
		<ul style="list-style-type: none"> Undertake regular engagement sessions with local community partners comprising local Civil Society organizations, NGOs, CBOs and FBOs, women's organizations, traditional authorities, and others in the project communities 	Stakeholders engaged on GBV/ SEA/ SH	Q1, Q2, Q3 and Q4 2023	PIU/MLGDRD/MMDAs/ZCOs/SOs	Quarterly	
d)	Establish a dedicated and committed network of community focal persons with complete understanding of GBV (SEA-SH)	<ul style="list-style-type: none"> Sensitize community Facilitators and focal persons and for GBV/SEA/ SH 	Focal points/persons identified and trained	Q1, Q2, Q3 and Q4	SOCO Trainers, MMDAs		

S/N	Activity	Actions	Outcome	Timeline	Responsibility	Monitoring	Budget
6	Monitoring And Evaluation						
a)	Develop M&E Indicators	<ul style="list-style-type: none"> Develop M&E Indicators) for the Project (GBV)SEASH Prevention and Response system and activities 	M&E Indicators	Q1 2023	PIU/ZCOs/SOs/MMDAs	Monthly	
b)	Field monitoring Activities	<ul style="list-style-type: none"> Undertake regular monthly monitoring of progress on (GBV) SEA-SH prevention and response activities within the project sites and contractors, and at the level of the PIUand the Community Facilitators 	Monitoring Reports, Pictures Community Feedback recorded	Q2 2023	PIU/ZCOs/SOs/MMDAs		

S/N	Activity	Actions	Outcome	Timeline	Responsibility	Monitoring	Budget
c)	Review of GM	<ul style="list-style-type: none"> Undertake annual review of the GM and the (GBV)SEA-SH system 	Information is integrated into the system for better outcomes and impacts	Q4 2023	PIU/ZCOs/SOs/MMDAs/SWCES	Annual	
d)	Review GM reports/logs for GBV/SEA sensitivity	<ul style="list-style-type: none"> Review logs for GBV/SEA documentation to ensure it follows standards for documenting GBV/SEA cases 	Number of GBV/SEA cases documented disaggregated by channels of reporting	Q4 2023	PIU/ZCOs/SOs/MMDAs/SWCES	Monthly	
e)	Monitor Contractors' implementation and adherence	<ul style="list-style-type: none"> Conduct an annual review of the implementation of CoCs and the (GBV) SEA-SH policies and procedures at contractors Level 	Information is used to improve response and practice; survivors are increasingly satisfied	Q3 2023	PIU/MLDGD/ZCOs/SOs/MMDAs	Annual	
f)	Monitor effectiveness of sensitization and trainings at Community Level	<ul style="list-style-type: none"> Establish and incorporate simple action-oriented community monitoring 	Community interest and participation in addressing ((GBV) SEA-SH improved	Q4 2023	PIU/ZCOs/SOs	Annual	

S/N	Activity	Actions	Outcome	Timeline	Responsibility	Monitoring	Budget
		approaches for M&E					
g)	Evaluate impacts of the (GBV)SEA-SH prevention and response activities on the SOCO project	<ul style="list-style-type: none"> Conduct Mid-Project Evaluation of (GBV) SEA-SH Prevention and Response system and activities 	(GBV) SEA-SH Prevention and Response improved	Mid-Term	MLGDRD/PIU/WB	Mid-Term	
h)	Evaluate outcomes and impacts of the (GBV)SEA-SH prevention and response activities the SOCO project	<ul style="list-style-type: none"> Conduct end of Project Evaluation to include (GBV) SEASH Prevention and Response system and activities 	Lessons shared with stakeholders; learning by stakeholders, incorporated into new projects and improving existing systems.	End of the Project lifespan	MLGDRD/PIU/WB	End of Project evaluation report	
7	Networking and Partnership						

S/N	Activity	Actions	Outcome	Timeline	Responsibility	Monitoring	Budget
a)	Identify and Establish Partnerships	<ul style="list-style-type: none"> Identify linkages with other local projects and programs Ministries, Departments and Agencies (MDAs), local government initiatives and community initiatives to find common ground in the Prevention and Response of GBV/ SEA/ SH e.g. (MoGCSP) 	<p>Project Interest Groups identified and mapped.</p> <p>Heightened consideration for and adoption of (GBV) SEA-SH</p> <p>Prevention and Response mechanisms and processes in other agencies</p>	Q1 – Q4 2023	WB/ IA/ PIU	Annual	
		<ul style="list-style-type: none"> Leverage on development Partners Forum to streamline synchronize approaches to GBV/SEA /SH mitigation and response on projects being implemented Northern Ghana 	Partnerships established with some Project implementing DPs on Implementing GBV (SEA-SH)	Q1 – Q4 2023	WB/ IA/ PIU	Annual	

S/N	Activity	Actions	Outcome	Timeline	Responsibility	Monitoring	Budget
		to obtain synergies.					

ANNEXES

Annex 1: Ministry Of Gender Children And Social Protection framework for Referral of GBV cases



Annex 2: Consent Forms for Services

CONFIDENTIAL CONSENT FOR SERVICES

This form should be interpreted to the survivor in a language he/she understands This form is kept strictly confidential and is filed in a separate case file or log.

Specialist/assigned staff of the SOCO Project Grievance Mechanism (GM) and the survivor who has reported a (GBV) SEA-SH incident, for the purposes of discussing the options the survivor could exercise for referrals to available services, and to obtain the consent of the survivor for referral to the appropriate agency or service provider for handling the matter.

I, _____ (name of survivor), hereby give permission to be referred by the Social Safeguards Specialist/assigned staff _____(name of agency or service provider (s)). I understand that I will be treated with dignity and respect. All information I give to the Social Safeguards Specialist/assigned staff and to the service provider I am being referred to will be handled with confidentiality. I also understand that if I express thoughts of harming myself or another person, then the Social Safeguards Specialist/assigned staff or the service provider handling my case can take action to protect me or others around me, which action may include breaching the confidentiality rule in my best interest.

Signature or Thumbprint of survivor: (or parent/guardian if the survivor is under 18)

Date: _____

Annex 3 : Disclosure Form

CONFIDENTIAL DISCLOSURE FORM

This form should be read to the survivor in a language he/she understands.

This form strictly confidential and is filed in a separate case file or log.

I, _____ (name of survivor), give my permission for the SOCO Project Social Safeguards Specialist/assigned staff to share information about the incident I have reported to them as explained below:

1. I understand that in giving my authorization below, I am giving the SOCO Project Social Safeguards Specialist/assigned staff permission to share the specific case information from my incident report with the agency or service provider(s) I have consented to be referred to, so that I can receive the necessary help.
2. I understand that shared information will be treated with confidentiality and respect and shared only as needed to provide the assistance I request.
3. I understand that releasing this information means that the staff of the agency or service provider I have been referred to will work with me towards a resolution of the case. I understand also that I have the right to change my mind about sharing information with the agency or service provider I have consented to be referred to.
4. I have also been informed and understand that some non-identifiable information may also be shared for the purposes of reporting. Any information shared will not be specific to me or the incident. I understand also that shared information will be treated with confidentiality and respect.

Signature or Thumbprint of survivor: (or parent/guardian if the survivor is under 18)

_____ Date: _____

Annex 4a : Code of Conduct for service providers/ contractors

Code of Conduct for Service Provider's Personnel Form (ES)

We are the Service Provider, [enter name of Service Provider]. We have signed a contract with [enter name of Employer] for [enter description of the Services]. The Services will be carried out at [enter the locations in the Employer's country where the Services are required, as applicable]. Our contract requires us to implement measures to address *environmental and social risks* [**Note to Employer:** depending on the nature of the contract and assessed risks, this may be replaced with social risks], related to the Services.

Note to the Bidder:

The minimum content of the Code of Conduct form as set out by the Employer shall not be substantially modified. However, the Bidder may add requirements as appropriate, including to consider Contract-specific issues/risks.

The Bidder shall initial and submit the Code of Conduct form as part of its bid.

This Code of Conduct is part of our measures to deal with environmental and social risks [**Note to Employer:** depending on the nature of the contract and assessed risks, this may be replaced with social risks] related to the Services.

All personnel that we utilize in the execution of the Services, including the staff, labour and other employees of us and each Subcontractor, and any other personnel assisting us in the execution of the Services, are referred to as Service Provider's Personnel.

This Code of Conduct identifies the behaviour that we require from the Service Provider's Personnel employed for the execution of the Services at the locations in the Employer's country where the Services are provided.

Our workplace is an environment where unsafe, offensive, abusive or violent behaviour will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation.

REQUIRED CONDUCT

Service Provider's Personnel employed for the execution of the Services at the locations in the Employer's country where the Services are provided shall:

1. conduct his/her duties competently and diligently.
2. comply with this Code of Conduct and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and well-being of other Service Provider's Personnel and any other person;
3. maintain a safe working environment including by:
 - a. ensuring that workplaces, machinery, equipment and processes under each person's control are safe and without risk to health.
 - b. wearing required personal protective equipment.
 - c. using appropriate measures relating to chemical, physical and biological substances and agents; and
 - d. following applicable emergency operating procedures.
4. report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and serious danger to his/her life or health.
5. treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers or children.
6. not engage in any form of sexual harassment including unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature with other Service Provider's or Employer's Personnel;
7. not engage in Sexual Exploitation, which means any actual or attempted abuse of 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;
8. not engage in in Sexual Abuse, which means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions;
9. not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage;
10. complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including on health and safety matters, and Sexual Exploitation and Abuse, and Sexual Harassment (SH);
11. report violations of this Code of Conduct; and
12. not retaliate against any person who reports violations of this Code of Conduct, whether to us or the Employer, or who makes use of applicable grievance mechanism for Service Provider's Personnel or the project's Grievance Redress Mechanism.

RAISING CONCERNS

If any person observes behaviour that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she should raise the issue promptly. This can be done in either of the following ways:

1. Contact [*enter name of the individual, with relevant experience, designated by the Service provider to handle these matters*] in writing at this address [] or by telephone at [] or in person at []; or
2. Call [] to reach the Service Provider's hotline (*if any*) and leave a message.

The person's identity will be kept confidential, unless reporting of allegations is mandated by the country law. Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. We take seriously all reports of possible misconduct and will investigate and take appropriate action. We will provide warm referrals to service providers that may help support the person who experienced the alleged incident, as appropriate.

There will be no retaliation against any person who raises a concern in good faith about any behaviour prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

CONSEQUENCES OF VIOLATING THE CODE OF CONDUCT

Any violation of this Code of Conduct by the Service Provider's Personnel may result in serious consequences, up to and including termination and possible referral to legal authorities.

FOR SERVICE PROVIDER'S PERSONNEL:

I have received a copy of this Code of Conduct written in a language that I comprehend. I understand that if I have any questions about this Code of Conduct, I can contact [*enter name of Service Provider's contact person(s) with relevant experience*] requesting an explanation.

Name of Service Provider's Personnel: [*insert name*]

Signature: _____

Date: (day month year): _____

Countersignature of authorized representative of the Service Provider:

Signature: _____

Date: (day month year): _____

Attachment

THE CODE OF CONDUCT FORM

BEHAVIORS CONSTITUTING SEXUAL EXPLOITATION AND ABUSE (SEA) AND BEHAVIORS CONSTITUTING SEXUAL HARASSMENT (SH)

The following non-exhaustive list is intended to illustrate types of prohibited behaviours.

(1) **Examples of sexual exploitation and abuse** include, but are not limited to:

- A Service Provider's Personnel tells a member of the community that he/she can get them jobs related to the work site (e.g., cooking and cleaning) in exchange for sex.
- A Service Provider's Personnel that is connecting electricity input to households says that he can connect women headed households to the grid in exchange for sex.
- A Service Provider's Personnel rapes, or otherwise sexually assaults a member of the community.
- A Service Provider's Personnel denies a person access to the locations where the Services are executed unless he/she performs a sexual favour.
- A Service Provider's Personnel tells a person applying for employment under the Contract that he/she will only hire him/her if he/she has sex with him/her.

(2) **Examples of sexual harassment in a work context**

- A Service Provider's Personnel comment on the appearance of another Service Provider's Personnel (either positive or negative) and sexual desirability.
- When a Service Provider's Personnel complains about comments made by another Service Provider's Personnel on his/her appearance, the other Service Provider's Personnel comment that he/she is "asking for it" because of how he/she dresses.
- Unwelcome touching of a Service Provider's Personnel or Employer's Personnel by another Service Provider's Personnel.
- A Service Provider's Personnel tells another Service Provider's Personnel that he/she will get him/her a salary raise, or promotion if he/she sends him/her naked photographs of himself/herself.

Annex 5 : Service Providers/ Contractors Declaration for Subcontractors on GBV Sexual Exploitation and Abuse (SEA) and/or Sexual Harassment (SH) Performance Declaration for Subcontractors*

[The following table shall be filled in by each subcontractor proposed by the Supplier, which was not named in the Contract]

Subcontractor’s Name: *[insert full name]*

Date: *[insert day, month, year]*

Contract reference *[insert contract reference]*

Page *[insert page number]* of *[insert total number]* pages

SEA and/or SH Declaration
<p>We:</p> <p><input type="checkbox"/> (a) have not been subject to disqualification by the Bank for non-compliance with SEA/ SH obligations.</p> <p><input type="checkbox"/> (b) are subject to disqualification by the Bank for non-compliance with SEA/ SH obligations.</p> <p><input type="checkbox"/> (c) had been subject to disqualification by the Bank for non-compliance with SEA/ SH obligations and were removed from the disqualification list. An arbitral award on the disqualification case has been made in our favour.</p>
<p><i>[If (c) above is applicable, attach evidence of an arbitral award reversing the findings on the issues underlying the disqualification.]</i></p>
<p>Period of disqualification: From: _____ To: _____</p>

Name of the Subcontractor _____

Name of the person duly authorized to sign on behalf of the Subcontractor _____

Title of the person signing on behalf of the Subcontractor _____

Signature of the person named above _____

Date signed _____ day of _____, _____

Countersignature of authorized representative of the Supplier:

Signature: _____

Date signed _____ day of _____, _____

Annex 6: Gender Based Violence Monitoring Checklist



GBV (SEA-SH) Monitoring Checklist

Region:.....

District:.....

Community/Location of Subproject :.....

Date:.....

Name/ type of Subproject:.....

No	COMPLIANCE ISSUES	YES	NO	SCORE Yes=1 No=0	CORRECTIVE FOLLOW-UP ACTIONS RECOMMENDED
GBV (SEA-SH) CHECKLIST					
1	Community sensitized on the gender provisions of the project e.g., what constitutes GBV (SEA-SH), GM platforms/ channels for reporting GBV Code of Conduct				
2	Sensitization program considers the special needs of women, vulnerable				
3	GBV Code of Conduct signed by staff				
4	PWDs can access the venue				
5	Interpreter engaged for the hearing impaired				

No	COMPLIANCE ISSUES	YES	NO	SCORE Yes=1 No=0	CORRECTIVE FOLLOW-UP ACTIONS RECOMMENDED
6	Toilet facility available at site				
7	Toilet facility at the site separated by gender				
8	Females from qualified households are given equal opportunity to enrol as the males				
9	Females have equal access to their cash grants as males				
10	Females from beneficiary households have equal access to other SPIs s men				
11	Project IEC materials displayed on the site				
12	Community Facilitators are Knowledgeable on GBV issues				
13	Are beneficiaries aware of GBV issues				
14	Female beneficiaries are participating in reassessment process as men				
15	Children have been hired for site activity				

