

FEDERAL GOVERNMENT OF SOMALIA



**MINISTRY OF LABOR & SOCIAL AFFAIRS
(MOLSA)**

**SEXUAL EXPLOITATION AND ABUSE/SEXUAL
HARASSMENT PREVENTION AND RESPONSE ACTION
PLAN**

**SOMALIA SHOCK-RESPONSIVE SAFETY NET FOR
HUMAN CAPITAL PROJECT – (P181469)**

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ABBREVIATIONS & ACRONYMS

CoC	Code of Conduct
CRW	Crisis Response Window
FGM	Female Genital Mutilation
FGS	Federal Government of Somalia
GBV	Gender Based Violence
GRC	Grievance Redress Committee
GM	Grievance Mechanism
GPN	Good Practice Note
IEC	Information Education and Community
IASC	inter-agency standing committee
IP	Implementing Parties
OHS	Occupational, Health and Safety
PIUs	Project Implementation Units
PSEA	Principles of Sexual Exploitation and Abuse
MoWHRD	Ministry of Women and Human Rights Development
SGBV	Sexual and Gender Based Violence
SEA	Sexual Exploitation and Assault
SPD	Standard Procurement Documents
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SOB	Sexual Offences Bill
SOPs	Series of Projects
SPD	Standard Procurement Documents
STIs	Sexually Transmitted Infections
SNHCP	Shock Responsive Safety Net for Human Capital Project
VAC	Violence against Children
WB	World Bank

1 INTRODUCTION

1.1 Project Information

The Baxnaano program was launched in late 2019 and is administered by the Ministry of Labor and Social Affairs (MoLSA) on behalf of the Federal Government of Somalia (FGS). Baxnaano provides support to poor and vulnerable beneficiaries through two windows: (i) Regular window – An unconditional cash transfer program which covers 200,000 chronically poor and vulnerable households (approximately 1.3 million individuals) with focus on households with children aged under five years, currently active in 25 districts across all Federal Member States (FMS) and Somaliland and (ii) Shock response window. The window is expected to support a total of 598,000 households (3.59 million individuals) with temporary emergency cash transfers, 338,000 drought affected households supported under Shock Responsive Safety Net for Human Capital Project (SNHCP) and 260,000 locust affected households supported under Shock Responsive Safety Net for Locust Response Project

A first Additional Financing (AF) approved on June 17, 2021, increased the duration of Baxnaano support for the same beneficiary cohort to ensure that efforts at improving human capital could be maintained. A second AF approved on June 22, 2022, supported a response to the urgent food security needs of poor and vulnerable populations affected by the prevailing drought crisis which began in late 2021. The Project comprises three components which finance (i) nutrition-linked unconditional cash transfers, (ii) delivery systems and institutional capacity building, and (iii) project management, monitoring and evaluation (M&E), and knowledge management. In this Af, component 4 will establish new pilot on Service Delivery Mechanism (SDM) and health and nutrition co-responsibility cash transfer (H&N Cct). This will intervention will be related to (i) Provision of income support to poor and vulnerable pregnant women and lactating mothers and young children contribution to their improved nutrition, (ii) Incentivize uptake of key health and nutrition services, (iii) to improve awareness on maternal and early child health and nutrition and promote behavioral change.

The Federal Government of Somalia (FGS) has requested third additional financing that will serve two key purposes to respond to urgent crisis needs. First, the AF draws upon US\$ 60 million in Crisis Response Window (CRW) “last resort financing” to provide emergency cash transfers to 145,000 drought affected poor and vulnerable households. SNHCP aims to provide support to a total of 338,000 drought affected households of which existing financing support was available for 193,000 households which have already received or are in process of receiving ECTs. This AF will provide support to the remaining 145,000 drought affected households and enable the project to achieve its target. Second, a restructuring will invest in key building blocks for resilience to future crises: expanding the Unified Social Registry (USR) nationwide and investing in health and nutrition as well as economic inclusion interventions in urban areas

1.2 SEAH action plan Purpose and Objective.

The objectives of the SEAH action plan are summarized below

- (i) To provide tools and frameworks that will support the SNHCP Project Implementing Committee (PIU) in preventing and responding to the Project-induced SEAH and GBV risks.
- (ii) To develop protocols that will be adopted to resolve any SEAH allegations that may arise during implementation of the SNHCP project.
- (iii) To provide procedures for preventing and responding to SEAH, how complaints of SEAH will be handled, and disciplinary action for violation of the Code of Conduct (CoC) by project workers.

1.3 Approach and Methodology

The plan was prepared using the methodology below.

- (i) Literature review of World Bank guidelines, global and national laws and policies on GBV/SEAH.
- (ii) Identification of potential project-induced GBV/SEAH risks related to SNHCP interventions.
- (iii) Development of possible mitigation measures which included an assessment and plan for strengthening capacity of project workers to be engaged under the SNHCP project.
- (iv) Identification of key actions to be taken, such as institutions responsible and time frames for the implementation of each of the identified actions.

2 LEGAL FRAMEWORK AND GAP RELATED TO SEAH AND GBV

2.1 Somalia Context

The Somali legal system is a mixture of systems, which comprises of statutory law, customary law (Xeer) and Sharia law. Although Sharia law is not applied in statutory courts, it is integrated into customary law where it is also not adhered to strictly. While formal laws define crimes and punishment, their application is continuously negotiated through the customary power dynamics and their upholders. In practice, the primacy of Xeer is accepted and is the most accessible, used and preferred system for dispute resolution. The state also perpetuates the Xeer supremacy when its officers – police, prosecutors and judges – refer cases back to clan elders, who still remain the most powerful force behind justice and access to it.

The same is witnessed in Somaliland, where “Xeer remains the main source of law, especially in remote and rural areas where government presence is scarce.”¹ The Xeer is made by clan leaders or elders, selected for their assumed wisdom, courage, experience and knowledge to arbitrate disputes and deliver verdicts. **Table 2-1** below presents context of legal context on SEAH/GBV related issues.

Table 2-1: Somalia Legal Context

Principle	Details
The Provisional Constitution of Somalia (2012)	<p>The constitution stipulate general principles of human rights accorded to all Somali citizens. Under these Titles, there are 31 Articles that specify the fundamental rights accorded to all Somali citizens and those set out for permissible limitation on rights provided.</p> <p>Relevant articles are:</p> <p>Article 10: protects human dignity. Article 11: protects equality of all citizens regardless of sex, religion, social or economic status, political opinion, clan, disability, occupation, birth or dialect. Article 15: protects liberty and security of the person, including freedom from all violence against women including Female Genital Mutilation (FGM), which is explicitly prohibited. Article 27: protects social and economic rights. Articles 34 and 39: guarantees access to courts and redress for violations of human rights.</p>
The 1962 Penal Code	<p>The 1962 Penal Code is still current law in the legislation that addresses GBV. It criminalizes rape (Article 298) and other forms of sexual violence, such as sexual exploitation and abuse and sexual harassment as well as forced prostitution (Article 408). Articles 398–9 provide that ‘carnal intercourse’ and ‘acts of lust committed with violence’ are punishable with 5–15 years’ and 1–5 years’ imprisonment respectively. However, the crimes are too narrowly defined in accordance with international law standards of protection from GBV.</p>

¹ Policy Paper by the Strategic Initiative for Women in the Horn of Africa (SIHA Network). A reflection on Gender equality. Agenda in Somaliland November 2020

	Furthermore, the legislation contains no age of consent. This omission leaves children particularly vulnerable to abuse.
Rape, fornication and other related offences bill- law no. 78/2020- Somaliland	The House of Representatives in September 2020 passed the Rape, Fornication and other Related Offences Bill- Law No. 78/2020. Article 11 of the Act address Sexual Harassment and Assault, it provides that “ <i>Any mature and mentally sane individual who inappropriately touches a person other than their spouse, or compels a person to touch him/her inappropriately, or forces a person to touch another person inappropriately, has committed a criminal act of unwelcome sexual advances and inappropriate touching and is liable to a penalty of 1-3 years of imprisonment. If the criminal act stated in Paragraph 1 of this Article, is committed against a minor, or a vulnerable person, the offender will be liable to 3-5 years of imprisonment</i> ”. The law does not provide any details on legal age of a minor in Somalia or sex consent. However, according to the Family Code (1975), the legal age for marriage in Somalia is 18 for both men and women

2.2 International Legal Instruments

The international human rights instruments that define GBV and that Somalia has signed and ratified include: the recently ratified Convention on the Rights of the Child (CRC) in January 2015; the International Convention on the Elimination of All Forms of Racial Discrimination in 1975; and the African [Banjul] Charter of Human Rights in 1985 and 1986. Somalia is yet to sign or ratify many of the international instruments that are derived from the universal human rights that define GBV, including Convention for Elimination of Discrimination against Women CEDAW and the Protocol to the African Charter on Human Rights and Peoples’ Rights on the Rights of Women in Africa.

2.3 The WB Good Practice Note

The WB Good Practice Note² (GPN) provides a comprehensive understanding of the nature and kinds of GBV that project funded by the Bank may exacerbate. The GPN establishes an approach to identifying risks of GBV, particularly sexual exploitation and abuse and sexual harassment that can emerge in major infrastructure projects with civil works contracts. The GPN builds on World Bank experience and good international industry practices, including those of other development partners.

The GPN which provides tailored information and tools to understand GBV risks and considerations in infrastructure projects; addressing GBV risks and capacities to respond using the Bank’s GBV Risk Assessment Tool; addressing GBV risks in design and implementation phases including during bid processes, codes of conduct with contractors and laborers; safeguards to collect and respond to GBV and SEA including Grievance Mechanisms, consultations and responding to GBV incidents, and suggestions for improving safety of, and consultations with,

² Good Practice Note: Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works, 28 September 2018, the World Bank group.

women and girls throughout the project. Key Principles of GPN are summarized in **Table 2-2** below.

Table 2-2: Key Principles of World Bank Good Practice Note (GPN)

Principle	Details
Reduce labor influx by tapping into the local workforce.	Depending on the size and the skill level of the local workforce, a share of the workers required for the project may be recruited locally. This is generally easier for unskilled workers, while more specialized staff (typically required in smaller numbers) frequently will be hired from elsewhere. Depending on the requirements of the project and their skill level, it may be possible to train local workers within a reasonable timeframe to meet project requirements. This may be more likely if such trained staff are needed afterwards for the operation and maintenance of the new infrastructure.
Assess and manage labor influx risk based on appropriate instruments.	This may range from broad requirements set out in the ESMP in a low-risk environment, to the need to develop more specialized instruments, such as a site-specific Labor Influx Management Plan and/or a Workers’ Camp Management Plan (or other instruments with similar purpose)
Incorporate social and environmental mitigation measures into the civil works contract.	Most adverse impacts from labor influx can only be mitigated by the contractor commissioned by the Borrower to carry out the works. It is therefore paramount that the responsibilities for managing these adverse impacts are clearly reflected as a contractual obligation, with appropriate mechanisms for addressing non-compliance.

3 SEAH PREVENTION AND RESPONSE ACTION PLAN

3.1 Contextual GBV Risks

GBV is widespread in Somalia, and considered to be a major obstacle to equality, peace and development in the country. Despite the lack of comprehensive and reliable national population based GBV prevalence data, information that does exist indicates that GBV is common in the lives of women and girls across the life course in Somalia, with some forms of GBV endemic. Female Genital Mutilation (FGM) has in the past been near universally practiced. Intimate partner violence and sexual violence, the most prevalent types of GBV globally, are both commonplace in the lives of Somali women and girls, although there is limited data on which to estimate reliable prevalence and trends in perpetration and victimization rates over time.

Some forms of GBV are normative in Somalia, including FGM, child marriage and some intimate partner violence behaviors, in particular a man's use of physical violence to discipline or control his wife under certain circumstances.³ Other normative forms of GBV in Somalia include cultural practices of abduction and forced marriage and widow inheritance.⁴ The extent to which each type of GBV is practiced and normative varies across regions of the country, and there are indications of apparent shifts in beliefs and attitudes that support FGM, child marriage and intimate partner violence within Somalia, as discussed in more detailed in the next section. However, in the absence of reliable quantitative and qualitative research, it is hard to assess the degree of attitudinal change.

According to Relief Web International⁵ The already large number of recorded incidences of Gender-Based Violence (GBV) in 2021 continued to increase in 2022, especially for sexual violence and Intimate Partner Violence (IPV), due to multiple displacements, flooding, droughts and armed conflicts. An estimated 4.3 million people have been affected by natural disasters and armed conflict, while some 554,000 have abandoned their homes in search of water, food, and pasture in December 2021. The number of people requiring humanitarian assistance in 2022 has been estimated to 7.7million. The delayed electoral process and tensions related to power struggles among political actors reinforced insecurity and limited mobility for people to seek livelihoods. As the drought and food insecurity persist in Somalia, women, and girls experience alarming levels of poverty and economic depravity: a precursor for increased vulnerability to GBV.

3.2 Potential Project-related SEAH Risks

³ International Alert/CISP (2015) The Complexity of Sexual and Gender-Based Violence: Insights from Mogadishu and South Central Somalia, International Alert, Nairobi.

⁴ Norwegian Country of Origin Information Centre (2018) Somalia: Marriage and divorce, Land info, Oslo.

⁵ <https://reliefweb.int/report/somalia/overview-gender-based-violence-situation-somalia-advocacy-brief-2022>

There is the possibility of increased risk of gender-based violence and abuse of women and children in situations of poverty, hunger, conflict, insecurity and displacement. Women's lack of access to and control of assets, services and income increases their economic dependence as well as their vulnerabilities to abusive and exploitative situations. Food or cash assistance may also unintentionally contribute to GBV. Special safeguards need to be put in place to ensure that these risks are averted and or mitigated and redressal mechanisms put in place.

For SNHCP potential GBV cases will be triggered through

- Cases of Sexual exploitation through the exchange of sexual favours for registration or transfer of funds,
- The spousal abuse to receive cash are the key points of GBV/SEA risks for the project.
- Risks related to improper social registry data security, collection and storage that favors female who fall for sexual favors etc.
- Risk related to female recipient of the mobile payment who not have control over the phone asset used for delivery - this can increase exposure to male relatives or even senior women in the household and or even the exposure to SEA from vendors and staff etc.

3.3 GBV Risk Management Systems and Gaps in FGS

Statutory laws introduced during the colonial era and after independence were disdained and seen to be incompatible with the nature and norms of Somali society. There was an overwhelming and paramount preference for customary law over statutory law by politicians, who mainly happen to be the clan elders or men from major clans. Politicians had no interest in modifying customary law after independence, as they themselves benefited from the protection and power provided by it and the continued social exclusion of minority and vulnerable groups.

The Provisional Constitution of Somalia (2012) stipulate General Principles of Human Rights accorded to all Somali citizens. Under these Titles, there are 31 Articles that specify the fundamental rights accorded to all Somali citizens and those set out for permissible limitation on rights provided. Some of the relevant articles are:

Article 10: protects human dignity.

Article 11: protects equality of all citizens regardless of sex, religion, social or economic status, political opinion, clan, disability, occupation, birth or dialect.

Article 15: protects liberty and security of the person, including freedom from all violence against women including Female Genital Mutilation (FGM), which is explicitly prohibited.

Article 27: protects social and economic rights.

Articles 34 and 39: guarantees access to courts and redress for violations of human rights.

The 1962 Penal Code is still current law in the legislation that addresses GBV. It criminalizes rape (Article 298) and other forms of sexual violence, such as sexual exploitation and abuse and sexual harassment as well as forced prostitution (Article 408). Articles 398–9 provide that ‘carnal intercourse’ and ‘acts of lust committed with violence’ are punishable with 5–15 years’ and 1–5 years’ imprisonment respectively. However, the crimes are too narrowly defined in accordance with international law standards of protection from GBV. Furthermore, the legislation contains no age of consent. This omission leaves children particularly vulnerable to abuse.

Sexual offences continue to primarily be adjudicated through customary legal systems, the most accessible and preferred justice system in Somalia including Somaliland, in which sexual crimes are not perceived as a violation against an individual, but as a crime against the family or clan and as an issue of morality and honor.⁶ Preference for customary law is due to both the limitations of the statutory system, i.e. the lack of protections from intimate partner violence under the law, and because of the compensation and redress afforded by customary processes. There is a need for greater engagement with each of the different legal systems in operation to gain an improved understanding of changes required to strengthen gender-sensitive justice for GBV survivors and their families and address impunity

Key bills have been drafted to criminalize sexual offences and FGM/C, although as yet they have not been legislated across all regions. The Sexual Offences Bill, which criminalizes a wide range of sexual offences, has been legislated in Puntland and Somaliland, and successfully used in the former, but is yet to be legislated by the Federal Government of Somalia.⁷ There remains gaps in both legislative protections and in enforcement of law and administration of justice in relation to sexual violence, and survivors and their families seriously undermine the protection of women and girls from GBV which continue to face significant barriers in accessing the formal justice system in Somalia. While statutory legal protections against GBV in Somalia have been strengthened in recent years, statutory judicial structures overlap with the customary system⁸ and remain governed by traditional cultural systems that seek to preserve social stability between communities and families over an individual’s rights.

In Somaliland, statutory law has largely left matters within the field of family law to be resolved through Shari’a law.⁹ In 2018, the Somaliland government took significant steps by drafting and announcing the possibility of adopting the Sexual Offences Bill (SOB). However, to date there has been no progress toward actually integrating the bill into the Somaliland criminal code. Rather the Sexual Offences Bill has undergone significant changes to become more conservative and discriminatory toward women likely due to the heavy pressure exerted by the House of Elders, which seems to have peaked in April 2019, a new bill was drafted to replace the SOB of 2018. An

⁶ International Alert/CISP (2015)

⁷ Ritchie and Koshin (2019)

⁸ International Alert/CISP (2015)

⁹ A Policy Paper by the Strategic Initiative for Women in the Horn of Africa (SIHA Network) November 2020

unofficial copy of the text of this newly titled ‘Rape, Fornication and Other Related Offences’ Bill, was released in September 2019.

3.4 Key Mitigation Measures to Address GB/SEAH Risks

The project will adopt below discussed approach to address potential GBV/SEAH risks are as follows;

- **Strengthen co-ordination and collaboration of institutions** at national and sub-national levels on the GBV response by involving the relevant Government units such as the Ministry of Women and Human Rights Development (MoWHRD) in the strengthening of the GBV package of services and referral system in project areas. To this end, the project will strengthen the reporting mechanism and procedures of local systems to ensure a survivor centred referral and response. Further the project will **hire a GBV/SEA specialist in the PIU, WFP and UNICEF** to supervise and provide technical support for the implementation of GBV/SEA Action Plan.
- **Review and update of GBV service providers¹⁰**: The project will review and update GBV service providers in each location for timely referral of GBV survivors to provide relevant services based on survivors' needs will be identified. The PIU, WFP and UNICEF staff will all be informed of the actors working in different project locations. The list of service providers will be mapped out before the commencement of any construction activities and will inform on key gaps where remedial measures may be required. Further, the project will leverage on existing GBV/SEAH risk management systems of the WFP¹¹.
- **Continued use of WFP Corporate Policies on SEA**: WFP has a zero-tolerance policy on SEA which focuses on acts committed against the people it serves, by WFP employees or others associated with its work. WFP adopted the Secretary-General’s Bulletin on “Special Measures for Protection from Sexual Exploitation and Sexual Abuse” (ST/SGC/2003/13) in 2004 and has continued to reaffirm its commitment to protection from SEA with four Executive Director Circulars issued since then, the latest in 2014. Any acts of SEA constitute serious misconduct and is grounds for disciplinary measures, including summary dismissal and referral to enforcement authorities for criminal prosecution, where appropriate. WFP’s policy on SEA covers acts which occur at or away from the workplace, during or outside working hours, including sexual activity with children (under the age of 18), exchange of money, employment, goods, assistance or services for sex, including sexual activity with prostitutes

¹⁰ [Somalia Referral Pathway](#)

¹¹ WFP has multiple channels to mitigate against any risk arising out of the project that may exacerbate any underlying GBV incidences or contribute towards it. The measures will include **WFP Corporate policy on SEA** defining protocol for recognizing, inhibiting and dealing with SEA; **WFP referral protocol** will enable beneficiaries to access the professional support services; **Complaints and Feedback mechanism** will help receive any complaints and direct the victim to seek specialized services; **Training and capacity building** gaps will be identified among all key stakeholders and trainings undertaken ; **Protection protocol** will be followed in all stages of the project cycle. For further detail refer to Annex 2 of this document on **GBV Action Plan**.

- **Communication to project affected communities about GBV/SEAH risks and mechanisms:** Community awareness on GBV/SEAH, education and raising of awareness for women, adolescents and children of SEA and their legal rights will be provided. Project beneficiaries should be made aware of the laws and services that can protect them and provide redress in case of an incident. CoCs will be made available to the public in the project areas, especially to identified project stakeholders, to raise awareness of expected behavior of any project-related worker and mechanisms for reporting should those workers be in breach of the CoC. To provide a full account of how GBV grievances will be handled, specific GRM protocol for SEAH/GBV Related Grievances is provided as Appendix 5.6, Appendix 5.3 provides Sample CoC for Project Workers and Appendix 5.7 provides available referral pathways presented as separate zipped folder
- **Adoption of the Core Principles of the Inter Agency Standing Committee (IASC) Task Force and World Bank Action Plan on Principles of Sexual Exploitations and Abuse (PSEA)¹².** All categories of workers will be inducted and will sign a Code of Conduct (CoC)¹³, which includes expected standards of behavior regarding GBV/SEA according to the World Bank's 2017 Standard Procurement Documents (SPDs)¹⁴. IPs will further ensure that all contractors, suppliers, NGOs and other implementing partners' workers have been inducted and have signed a CoC.
- **Sensitization and training all project staff** on expectations around SEAH. PIU, WFP and UNICEF will ensure that their direct workers, partners, sub-contractors, suppliers and those appointed as SEA focal points are trained in CoCs and GBV/SEA and child protection risk issues as part of their induction as well as throughout course of employment on quarterly basis. All categories of workers will be inducted and will sign a Code of Conduct (CoC), which includes expected standards of behaviours regarding GBV/SEA according to the World Bank's 2017 Standard Procurement Documents (SPDs)¹⁵. IPs will further ensure that all contractors, suppliers, NGOs and other implementing partners' workers have been inducted and have signed a CoC PSEA¹⁶. PIU and IPs will roll out direct training activities for all contracted as well as community workers deployed for their activities – prior to the start of such.
- **Conduct GBV risks assessments at project sites.** GBV risk assessments will be conducted by MoLSA PIU in liaison with WFP and UNICEF using the safety audits methodology before commencement of the 3rd AF. The scope of the audit will form part of GBV risk assessment presented under **Annex 5.5**, the assessment will include;

¹² IASC (2002), Six Core Principles for Relating to Sexual Exploitation and Abuse, accessed at: <https://interagencystandingcommittee.org/principals/documents-public/iasc-six-core-principles-relating-sexual-exploitation-and-abuse-2002>

¹³ Samples presented in appendices 5.2 and 5.3

¹⁴ The World Bank has not “endorsed” a template CoC for projects. The SPDs provide guidance on the minimum content of issues to be addressed in the CoC.

¹⁵ The World Bank has not “endorsed” a template CoC for projects. The SPDs provide guidance on the minimum content of issues to be addressed in the CoC.

¹⁶ IASC (2002), Six Core Principles for Relating to Sexual Exploitation and Abuse, accessed at: <https://interagencystandingcommittee.org/principals/documents-public/iasc-six-core-principles-relating-sexual-exploitation-and-abuse-2002>

- ✓ Conducting requisite Sexual and Gender Based Violence (SGBV) trainings to the target Units / Groups
 - ✓ Reviewing the adequacy of existing Contractor's SGBV policies
 - ✓ Developing SGBV Framework including Reporting and Investigation procedures
 - ✓ Implementing the measures outlined in the SGBV action plan
- **Establishment of a Reporting Protocol including accountability and response framework.**
A strong SEAH reporting Protocol will ensure timely and safe reporting of SEAH incidences. Beneficiaries and communities should be informed of the availability of varying channels of reporting for allegations related to GBV/SEA. This will be made explicit in all community awareness sessions, as well as be part of the publicly disclosed information. Appointment of GBV/SEAH Focal points at community and project level. PIU and IPs will ensure that an Sexual Exploitation and Abuse (SEA) focal point is designated in all project areas in the field as well as at the country level. The SEA Focal points will be the designated person to handle GBV complaints. The PIU, WFP and UNICEF GBV specialist will identify specific responsibilities and train on SEA Focal Points GBV/SEAH mechanisms.

SEA Focal points will focus on below listed,

- Communities, including children, are aware of the risks of GBV, their rights and the mechanisms available to them to report GBV cases;
- Referral pathways in place and functional;
- Appropriate GBV services and referral pathways are provided to survivors and accountability processes are followed;

GBV minimum indicators will include:

- Successful implementation of agreed GBV Prevention and Response Action Plan;
- Number of training courses related to GBV delivered;
- Percentage of workers that have signed a CoC; and/or,
- Percentage of workers that have attended the CoC training.
- Percentage (%) Of GBV/SEAH cases closed within the delays defined in the project GBV Action Plan (disaggregated by outcome of the verification process)
- Percentage (%) Of survivors reporting project-related incidents who were referred to case management services (disaggregated by type of service)

4 GBV/SEAH MATRIX

	Objective:	TO INCREASE AWARENESS AND ENHANCE RESPONSE SYSTEMS FOR GBV, SEA AND SH INCIDENTS					
	Activity to Address SEAH risk	Steps to be taken	Timelines	Responsible	Monitoring (Who will monitor)	Output indicators	Budget (USD)
1	INCORPORATE GBV/SEAH REQUIREMENTS AND EXPECTATIONS IN THE CONTRACTOR AND CONSULTANTS' CONTRACTS. Define and reinforce GBV/SEA/SH requirements in procurement processes and contracts						
	Incorporate GBV/SEAH Requirements and expectations in the contractor and consultants' contracts.	Ensure that GBV/SEAH issues are incorporated in all contracts signed by contractors and consultants	Before project activities begin	MoLSA PIU- GBV Specialist, Procurement Specialist	PIU	GBV/SEA/SH standards in procurement/contract document	<i>N/A (activity to be done by the Procurement /GBV Specialists)</i>
	Allocation of funds for GBV/SEAH related costs in procurement documents.	Clearly define SEAH requirements and expectations in the bidding documents Evaluate the contractor's SEAH Accountability and Response Framework in the C-ESMP and confirm prior to finalizing the contract the contractor's ability to meet the project's GBV/SEAH prevention and response requirements.	During preparation of bid and Contract documents Monitoring on a quarterly basis	MoLSA PIU- GBV Specialist	MoLSA / World Bank	Bid documents with clearly defined SEAH requirements Contract documents with clearly defined SEAH clauses/requirements	total budget presented as 100,000 USD per annum for items 2 to 11 below present a breakdown of this budget
2	RECRUIT GBV ADVISOR, CODES OF CONDUCT SIGNING AND GBV/SEAH ORIENTATION TRAININGS. Review the Implementing Agencies (IA's) capacity to prevent and respond to GBV/SEA						

	Codes of Conduct signed and understood.	Define the requirements to be included in the CoC which addresses GBV/SEAH Review CoC for provisions/clauses that guard against GBV/SEAH Have CoCs signed by all those with a physical presence at the project site. Train project-related staff on the behavior obligations under the CoCs.	During Project implementation	GBV Specialist/ Social /GBV safeguard Specialist	MoLSA / World Bank	Percentage of workers that have signed a CoC Percentage of workers that have attended CoC training.	Cost of training of the CoC. Included in the SEAH orientation training and for contractors it will be included in the C-ESMP
	Conduct GBV/SEAH orientation training for all workers. (Project workers), contractors and consultants	Develop a training plan Develop training materials Conduct training on GBV/SEA risks, responsibilities, and legal/policy requirements Conduct training for project staffs Develop reporting and accountability protocol for managing reported cases	Quarter 1 and 2 after contract signing Retraining during Project implementation.	MoLSA PIU, WFP and UNICEF GBV Specialist/ /GBV safeguard Specialist	MoLSA PIU, WFP and UNICEF GBV Specialist / World Bank	Number of trainings conducted	20,000
3	STRENGTHEN INSTITUTIONAL CAPACITY FOR GBV/SEAH RISK MITIGATION AND RESPONSE;						
	Strengthen co-ordination and collaboration at national and sub-national levels on the GBV response	Involving the relevant Government units such as the MoWHRD in the strengthening of the GBV package of services and referral system in project areas.	Quarter 1	MoLSA PIU, WFP and UNICEF	MoWHRD,	Government GBV coordination unit created	To be done by GBV specialist to be hired under PIU
4	GBV/SEA SENSITIVE CHANNELS FOR REPORTING IN GM						

	Develop/Review GM for specific GBV/SEAH procedures	Undertake internal review of GM for GBV/SEAH reporting channels Identify and Integrate GBV/SEAH entry points within the GM with clear procedures and tools for management of related complaints	Quarter 1	MoLSA PIU, WFP and UNICEF	MoLSA / World Bank	GBV/SEAH procedures integrated in the GM Variety of reporting channels for GBV/SEAH identified	N/A to be done by GBV specialist to be hired under
	Develop an information sharing protocol	The protocol will lay down the principles for data collection, management and storage. It will identify what kind of data should be collected by whom and for what. It will define how data should be recorded and stored and procedures for alerting the WB	Quarter 1	MoLSA PIU, WFP and UNICEF	MoLSA / World Bank	GBV/SEAH procedures integrated in the GM Variety of reporting channels for GBV/SEAH identified	N/A to be done by GBV specialist to be hired under
	Train GM Operators on key protocols: referral, reporting and confidentiality	Develop training materials on GBV/SEAH reporting for GM Operators, SEA/SH Focal Point at the IPs and Community Focal Points. Conduct training of GM operators on GBV/SEAH	Quarter 1	MoLSA PIU, WFP and UNICEF	MoLSA / World Bank	GM Operators trained on GBV/SEAH protocols	Reported under (2) above
5	ESTABLISHMENT OF A GBV/SEA REPORTING PROTOCOL AND REFERRAL PATHWAY						

	<p>Develop key protocols for GBV/SEAH reporting and management</p>	<p>Develop and update disclosure and reporting guidelines / protocol for GBV/SEAH with provisions for confidentiality, informed consent and survivor protection and assistance.</p> <p>Create reporting pathways that include support systems and accountability mechanisms including how to handle SEAH allegations properly</p> <p>Develop simple, anonymous and confidential tracking system that PSEA focal points can use to document GBV incidents to service providers.</p> <p>Review logs for GBV/SEAH documentation to ensure it follows standards for documenting GBV/SEAH cases</p>	<p>Quarter 1 and review periodically</p>	<p>MoLSA PIU, WFP and UNICEF</p>	<p>MoLSA / World Bank</p>	<p>Percentage (%) Of survivors reporting project-related incidents who were referred to case management services (disaggregated by type of service)</p>	<p>A to be done by GBV specialist to be hired under</p>
6	COMMUNICATION TO PROJECT AFFECTED COMMUNITIES ABOUT GBV/SEAH RISKS AND MECHANISMS						

	Community awareness on GBV/SEA and disclosure of CoC	Create IEC materials on GBV/SEA Identification of child friendly and women safety areas for disclosure of information IEC available to communities in the local language	Quarter 1 And during project implementation	MoLSA PIU, WFP and UNICEF	MoLSA / World Bank	IEC materials created and disseminated with a gender perspective CoC available and translated	10,000
	Communicate GBV/SEA risks and options for reporting at the community level to create GBV awareness and enable project affected people to file complaints	Community awareness campaign on GBV/SEA and GM reporting mechanism	Quarter 1	MoLSA PIU, WFP and UNICEF	MoLSA / World Bank	Community awareness campaign developed in all project sites	To be expensed from similar communication item above
5	SENSITIZATION AND CAPACITY BUILDING OF PIU, GM, WORKERS, SERVICE PROVIDERS AND PARTNERS ON SEAH IN THE PROJECT						
	Codes of Conduct signed and understood. samples presented in appendices 5.2 and 5.3	Review CoC for provisions/clauses that guard against GBV/SEAH Save CoCs signed by all personnel Train all project-related staff on the behavior obligations under the CoCs.	In Quarter 1	MoLSA PIU, WFP and UNICEF	MoLSA / World Bank	Number of workers that have signed a CoC	A to be done by GBV specialist to be hired under

	Conduct trainings for all direct workers, partners, sub- contractors, supplier and SEA focal points trained on GBV/SEAH	Develop training session and materials Training should include explanation of GBV/SEAH, expectations for behavior and conduct, sanctions for violations, roles and responsibilities of actors involved, GBV incident report mechanism, and accountability and referral procedures.	In quarter 1	MoLSA PIU, WFP and UNICEF	MoLSA / World Bank	Number of workers who have attended GBV/SEAH training	expensed similar training budget above
7	CONDUCT GBV RISKS ASSESSMENTS AT PROJECT SITES						
	Assess GBV risks in project sites	Develop/adaptation of safety audit tools Conduct periodic safety audits Include safety audit recommendations in project sub-components	Before commencement of the project Reviewed and updated Every quarter	MoLSA PIU, WFP and UNICEF	MoLSA / World Bank	Safety audit reports developed in all project sites Safety audit recommendations in project sub components	10,000
8	STRENGTHENING GBV SERVICES PROVIDERS						
	Assessment of capacity of GBV service providers in project sites	Classification of existing Service Providers according to their technical capacity on GBV (according to global standards) to update existing referral pathways.	1 Quarter	MoLSA PIU, WFP and UNICEF	MoLSA / World Bank	Report with classification of GBV providers Number of GBV service providers contracted	expensed from item above
9	APPOINT PSEA FOCAL POINTS						

	Identify, train and establish project focal points for GBV/SEA	Development of ToRs for GBV/SEAH focal point Establish a trained, dedicated and committed network of project GBV focal persons	Quarter 1 Maintained throughout Project implementation.	MoLSA PIU, WFP and UNICEF	MoLSA / World Bank	Focal Point ToR developed No. of focal points and persons identified and trained	expensed similar training budget above
10	ESTABLISH A GBV/SEA ACCOUNTABILITY FRAMEWORK						
	Develop and accountability framework	Develop protocol with specific roles and responsibilities for parties on verification, investigation and management of cases within Government and IPs Develop specific sanctions as per type of GBV violation	1 Quarter	MoLSA PIU, WFP and UNICEF	MoLSA / World Bank	Accountability framework developed	A to be done by GBV specialist to be hired under?
11	ESTABLISH AN M&E SYSTEM OF THE GBV/SEAH PLAN						
	Develop a Supervision Plan of GBV plan	Hire a Third Party monitoring Agent/IVA to track implementation of GBV/SEAH risk management measures monitoring system to IPs, GBV/SEAH focal Points and PIU PIU should report on GBV/SEAH/SH in regular progress reports	1 Quarter Maintained throughout Project implementation.	GBV specialist, PIU	MoLSA PIU, WFP and UNICEF	MoLSA / World Bank	A to be done by GBV specialist to be hired under
Total							120,000USD PER ANNUM

5 APPENDICES

5.1 GBV/SEAH Reporting Format

GBV/SEAH Reporting Format

INCIDENT DETAILS	Remark	Guiding Notes
Type of Violation		SEAH (IP staff)
		GBV (by third party)
Nature of the incident reported		Basic facts of the incident. What was reported by the complainant (in his or her own words). Is the incident related to the project?
Source of information		Community Focal Point, GM Operator, email, other (specify)
Where did the incident occur		District
		Region
When did the incident occur		Date
Additional information (if available)		Sex, Age
<p>The identity and safety of a survivor must be protected at all times. No personal data or identifying information about a survivor or their experience can be shared through this document. Personal/identifying information includes the survivor's name, perpetrator(s) name, date of birth, home address, the exact time and place the incident took place, visible disability, residence status e.g. minority</p>		

5.2 Harassment & Violence at Workplace Policy

Mission

XXXXXXX Company is committed to providing a safe, healthy and supportive work environment by treating our employees and clients with respect, fairness and sensitivity.

Violence and harassment in the workplace can have devastating effects on employees' quality of life and organizational productivity.

Workplace violence is:

- the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker;
- an attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker; or,
- a statement or behavior that it is reasonable for a worker to interpret as a threat to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker.

Workplace harassment is engaging in a course of troublesome comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome; or workplace sexual harassment.

Workplace Sexual Harassment

- Engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity, or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome or
- Making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

Purpose of the Policy

XXXXXXX is committed to preventing workplace violence and harassment. This policy defines behavior that constitutes workplace violence and harassment, and explains procedures for reporting and resolving such incidents.

XXXXXXX is committed to providing a working environment free of violence and harassment by familiarizing all workplace parties with the related terminology as well as their individual responsibilities for prevention and corrective action.

Policy Statement

The management of **XXXXXXX** recognizes the potential for violence and harassment in the workplace. The Company will not tolerate any type of violence or harassment within the workplace or during work-related activities. The Company is committed to allotting whatever time, attention, authority and resources necessary to ensure a safe and healthy working environment for all employees and clients to whom we provide care.

XXXXXX will take every reasonable precaution to protect an employee from physical injury if we become aware, or believe, that domestic violence is a risk.

Definitions Associated with Workplace Violence and Harassment

Physical assault: is any physical force or threat of physical force to create fear and control another person. Some examples include: hitting, blocking, shoving, choking, slapping or biting, or pulling hair; "caring" for the victim in an abusive way, threats of violence, and using a weapon or other objects to threaten, hurt or kill.

Sexual assault: is any unwanted sexual act done by one person to another. Examples include: kissing or forcing/coercing the person into kissing; touching the person's body with or without clothes on; forcing/coercing the person to masturbate; sexual intercourse (anal or vaginal), penetrating with an object; causing bodily harm; removing or attempting to remove clothing; taking advantage of a position, trust or authority to get sex; and threatening to harm someone else if the person does not agree to do any of these things.

Threat (verbal or written): is a communicated intent to inflict physical or other harm on any person or to property by some unlawful act. A direct threat is a clear and explicit communication distinctly indicating that the potential offender intends to do harm, for example, "I am going to make you pay for what you did to me." A conditional threat involves a condition, for example, "If you don't leave me alone you will regret it." Veiled threats usually involve body language or behaviours that leave little doubt in the mind of the victim that the perpetrator intends to harm.

Verbal/Emotional/Psychological abuse: is a pattern of behaviour that makes someone feel worthless, flawed, unloved, or endangered. Like other forms of abuse, it is based on power and control. Examples include: swearing, put-downs/name calling over a period of time, labelling the victim in a derogatory way such stupid, crazy or irrational, acts of humiliation, extreme jealous behaviour, attacking the victim's self-esteem in other ways. It can also include harming pets and damaging property.

Workplace Bullying: repeated and persistent negative acts towards one or more individuals, which involve a perceived power imbalance and create a hostile work environment.

Roles and Responsibilities of Workplace Parties

Employer:

- ✓ Ensure that measures and procedures in the violence and harassment prevention program are carried out. Hold management accountable for responding to and resolving complaints of violence.
- ✓ Ensure compliance by all who have a relationship with the organization, such as physicians, contractors, volunteers, etc.
- ✓ Post a copy of this policy in the workplace.
- ✓ Integrate safe behaviour into day-to-day operations.
- ✓ Develop a reporting process for incidents of workplace violence and harassment.
- ✓ Investigate all reports or threats of violence/harassment in a prompt, objective and sensitive way.
- ✓ Report incidents of workplace violence to the DOSH Director as per the OSHA, 2007; if an employee is disabled from performing their own work or receives medical attention as a result of an incident.
- ✓ Take corrective action.

- ✓ Provide response measures.
- ✓ Facilitate medical attention and support for those involved directly or indirectly.

Managers/supervisors:

- ✓ Enforce policy and procedures and monitor worker compliance.
- ✓ Identify and alert staff to violent persons and hazardous situations.
- ✓ Investigate all workplace violence using the organization's accident investigation procedure and form, and contact the police as required.
- ✓ Facilitate medical attention for employee(s) as required.
- ✓ Debrief those involved in the incident either directly or indirectly.
- ✓ Contact human resources to ensure the employee receives further counselling about her/his legal rights.
- ✓ Track and analyze incidents for trending and prevention initiatives.
- ✓ Issue a report to the employer on all lost-time accidents where a worker requires healthcare, earns less than regular pay for regular work, requires modified work at less than regular pay or performs modified work at regular pay for more than seven days.
- ✓ Ensure the workplace violence and harassment prevention program is reviewed at least once a year.

Employees:

- ✓ Participate in education and training programs so you can respond suitably to any incident of workplace violence or harassment.
- ✓ Understand and comply with the violence and harassment prevention policies and related procedures.
- ✓ Report all incidents or injuries of violence/harassment or threats of violence/harassment to your supervisor immediately. Complete the Workplace Violence Incident Report.
- ✓ Contribute to risk assessments.
- ✓ Seek support when confronted with violence/harassment or threats of violence.
- ✓ Get medical attention.
- ✓ At least once a year, participate in a review of the workplace violence and harassment prevention program.

5.3 Individual Code of Conduct (CoC) for Project Workers

I..... acknowledge that adhering to environmental, social, health and safety (ESHS) standards, following the project’s occupational health and safety (OHS) requirements, and preventing gender-based violence (GBV) and violence against children (VAC) is important. All forms of GBV or VAC are unacceptable in the workplace or when interacting with communities.

The organization considers that failure to follow ESHS and OHS standards, or partake in GBV or VAC activities, constitutes acts of gross misconduct and is therefore grounds for sanctions, penalties or potential termination of employment. Prosecution of those who commit GBV or VAC may be pursued if appropriate.

I agree that while working on the project I will:

- Comply with applicable National and Company laws, policies, rules, and regulations (including policy on sexual harassment).
- Comply with applicable health and safety requirements to protect the Local Community (including vulnerable and disadvantaged groups), the Employer’s Personnel, and the Contractor’s Personnel (including wearing prescribed personal protective equipment, preventing avoidable accidents and a duty to report conditions or practices that pose a safety hazard or threaten the environment).
- Not discriminate in dealing with the local community and all co-workers. Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinions, national, ethnic or social origin, property, disability, birth or other status
- Not participate in sexual contact or activity with children (anyone age 18 or under)– including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
- Not indulge in Sexual Harassment (for example prohibition of the use of language or behavior, in particular towards women, children or men, that is inappropriate, abusive, sexually provocative, demeaning or culturally inappropriate).
- No Violence, including sexual and/or gender-based violence (for example acts that inflict physical, mental or sexual harm or suffering, threats of such acts, coercion, and deprivation of liberties).
- Not engage in any form of sexual exploitation or abuse including sexual exploitation and abuse (for example the prohibition of the exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliation, degrading behavior exploitative behavior, and abuse of power). This includes any project-related assistance due to community members. Sexual exploitation and sexual abuse constitute acts of serious misconduct and are therefore grounds for disciplinary measures, including summary dismissal;

- Refrain from Sex with anyone under the age of 18 and that the breach of this code will incur sanctions that could impact employment.
- Will not mix/ interact with children including sexual activity or abuse, or otherwise unacceptable behavior towards children (anyone under the age of 18) and ensure their safety in the project areas.
- Sanitation requirements (for example, to ensure workers use specified sanitary facilities provided by their employer).
- Avoid conflict of interest (such that benefits, contracts, or employment, or any sort of preferential treatment or favours, are not provided to any person with whom there is a financial, family, or personal connection).
- Respect reasonable work instructions (including environmental and social norms).
- Protection and proper use of property (for example, to prohibit theft, carelessness or waste).
- Attend and actively partake in training courses related to ESHS, OHS, GBV and the code of conduct as requested by my employer.
- Will report violations of this Code. All staff must report suspected or actual violations by a fellow worker, whether in the same contracting firm or not. Reports must be made through the GM setup for this purpose.
- Non- retaliate against workers who report violations of the Code, if that report is made in good faith.

Sanctions

I understand that if I breach this Individual Code of Conduct, my employer will take disciplinary action, which could include:

- Oral warning;
- Written warning;
- Additional training;
- Loss of up to one week's salary;
- Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months;
- Termination of employment; and
- Report to the police if warranted.

I hereby acknowledge that I have read the foregoing Individual Code of Conduct, agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS, GBV and VAC issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to take action mandated by this Individual Code of Conduct may result in disciplinary action and may affect my on-going employment.

Signature

.....Name.....
.....

Title

.....Date.....
.....

FOR CONTRACTOR’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 Contractor’s contact person with relevant experience in handling gender-based violence] requesting an explanation.

Name of Contractors personnel:

Signature:

Date: [Day Month year]

Countersignature of authorized representative of the Contractor:

Signature:

Date: [Day Month Year]

5.4 GBV TRAINING MODULE

To properly address GBV, the training and sensitizing of workers is essential. These workers include civil works contractors (including sub-contractors and suppliers), supervision consultants, other consultants who may have a presence in the project adjoining communities - as well as the Implementing Agency (IAs). Projects can seek to embed training modules that incorporate GBV into the regular Occupational Health and Safety (OHS) 'toolbox' meetings with workers, official training and/or standalone training efforts. Linking the curriculum to actors outside the project such as health and education sector professionals may also be beneficial. Training on GBV should be thorough and proportional to the GBV risk. The modality, frequency and content of the training are outlined in the table below.

At a minimum, training shall include:

- What GBV, particularly SEA and SH, is and how the project can exacerbate GBV risks;
- Roles and responsibilities of actors involved in the project (the standards of conduct for project-related staff captured in CoCs);
- GBV incident reporting mechanism including information about SH for project workers, accountability structures, and referral procedures within agencies and for community members to report cases related to project staff;
- Services available for survivors of GBV; and, adoption of survivor centred approach
- Follow-up activities to reinforce training content.

As projects are implemented, training/awareness on GBV should be made available to the project-affected communities so they can learn about the roles and responsibilities of actors involved in the project, CoC, services available, processes for reporting incidents of project-related GBV, and the corresponding accountability structures. Training of both project-affected communities and project implementers allows all stakeholders to understand the risks of GBV, as well as appropriate mitigation and response measures, putting everyone on the same page.²⁰

Modality, frequency and content of training's

Group	Modality	Frequency	Topic
MoLSA	2-day virtual workshop including Power point presentations, Discussions, case studies and group work.	1-2 days orientation virtual workshops and FGDs every 6 months	<ul style="list-style-type: none"> ● Introduction on GBV, SEA and SH and the code of conduct, identified GBV risks in the project. ● National and state policies on SH and roles and responsibilities of GBV focal points. ● Management and coordination role of the PIU in the implementation of the GBV/SEAH Action Plan ● Potential GBV risks and hotspots in the project. ● Understanding of the roles and responsibilities in accordance with the Accountability and Results Framework. ● Mitigation strategies and effective implementation of the action plan. ● Survivor centred approaches ● Monitoring and reporting on GBV and GBV GM.
PIU Staff	1 day orientation programme on GBV. Power point virtual presentation, Discussions, sharing of best practices and group activities	Every 6 months (1 month after the PMC has been engaged)	<ul style="list-style-type: none"> ● Introduction on GBV, SEA and SH, identified GBV risks in the project. ● Working with contractors to prevent SH in the workplace (as well as within the agency and the contracting firms) and other forms of GBV in the project-affected communities (for example, through CoCs). ● Strengthening GMs and other monitoring mechanisms to provide safe and ethical reporting systems for project staff wishing to report cases of GBV, and their linkage
Workers /labors	One day orientation using virtual Power point presentations, discussions and group activities.	Every 6 months and daily discussion in tool box talks and during safety inductions	<ul style="list-style-type: none"> ● Explaining GBV, SEA and SH and key GBV risks identified. ● Key elements of the CoC. ● And zero tolerance policy on GBV. ● Available services/referral pathway ● SEAH reporting mechanism/GM
Community members/ vulnerable groups/leaders	One day orientation. Virtual Power point presentations Discussion and group activities	Every 3 months	<ul style="list-style-type: none"> ● Explaining GBV, SEA and SH in the context of the project, including identified GBV risks and hotspots. ● Survivor centred approaches ● Available services/referral pathway ● Awareness about the key mitigation strategies and GM mechanisms for GBV incidents and response. ● Their roles as GM focal points for continuous dialogue and feedback from the community for GBV prevention and mitigation and in safe referrals of survivors.

5.5 SEAH Case Registration Form

SEAH Case Registration Form	
Administrative Information	
1	Grievance ID
2.	Code of Survivor (Employ a coding system to ensure that client names are not easily connected with case information)
3.	Date of grievance registration
4.	Date of Incident
5.	Reported by survivor or an escort of the survivor, in the presence of the survivor
6.	Reported by someone other than the survivor without survivor present
Survivor Information	
7.	Gender / age
8.	Location / Residence
9.	Current civil/marital status
10.	Occupation
11.	Is the survivor a person with mental or physical disabilities?
12.	Is the survivor an unaccompanied or separated child?
13.	Was the perpetrator related to the project?
14.	Has Informed Consent been provided? yes/no?
15	Has the case been reported elsewhere (including police / lawyer/health services/psychosocial counseling, other)?
Sub-Section for Child Survivor	
16	If the survivor is a child (less than 18 years), does he or she live alone?
17	If the survivor lives with someone, what is the relation between her/him and the caretaker? (parent/guardian; elative; spouse; other)
18	What is the caretaker's current marital status?
Details of the Incident (in survivor's words)	
19	Details of the incident
20	Incident location and time
21	Were money, goods, benefits and/or services exchanged in relation to the incident?
Alleged Perpetrator Information	
22	Number of alleged perpetrators
23	Sex of alleged perpetrators
24	Age group of alleged perpetrator(s)
25	Indicate relationship between perpetrator(s) and survivor

26	Main occupation of the alleged perpetrator(s)	
26	Employer of the alleged perpetrator(s)	
Planned Actions / Actions Taken		
27	Was the survivor referred by anyone?	
28	Was the survivor referred to a safe house / shelter?	
29	Which services does the survivor wish to be referred to? <ul style="list-style-type: none"> • Psychosocial services • Legal services • Police • Health services • Livelihood program 	
30	What actions were taken to ensure the survivor's safety?	
31	Describe the emotional state of the client at the beginning of the report	
32	Other relevant information	

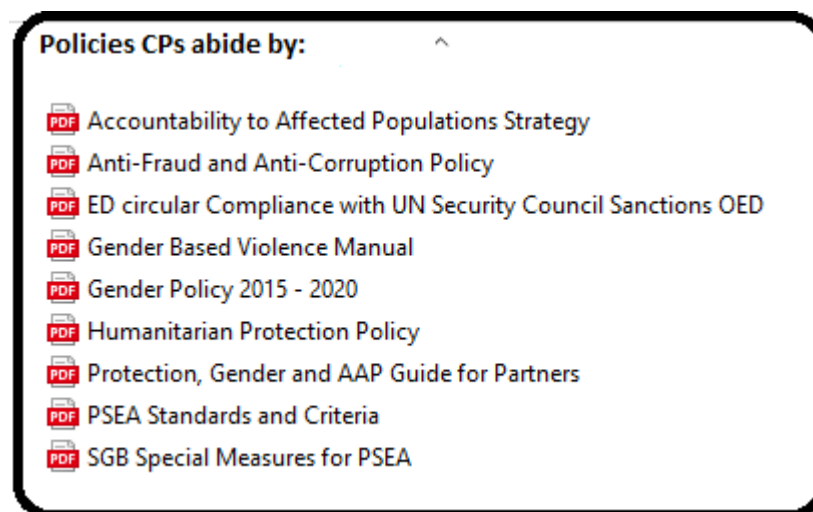
5.6 World Food Program GBV and Project Sexual Exploitation and Abuse protocols

GBV and PSEA:

WFP will institute a very clear beneficiary selection procedures to ensure that any ambiguity in this process is not exploited to unfairly favour non- eligible beneficiaries. In addition, the following is a summary of the mitigation measures put in place by WFP:-

WFP Corporate Policies on SEA: WFP has a zero-tolerance policy on SEA which focuses on acts committed against the people it serves, by WFP employees or others associated with its work. WFP adopted the Secretary-General's Bulletin on "Special Measures for Protection from Sexual Exploitation and Sexual Abuse" (ST/SGC/2003/13) in 2004 and has continued to reaffirm its commitment to protection from SEA with four Executive Director Circulars issued since then, the latest in 2014. Any acts of SEA constitute serious misconduct and is grounds for disciplinary measures, including summary dismissal and referral to enforcement authorities for criminal prosecution, where appropriate. WFP's policy on SEA covers acts which occur at or away from the workplace, during or outside working hours, including sexual activity with children (under the age of 18), exchange of money, employment, goods, assistance or services for sex, including sexual activity with prostitutes.

WFP Corporate SEA policies for Cooperating Partners: WFP's cooperating partners (CPs) are required to abide by WFP's regulations and to adhere to its commitments. By entering into an agreement with WFP, cooperating partners undertake to adhere to: (i) the standards set out in the Secretary-General's Bulletin Special Measures for Protection from Sexual Exploitation and Sexual Abuse (ST/SGB/2003/13); (ii) any minimum operating standards adopted as a result of the Statement of Commitment on Eliminating Sexual Abuse and Abuse by UN and Non-UN Personnel of 4 December 2006; and (iii) any other Protection from Sexual Exploitation and Abuse (PSEA) policy or guideline as may be adopted by WFP, and notified to the implementing partner by WFP from time to time. In addition, CPs need to ensure that their personnel, agents, contractors and subcontractors conform to the highest standards of moral and ethical conduct.



Training and capacity building of WFP staff: WFP provides mandatory training on prevention of harassment, SEA, ethics and standards of conduct to all its staff. WFP has designated PSEA focal points in all country offices to support senior managers to create an environment that prevents SEA, undertake awareness raising of WFP employees and partners, participate in in-country PSEA networks, and receive complaints and submit reports of SEA to the Office of Inspections and Investigations (OIGI).

Follow up training and capacity building of WFP Cooperating Partners & CFM operators: WFP and the Somalia Food Security Cluster (co-chaired by WFP) has provided training to its partners on gender and protection mainstreaming including the principles of humanitarian protection, and prevention of GBV and SEA. In addition, WFP will review any gaps and provide refreshers to the CFM operators as the primary interface with the communities recording and referring any GBV & SEA cases.

WFP Somalia GBV Referral Protocol: WFP, in collaboration with the GBV sub-cluster in Somalia, has developed a GBV referral and programming protocol that outlines WFP's corporate strategy on GBV, particularly on reporting and referring cases for medical, legal or psychosocial assistance, as well as working with GBV survivors.

Community consultations and sensitization: As elaborated in the earlier section on Community based Participatory Approach, special mention is being provided under this section owing to the seriousness assigned to Protection, GBV, PSEA and Accountability to Affected Population (AAP) by WFP. In identifying risks related to sexual exploitation and abuse (SEA) and gender-based violence to the community, local leadership and partners, every precaution and sensitivity will be adhered in use of language, presentation of the case to identify any GBV risks and immediate referral of any cases that may arise from participants, voluntarily sharing issues, during this initial stage of consultations. These identified risks will be noted during the community consultations and factored into the project delivery. With keeping to the principles of 'do no harm' the confidentiality and welfare of the affected person will be of utmost priority for WFP.

Safety, access and security at each stage of the project: Security and safety to access the project services such as access to payment points, access to CPs/ CFM will be considered to ensure that no one is put in harm's way when participating in the project. For example, cash transfers (CTs) processed through mobile money.

Communication with beneficiaries throughout the project cycle: WFP will ensure that all community members, including non-beneficiaries, are aware of the project design, ability to participate and channels of complaints so that there is transparency and accountability at each step of the project.

SEA monitoring in cash-based transfers: WFP will undertake referrals of GBV cases as per established protocol and follow up these cases. Please refer to Section 14 (pg.32) under the Complaints and Feedback system of this document.