

Good  
Practice  
Note

# Environmental & Social Framework for IPF Operations

## Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works

Third Edition



*Good Practice Notes (GPNs) are produced to help World Bank staff in providing implementation support to Borrowers in meeting the requirements of the Environmental and Social Framework (ESF). They are written in a style and format that is intended for all staff and development partners to use. GPNs are advisory in nature and are not World Bank policy nor are they mandatory. They will be updated according to emerging good practice.*

Third Edition

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The first edition of this Good Practice Note (GPN), titled “Good Practice Note on Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works,” was published September 28, 2018. It was prepared by a team from the then Transport Global Practice and the Gender Group, comprised of Christopher R. Bennett, Diana J. Arango, Nora Weisskopf and Keelye Hanmer under the guidance of Franz Drees-Gross, Caren Grown and Maninder Gill. Key inputs and support were provided by Verena Phipps-Ebeler, Michael Mahrt, Subha Latchmi Ram, Qays Hamad, Nathalie Munzberg, Tesfaalem Gebreyesus, Deviyani Dixit and the GTDDR Task Force for GBV members, including Karla Gonzalez Carvajal, Julie Babinard, Karla Dominguez Gonzalez, and Nato Kurshitashvili.

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### **Second Edition**

The second version was updated to incorporate: definitions of sexual exploitation and abuse and sexual harassment (SEA/SH) and their operationalization in Bank-financed projects; updated language changing Gender Based Violence (GBV) to SEA/SH where relevant; and additional information on third-party monitoring of SEA/SH.

The second edition was prepared by a team including Caren Grown, Diana Arango, Victor Mosoti, Maninder Gill, Charles Di Leva, and Enzo De Laurentiis. Support was provided by Ian White and editing by Katherin George Golitzen.

### **Third Edition**

The present edition has been updated to clarify specific aspects related to sexual exploitation and abuse of children and to align with the Good Practice Note on Addressing SEA/SH in Human Development Operations, issued in September 2022.

The third edition was prepared by a team including Caren Grown, Maninder Gill, Charles Di Leva, Michael Mahrt, Celine Calve, Bethany Kriss, Diana J. Arango, Verena Phipps, Niyati Shah, Daniela Greco. Key inputs and support were provided by Colin Scott and Maree Newson.

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# Abbreviations

<b>BIA</b>	Best interests assessment
<b>BID</b>	Best interests determination
<b>CoC</b>	Code of Conduct
<b>E&amp;S</b>	Environmental and Social
<b>ESA</b>	Environmental and Social Assessment
<b>ESCP</b>	Environmental and Social Commitment Plan
<b>ESF</b>	Environmental and Social Framework
<b>ESHS</b>	Environmental, Social, Health and Safety
<b>ESIRT</b>	Environment and Social Incident Response Toolkit
<b>ESMP</b>	Environmental and Social Management Plan
<b>ESS</b>	Environmental and Social Standard
<b>GBV</b>	Gender-based Violence
<b>GCLS</b>	Grievance Complaint Logging System
<b>GPN</b>	Good Practice Note
<b>GM</b>	Grievance Mechanism
<b>HIV/AIDS</b>	Human Immunodeficiency Virus/Acquired Immune Deficiency Syndrome
<b>IA</b>	Implementing Agency
<b>ICB</b>	International Competitive Bidding
<b>IPF</b>	Investment Project Financing
<b>ISR</b>	Implementation Status Report
<b>IVA</b>	Independent Verification Agent
<b>M&amp;E</b>	Monitoring and Evaluation
<b>NCB</b>	National Competitive Bidding
<b>NGO</b>	Nongovernmental Organization
<b>PCN</b>	Project Concept Note
<b>PMU</b>	Project Management Unit (also often referred to as a Project Implementation Unit, or PIU)
<b>QER</b>	Quality Enhancement Review
<b>SBD</b>	Standard Bidding Document
<b>SEA</b>	Sexual Exploitation and Abuse
<b>SH</b>	Sexual Harassment

<b>SEP</b>	Stakeholder Engagement Plan
<b>SPD</b>	Standard Procurement Document
<b>TOR</b>	Terms of Reference
<b>TPM</b>	Third-Party Monitoring organization for SEA
<b>UN</b>	United Nations
<b>UNICEF</b>	United Nations International Children’s Fund
<b>VAC</b>	Violence Against Children
<b>VAW/VAWG</b>	Violence Against Women/Violence Against Women and Girls
<b>WHO</b>	World Health Organization

# Glossary

<b>Best Interest of the Child</b>	Children have the right to have their best interests assessed and taken into consideration in all actions that concern them, both in the public and private spheres. The best interest of the child is determined by a variety of individual circumstances, such as the age, gender, level of maturity and experiences of the child. Other factors also determine well-being, such as the presence or absence of parents, the quality of the relationships between the child and their family or caregivers, the physical and psychosocial situation of the child and their protection situation (security, protection risks, etc.). Children should be active participants in defining their best interests. All of these circumstances and elements should be considered and balanced against each other by any decision-maker having to determine a child’s best interest <sup>1</sup> .
<b>Best Interest Assessment (BIA)</b>	<b>Best Interest Assessment</b> refers to an assessment of children’s best interests conducted by organizations with required expertise and requires the participation of the child. An assessment of children’s best interest is also required within national systems and can have legal implications.
<b>Best Interest Determination (BID)</b>	<b>Best Interest Determination</b> is used to describe the formal UNHCR process, which has strict procedural safeguards designed to determine the child’s best interests when taking particularly important decisions affecting the child in contexts of displacement. <sup>2</sup> It should facilitate adequate child participation without discrimination, involve decision-makers with relevant areas of expertise and balance all relevant factors to assess and determine the best option.
<b>Child</b>	Article 1 of the UN “Convention on the Rights of the Child” defines children as those under the age of 18. The UN Secretary General’s Bulletin on Special Measures for protection from sexual exploitation and abuse, October 9, 2003 ST/SGB/2003/13 also defines children as anyone under the age of 18 and explicitly prohibits sexual activity with a child regardless of the age of majority or age of consent locally (para 3.2 b).
<b>Child marriage</b>	Child marriage refers to any formal marriage or informal union between a child under the age of 18 and an adult or another child (UNICEF).

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<sup>1</sup> This definition is based on article 3 of the Convention on the Rights of the Child and is used by UNICEF and UNHCR and a wide range of actors working to protect children. See “Convention on the Rights of Child” and UNHCR 2021, Best Interest Procedures Guidelines: Assessing and Determining the best interest of the child.

<sup>2</sup> 2021 UNHCR, Best Interest Procedures Guidelines: Assessing and Determining the best interest of the child, Definitions and Explanations of key terms, Pages 9. and 10.

**Engineer** The Borrower’s representative who is responsible for supervising the works. The supervising Engineer is appointed by the Borrower, who specifies the tasks they want the supervising Engineer to carry out (frequently set out in a Terms of Reference (TOR)). Responsibilities may include: monitoring the site, contractor(s) and personnel to make sure the agreed contract is followed; measuring contractor’s achievement against key performance indicators; making decisions on behalf of the Borrower in areas delegated for day-to-day control and; supervising environmental and social issues. Depending on the needs of the project and the supervising Engineer’s TOR, the team supporting the supervising Engineer may need to include individuals with specific skills, for example E&S specialists and GBV specialists.

**Supervising Engineer** is the term used in the context of large civil works, which is the focus of this GPN. Different terms may be used to describe the role conducted by the supervising Engineer, including “supervising consultant”. Note that under the FIDIC contract, which is commonly used for large civil works in projects supported by the World Bank, the supervising Engineer is referred to simply as the “Engineer”.

**Gender-based violence (GBV)** Gender-based violence (GBV) is an umbrella term for any harmful act that is perpetrated against a person’s will and that is based on socially-ascribed (i.e., gender) differences between males and females. It includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private (2015 Inter-Agency Standing Committee Gender-based Violence Guidelines, pg. 5).

**Gender-based violence (GBV) service provider** An organization offering specific services for GBV survivors, such as health services, psychosocial support, shelter, legal aid, safety/security services, etc.

**Human trafficking** Trafficking in persons is defined as the recruitment, transportation, transfer, harboring or receipt of persons by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power, or of a position of vulnerability, or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purposes of exploitation. Women and children are particularly vulnerable to trafficking practices (Environmental and Social Standard (ESS) 2, footnote 15).

**SEA/SH Prevention and Response Action Plan** Document which outlines how the project will put in place the necessary protocols and mechanisms to address SEA/SH risks; and how to address any SEA/SH allegations that may arise. This is the new name for the GBV Action Plan, as used in the original (2018) version of this note.

The SEA/SH Prevention and Response Action Plan should include an Accountability and Response Framework, which details how allegations of SEA/SH will be handled (investigation procedures) and disciplinary action for violation of the Code of Conduct (CoC) by workers.





**Violence against women (VAW)**

Article 1 of the 1993 UN *Declaration on the Elimination of Violence against Women* defines violence against women as any act of gender-based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life. Article 2 of the Convention further states that violence against women shall be understood to encompass, but not be limited to, the following: (a) physical, sexual and psychological violence occurring in the family, including battering, sexual abuse of female children in the household, dowry-related violence, marital rape, female genital mutilation and other traditional practices harmful to women, non-spousal violence and violence related to exploitation; (b) physical, sexual and psychological violence occurring within the general community, including rape, sexual abuse, sexual harassment and intimidation at work, in educational institutions and elsewhere, trafficking in women and forced sex work; (c) physical, sexual and psychological violence perpetrated or condoned by the State, wherever it occurs. The term **violence against women and girls** is also used.

# 1. Introduction

1. No country, community, or economy can achieve its potential or meet the development challenges of the 21st century without the full and equal participation of women and men, girls and boys. The World Bank is therefore committed to closing gaps between males and females globally for lasting impact in tackling poverty and driving sustainable economic growth that benefits all (World Bank, 2018).<sup>4</sup>
2. Worldwide, 30 percent of women have experienced either non-partner sexual violence or physical and/or sexual intimate partner violence (IPV) (WHO 2021), both manifestations of Gender-Based Violence (GBV).<sup>5</sup> Every community in which the World Bank has operations includes women and children who have experienced or will experience GBV. Out of 189 economies surveyed by the Women Business and the Law report of 2018, 69 percent were found to have legislation addressing sexual harassment in employment.
3. This Good Practice Note (GPN) focuses on specific forms of GBV that may arise in relation to major civil works<sup>6</sup> projects supported by the World Bank through Investment Project Financing (IPF): sexual exploitation and abuse (SEA) and sexual harassment (SH) (hereafter referred to as SEA/SH). There are a number of ways SEA/SH may occur in the context of Bank-financed projects, by a range of perpetrators. For example:
  - Projects with a large influx of workers may increase the demand for sex work—even increase the risk for trafficking of women for the purposes of sex work—or the risk of forced early marriage in a community where marriage to an employed man is seen as the best livelihood strategy for an adolescent girl. Furthermore, higher wages for workers in a community can lead to an increase in transactional sex. The risk of incidents of sexual activity between laborers and minors, even when it is not transactional, can also increase.
  - When land redistribution occurs—for example due to resettlement for civil works—women may be extremely vulnerable to SEA. This is particularly true in countries where the legal system precludes women from holding land titles.
  - Projects create changes in the communities in which they operate and can cause shifts in power dynamics between community members and within households. These power dynamics are a key driver of GBV and can be triggered by labor influx on a project when male workers are believed to be interacting with community women. Hence, abusive behavior can

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<sup>4</sup> The World Bank, *The World Bank in Gender*, available at: <http://www.worldbank.org/en/topic/gender>.

<sup>5</sup> GBV also affects men and boys as well as sexual minorities or those with gender-non-conforming identities. GBV affects people throughout their lives, with profound, long-term impacts on survivors' health, agency, achievement and well-being.

<sup>6</sup> Major civil works include construction, maintenance and/or upgrading of infrastructure (transport, energy, water & sanitation, irrigation and urban infrastructure, school or hospital construction, etc.) and related supervision oversight, as well as technical assistance activities related to such projects.

occur not only between project staff and those living in and around the project site, but also within the homes of those affected by the project.

- Job opportunities for women and girls can be limited due to a lack of appropriate transportation options. While Bank-financed projects create job opportunities for women within projects, traveling to and from work in some settings can force women and girls to use unsafe, poorly-lit commuter routes, or unsafe public transport which can expose them to harassment and abuse. The increased risk of experiencing violence may thwart their uptake of added economic opportunities.
4. The World Bank has developed GPN to assist Task Teams in identifying risks of SEA/SH – as opposed to all forms of GBV that can emerge in IPF involving major civil works contracts – and to advise Borrowers on how to best manage such risks. The GPN builds on World Bank experience, relevant international instruments, and good international industry practices, including those of other development partners. While World Bank Task Teams are the primary audience, the GPN also aims to contribute to a growing knowledge base on the subject.
  5. GPNs are prepared to support the implementation of the Environmental and Social Framework (ESF) in World Bank financed operations. **This GPN, however, is designed to apply not only to new projects under the ESF, but also to assist in addressing SEA/SH risks in projects that are currently under preparation and pre-date the ESF.**
  6. The ESF’s Environmental and Social Standards (ESSs) set out the requirements for Borrowers relating to the identification and assessment of environmental and social risks and impacts associated with projects supported by the World Bank. While the ESF itself does not explicitly mention SEA/SH, various ESSs are in alignment with the recommendations of this GPN for addressing SEA/SH, including:
    - ESS1: Assessment and Management of Environmental and Social Risks and Impacts;
    - ESS2: Labor and Working Conditions;
    - ESS4: Community Health and Safety; and
    - ESS10: Stakeholder Engagement and Information Disclosure.
  7. This GPN also forms part of the World Bank’s response to the 2017 recommendations of an independent Task Force<sup>7</sup> of external experts (hereinafter called the “2017 GBV Task Force Report”), which provided guidance on how the World Bank could strengthen its systems to prevent and mitigate GBV, in particular SEA/SH, in the projects it finances.
  8. The GPN is guided by several key principles:

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<sup>7</sup> Gupta, Geeta Rao and Katherine Sierra. 2017. Working Together to Prevent Sexual Exploitation and Abuse: Recommendations for World Bank Investment Projects (English). Report of the Global Gender-based Violence Task Force. Washington, D.C. World Bank Group.

<http://documents.worldbank.org/curated/en/482251502095751999/Working-together-to-prevent-sexual-exploitation-and-abuse-recommendations-for-World-Bank-investment-projects>.

- 1) *Be survivor-centered*: Approach considerations related to SEA/SH mitigation and response through a survivor-centered lens,<sup>8</sup> protecting the confidentiality of survivors; practicing non-discrimination, centering their safety, and treating them with agency, dignity and respect for their needs. For adults it means following the survivor’s wishes and recognizing the survivor as the principal decision maker in their own care. For children it means ensuring that the best interest of the child is always the primary consideration in all actions concerning a child. In relation to incidents of SEA/SH involving children, the child’s wishes and opinions on their situation should be considered in determining the best interests of the child.<sup>9</sup>
- 2) *Emphasize prevention*: Adopt risk-based approaches that aim to identify key risks of SEA/SH and to undertake measures to prevent or minimize harm.
- 3) *Build on existing local knowledge*: Engage community partners—local leaders, civil society organizations, gender and child advocates—as resources for knowledge on local-level risks, effective protective factors and mechanisms for support throughout the project cycle.
- 4) *Be evidenced-based*: Build on existing global research and knowledge on how to address GBV effectively.
- 5) *Be adaptable*: Adapt and adjust prevention and mitigation measures to respond to the unique drivers and context in any given setting, using the operational guidance presented in this GPN, which provides the foundation for an effective SEA/SH risk management approach.
- 6) *Minimize harm to survivors*:<sup>10</sup> The project staff must be trained on how to preserve the confidentiality and safety of survivors while safety planning, and/or referring survivors to services. Survivors may suffer physical harm and other forms of violence if partners/perpetrators discover that they have been talking to others about their personal relationships. Because many violent partners/perpetrators control the actions of women with whom they are in a relationship, even the act of speaking to another person without their permission may trigger a woman’s abuse. As such, asking survivors or complainants about violence should be confidential, and should take place in complete privacy, with the exception of children under the age of two. Consent for any data collection, even as part of an incident case file, should be offered and if anonymity can be guaranteed, it should also be provided. Where mandatory reporting requirements apply, any complainant should be advised of this **before** they share information or disclose any incident of GBV.

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<sup>8</sup> See glossary of terms for the definition of a survivor-centered approach, best interests of the child, best interests assessment and best interests determination.

<sup>9</sup> For specific guidance on children’s participation in decision-making by age group, see IRC and UNICEF, *Caring for Child Survivors of Sexual Abuse Guidelines, Case Management for Child Survivors*, p. 102, available at: <https://www.unicef.org/documents/caring-child-survivors-sexual-abuse>.

<sup>10</sup> *Violence Against Women and Girls (VAWG) Resource Guide – Introduction*, available at: <https://www.worldbank.org/content/dam/Worldbank/document/Gender/VAWG%20Resource%20Guide%20Introduction%20July%202014.pdf>.

- 7) *Enable continuous monitoring and learning*: Ensure operations integrate mechanisms for regular monitoring and feedback to track effectiveness and to build internal knowledge of what works to prevent, mitigate and respond to SEA/SH.

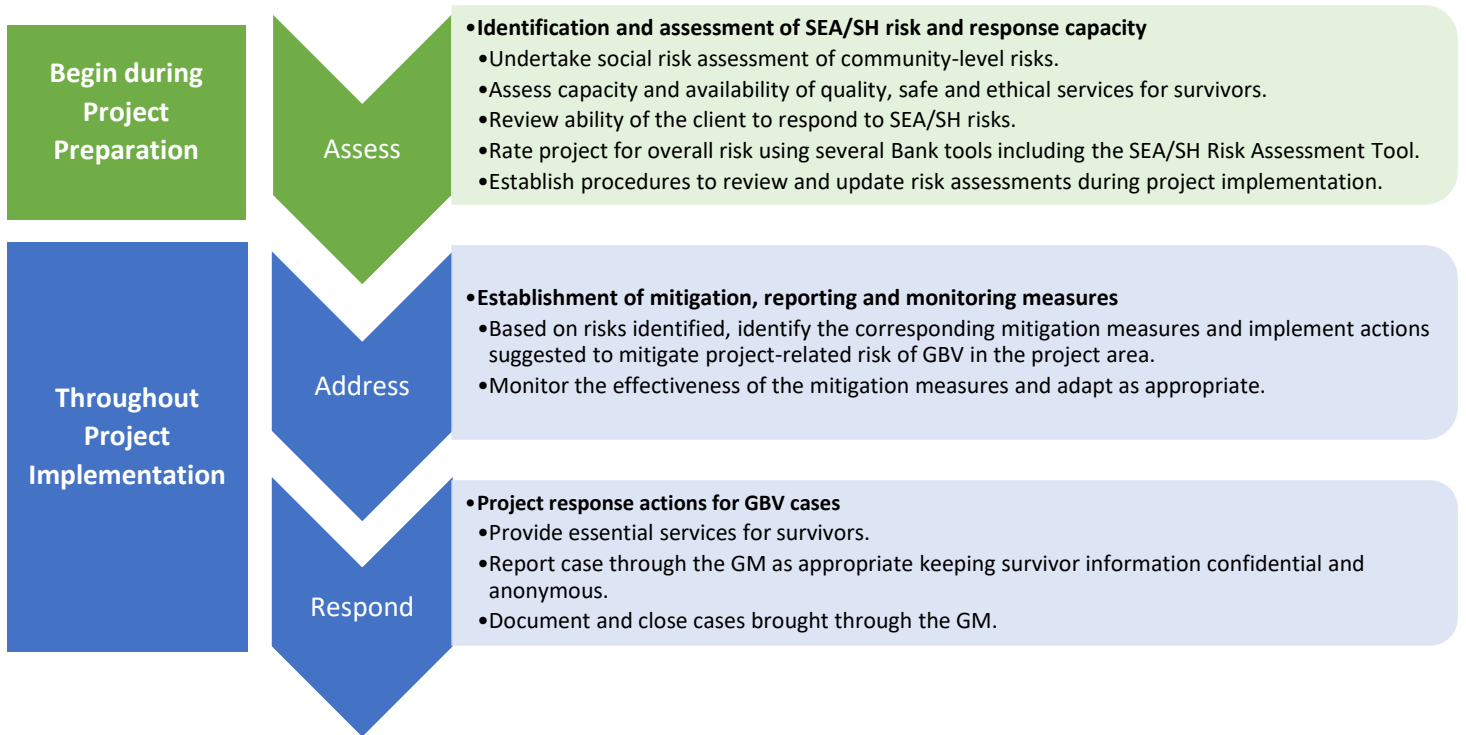
## Scope and Structure of this GPN

9. This GPN applies to IPF in any World Bank Global Practice that involves major civil works, defined here as civil works large enough to be carried out by a contractor, i.e., not small-scale projects such as community-driven development investments, which often involve self-construction by beneficiary communities. The recommendations here do not apply to Development Policy Financing and Program-for-Results operations. The GPN also does not focus on addressing GBV through specific infrastructure design-related interventions (e.g., appropriate lighting in public transit spaces, construction of schools with toilets that are lockable and physically located in opposite areas for girls and boys). Some examples of how to prevent and respond to GBV through project design and implementation can be found in the online resource: [Violence Against Women and Girls Resource Guide](#).
10. The GPN is structured around three key steps that cover project preparation and implementation (see **Figure 1**).
  - First, identify and **assess** the risks of SEA/SH, including social and capacity assessments. Ideally, this is done during project preparation, with the understanding that SEA/SH risk assessment is a continuous process and should take place throughout the project life cycle as SEA/SH can occur at any moment.
  - Second, **address** the risks by identifying and implementing appropriate SEA/SH risk mitigation and monitoring measures.
  - Third, **respond and refer** any reported GBV allegations to GBV service providers, whether related to the project or not. Projects should include effective monitoring and evaluation (M&E) mechanisms, which meet the World Bank’s requirements on SEA/SH and allow for reporting on allegations that are project-related and for monitoring case follow-up.
11. Resource materials to assist with implementing the GPN recommendations, such as Terms of References (TOR), and examples of Codes of Conduct (CoCs) and assessments, are available to Task Teams through their GBV Focal Point.<sup>11</sup>

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<sup>11</sup> Example documents are also available on the WBG Intranet GBV page: <https://worldbankgroup.sharepoint.com/sites/WBGender/sitepages/publishingpages/information-about-sexual-exploitation-abuse-and-harassment-in-world-bank-operations-03172021-112450.aspx>

**Figure 1: Assessing, Addressing and Responding to SEA/SH in IPF Involving Major Civil Works**



## 2. GBV Considerations in Investment Project Financing involving Major Civil Works

12. This chapter describes the broader context of Gender-Based Violence (GBV), including GBV against children, and then highlights the specificities of SEA/SH. These are the forms of GBV that are the focus of project screening and mitigation measures in this note. The Bank strongly condemns all acts of GBV, and any allegation of GBV reported to a World Bank-financed IPF will be referred to available quality service providers.

### GBV – An Umbrella Term

13. GBV is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially-ascribed gender differences. GBV includes acts that inflict physical, mental, sexual harm or suffering; threats of such acts; and coercion and other deprivations of liberty, whether occurring in public or in private life. GBV disproportionately impacts women, girls and LGBTQI+ individuals across their lifespan and takes many forms, including sexual, physical, and psychological abuse. It occurs at home, on the streets, in schools, workplaces, farm fields, and refugee camps; during times of peace as well as in conflicts and crises.

14. The term GBV is most commonly used to refer to violence perpetrated by men against women girls and its prevalence is correlated with systemic inequality between males and females—which exists in every society in the world.<sup>12</sup> GBV acts as a unifying and foundational term for most forms of violence perpetrated against women and girls (VAWG).<sup>13</sup> The term GBV stems from the 1993 United Nations (UN) Declaration on the Elimination of Violence against Women, which defines violence against women as “any act of gender-based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women.” Women and girls, men, boys, and transgender or nonbinary people may all experience GBV. Discrimination on the basis of sex, sexual orientation, or gender identity is not only a cause of many forms of GBV, but also contributes to the widespread acceptance and invisibility of such violence—so that perpetrators are not held accountable and survivors are discouraged from speaking out and accessing support. The prevention and mitigation measures proposed in this GPN apply to all SEA/SH affected individuals.

15. To understand if an act of violence is an act of GBV, one should consider whether the act reflects and/or reinforces socially-ascribed gender norms or unequal power relations between males and females.

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<sup>12</sup> See, for example, Heise and Kotsadam, “Cross-national and multilevel correlates of partner violence: an analysis of data from population-based surveys,” 2015, *Lancet Global Health*, available at: <https://pubmed.ncbi.nlm.nih.gov/26001577/>.

<sup>13</sup> The term GBV is often used interchangeably with Violence against Women and Girls (VAWG). See Arango, D., M. Morton, F. Gennari, S. Kiplesund, and M. Ellsberg. 2014. *Interventions to Prevent and Reduce Violence Against Women and Girls: A Systematic Review of Reviews*. Women's Voice, Agency, and Participation Research Series. Washington, DC: World Bank.

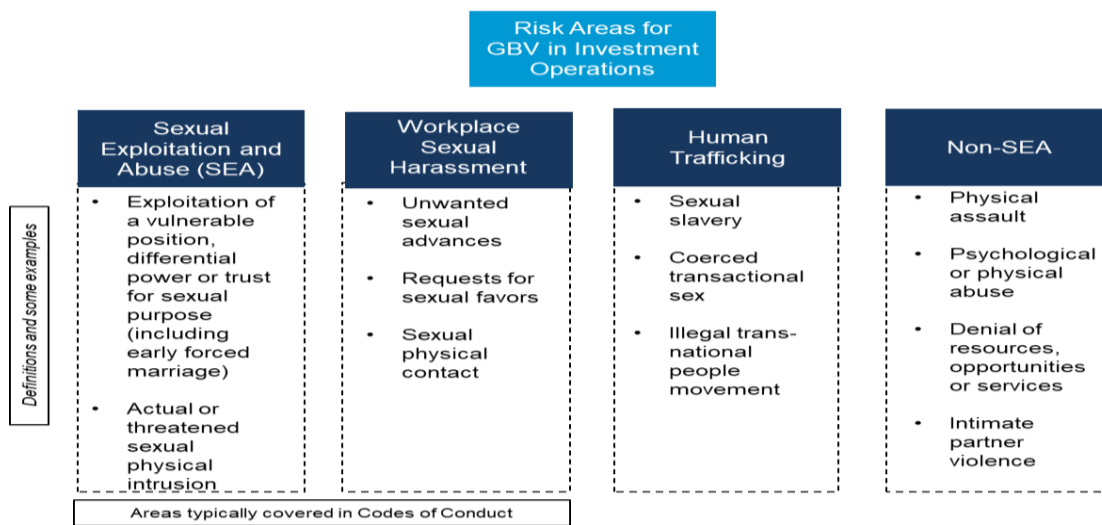


16. Many—but not all—forms of GBV are criminal acts in national laws and policies. This differs from country to country, and the practical implementation of laws and policies can vary widely. Widespread impunity is a barrier in both developed and developing countries, and weak implementation of laws is characteristic in low- and middle-income settings.<sup>14</sup>
17. Most countries have specific laws prohibiting sexual violence against children, but implementation of those laws varies greatly. Most countries have more severe punishment for sexual violence against children than for sexual violence against adults and most countries have laws that consider any sexual relationship with a child under a certain age to be rape, regardless of consent.<sup>15</sup>

### Sexual Exploitation and Abuse and Sexual Harassment

18. SEA and SH are manifestations of GBV. There are four broad categories of GBV that may be relevant to World Bank-financed IPF involving major civil works. However, since SEA and workplace SH are the types of GBV most relevant to IPF, the risk identification and mitigation of these forms of GBV are the primary focus of this GPN.

**Figure 2: Types of GBV that May Be Relevant Risk Areas for IPF Involving Major Civil Works**



<sup>14</sup> See, for example, United Nations Office on Drugs and Crime (UNODC), 2019, Handbook for the Judiciary on Effective Criminal Justice Responses to Gender-based Violence against Women and Girls, available at: [https://www.unodc.org/pdf/criminal\\_justice/HB\\_for\\_the\\_Judiciary\\_on\\_Effective\\_Criminal\\_Justice\\_Women\\_and\\_Girls\\_E\\_ebook.pdf](https://www.unodc.org/pdf/criminal_justice/HB_for_the_Judiciary_on_Effective_Criminal_Justice_Women_and_Girls_E_ebook.pdf); and Hughes, Christine, 2017, “Legislative Wins, Broken Promises: Gaps in implementation of laws on violence against women and girls,” Oxfam Research Reports, Oxfam Canada, available at: <https://oxfamilibrary.openrepository.com/bitstream/handle/10546/620206/rr-legislative-wins-broken-promises-vawg-080317-en.pdf>.

<sup>15</sup> WHO, Global status report on preventing violence against children, 2020, Part 1 – Current Global State of Preventing Violence Against Children, page 34, available at: <https://www.who.int/teams/social-determinants-of-health/violence-prevention/global-status-report-on-violence-against-children-2020>.

19. In the context of Bank-financed projects, project beneficiaries or members of project-affected communities (both adults and children) may experience SEA. A Bank-financed project may introduce goods, benefits or services to a project-affected community, either momentarily or indefinitely. Project workers may broker access to the goods, benefits or services that are Bank financed. This creates a power differential between the project worker who uses access to the goods, benefits or services to extract gain or favor from those who seek them. The power differential is created when a project worker has real or perceived power over a resource that can then be used to leverage or pressure a community member into an unwanted sexual act. If the project worker uses this differential power to extract sexual gain, he is sexually exploiting a project beneficiary.
20. SEA versus SH: SEA occurs against a beneficiary or member of the community. SH occurs between personnel/staff and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature. The distinction between SEA and SH is important so that agency policies and staff training can include specific instructions on the procedures to report each.

**Table 1: Operationalizing SEA/SH Definitions**

Definition	Bank Operationalization	Example
<p><b>Sexual Exploitation:</b> Any actual or attempted 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. Any sexual exploitation of a minor is also sexual abuse (see below)</p>	<p>In Bank-financed operations/projects, sexual exploitation occurs when access to or benefit from Bank-financed goods, works, non-consulting services or consulting services is used to extract sexual gain.</p>	<ul style="list-style-type: none"> <li>- A community member is promised employment on the World Bank-financed project site in exchange for sex.</li> <li>- A project worker connecting water lines to homes requests a sexual favor for access to water connection.</li> <li>- A project worker denies a woman passage through the worksite unless she performs a sexual favor.</li> <li>- A project worker is housed in the community near to the worksite. He pays for school fees in exchange for sexual activity with the family's adolescent daughter.</li> </ul>
<p><b>Sexual Abuse:</b> Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.</p>	<p>In Bank-financed operations/projects, sexual abuse occurs when a project worker (contractor staff, subcontractor staff, supervising engineer) uses force or unequal power vis-a-</p>	<ul style="list-style-type: none"> <li>- A project worker abuses a community member.</li> <li>- A project worker has a sexual relationship with an underage child.</li> </ul>

	<p>vis a community member or colleague to perpetrate or threaten to perpetrate an unwanted sexual act.</p>	<ul style="list-style-type: none"> <li>- A project worker befriends an underage child, supporting her and/or her family in exchange of sexual favors.</li> <li>- A project worker stays in the cafeteria after dinner and sexually assaults a kitchen staff member.</li> <li>- A project worker touches an administrative staff member’s body repeatedly.</li> <li>- A project worker sexually assaults an adolescent girl on a pedestrian rural road adjacent to the worksite.</li> </ul>
<p><b>Sexual Harassment:</b> Any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.</p>	<p>In Bank-financed operations/projects, sexual harassment occurs within the context of the company of a subcontractor or contractor and relates to employees of the company experiencing unwelcome sexual advances or requests for sexual favors or acts of a sexual nature that are offensive and humiliating among the same company’s employees.</p>	<ul style="list-style-type: none"> <li>- A project worker sends sexually explicit text messages to a coworker.</li> <li>- A project worker leaves an offensive picture that is sexually explicit on a co-worker’s desk.</li> <li>- A project worker asks all female employees to greet him with a kiss on the cheek every day before work.</li> <li>- A project worker compliments his co-worker’s body.</li> <li>-A project worker continuously invites a co-worker out for drinks or dinner after being told that they are not interested.</li> </ul>

*SEA/SH and Consent*

21. **Consent** is a key consideration in GBV particularly with regards to SEA/SH. GBV arises when consent is not voluntarily and freely given. Consent must be informed, based on a clear appreciation and understanding of the facts, implications and future consequences of an action. In order to give consent, the individual concerned must have all relevant facts at the time consent is given and be able to evaluate and understand the consequences of an action. The individual also must be aware of and

have the power to exercise the right to refuse to engage in an action and/or to not be coerced (i.e., by financial considerations, force or threats). There are instances where consent might not be possible due to cognitive impairments and/or physical, sensory, or developmental disabilities.

22. There is no consent when agreement is obtained through:
- The use of threats, force or other forms of coercion, abduction, fraud, manipulation, deception, or misrepresentation;
  - The use of a threat to withhold a project benefit to which the person is already entitled; or
  - A promise made to the person to provide a benefit from the project.

### *SEA and Children*

23. Children are considered unable to provide consent because they do not have the ability and/or experience to anticipate the implications of an action, and they may not understand or be empowered to exercise their right to refuse. **The World Bank considers children as anyone under the age of 18—even if national law may have a lower age—and, as such, not able to give free and voluntary consent.**<sup>16</sup> Even if a child agrees to a sexual relationship, that does not constitute consent.<sup>17</sup> As shown in Annex 1, this definition is reflected in the CoC requirements in the World Bank’s Standard Procurement Documents (SPDs). Mistaken belief regarding the age of the child and consent from the child is not a defense in SEA of children. Any sexual activity between an adult and an individual below the age of 18 is therefore considered child sexual abuse, except in cases of pre-existing marriage.<sup>18</sup>
24. As part of conditions of their employment, project staff and personnel must not participate in sexual contact or activity with anyone below the age of 18. Mistaken belief regarding the age of a child is not a defense. The CoC should therefore include provision to prohibit sexual relationship with anyone under the age of 18.

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<sup>16</sup> Articles 1 of the UN “Convention on the Rights of the Child” defines children as those under the age of 18. The UN Secretary General’s Bulletin on Special Measures for protection from sexual exploitation and abuse, October 9, 2003 ST/SGB/2003/13 also defines children as anyone under the age of 18 and explicitly prohibits sexual activity with a child regardless of the age of majority or age of consent locally (para 3.2 b).

<sup>17</sup> Because a child is not mature enough to understand the consequences and implications of sexual relationships, they may give assent, but this can not and should not be construed as consent.

<sup>18</sup> The age of consent has important implications for workers employed on World Bank-financed projects. If a worker is married to someone under the age of 18 and that marriage is recognized by a public, religious or customary authority and consistent with the legal age for marriage in the country, such underage marriage shall not constitute a reason not to employ the worker. Under any circumstances other than these, Codes of Conduct shall prohibit workers from engaging in sexual intercourse with anyone under the age of 18. If a worker engages in sexual intercourse with anyone under the age of 18 while employed under the project, a range of employment sanctions shall apply, as set out in the Code of Conduct, following a full and fair review.

25. <sup>19</sup>The United Nations International Children’s Fund (UNICEF) estimates that 10 percent of girls worldwide under the age of 18 (approximately 120 million) have experienced rape or other unwanted sexual acts.<sup>20</sup> Boys also report sexual abuse, although usually at lower levels than girls.<sup>21</sup>
26. There is a high co-occurrence of VAW and Violence against children (VAC) and risk factors are shared amongst them: unequal gender norms and discrimination, lack of responsive institutions, weak legal sanctions and impunity for VAC, cultural and legal acceptance of certain types of VAC, male dominance in the household, marital conflict with violence used for conflict resolution, and the harmful use of alcohol and drugs. Moreover, the link between witnessing violence in childhood and perpetrating or experiencing violence in adulthood is so strong that there is a high likelihood that preventing exposure to violence in childhood will prevent violence in adulthood and future generations.<sup>22</sup>
27. Supporting children who have experienced violence, including sexual violence, necessitates specific measures that differ from the response to GBV among adults. In particular, the provision of assistance/support to children should be guided by the application of best interests of the child principles. This GPN sets out good practices for responding to both adults and children who have experienced SEA/SH.<sup>23</sup>

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<sup>19</sup> According to the report *What Works to Prevent Sexual Violence Against Children: Evidence Review*, all children can be the target of sexual violence, and data suggest that girls are generally at higher risk for it. An analysis of available data for 24 countries (primarily in high- and middle-income countries) showed that sexual violence in childhood ranged from 8% to 31% for girls and 3% to 17% for boys. See, Ligiero, D., Hart, C., Fulu, E., Thomas, A., & Radford, L. (2019) *What Works to Prevent Sexual Violence Against Children: Evidence Review*, p. 13, available at: <https://www.togetherforgirls.org/wp-content/uploads/2019-11-15-What-Works-to-Prevent-Sexual-Violence-Against-Children-Evidence-Review.pdf>

<sup>20</sup> UNICEF, *Hidden in Plain Sight: A Statistical Analysis of Violence Against Children*, p. 167, available at: <https://data.unicef.org/resources/hidden-in-plain-sight-a-statistical-analysis-of-violence-against-children/>.

<sup>21</sup> Ligiero et. al., 2019, *What Works to Prevent Sexual Violence Against Children: Evidence Review*, p. 13, available at <https://www.togetherforgirls.org/wp-content/uploads/2019-11-15-What-Works-to-Prevent-Sexual-Violence-Against-Children-Evidence-Review.pdf>.

<sup>22</sup> Alessandra Guedes, Sarah Bolt, Claudia Garcia-Moreno and Manuela Colombini, 2016, “Bridging the gaps: a global review of intersections of violence against women and violence against children,” *Global Health Action*, 2016: 9: 31516, available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4916258/>.

<sup>23</sup> External resources covering responses to VAC include: (i) World Health Organization, 2017, Responding to children and adolescents who have been sexually abused: WHO Clinical Guidelines, available at: <https://apps.who.int/iris/bitstream/handle/10665/259270/9789241550147-eng.pdf>; (ii) IRC and UNICEF, 2012, *Caring for Child Survivors of Sexual Abuse*, available at: <https://www.unicef.org/documents/caring-child-survivors-sexual-abuse> ; and (iii) World Health Organization, 2016, *INSPIRE: Seven Strategies for Ending Violence Against Children*, available at: <https://www.who.int/publications/i/item/inspire-seven-strategies-for-ending-violence-against-children>.

### *Potential Perpetrators of SEA/SH*

28. For the purposes of this GPN, potential perpetrators of SEA/SH can be any personnel associated with the project and may include not only construction workers, but also consultants and project staff supervising the civil works or undertaking technical assistance activities or studies, or the security guards hired to protect a project site.
29. While labor influx clearly increases risk, the changes in local power dynamics that can arise with a new project mean that local workers or partners of local women and girls employed by the project may be at increased risk of becoming perpetrators of GBV. It is therefore important to consider broadly the range of potential perpetrators, combined with other contextual and project-related risks, to ensure projects integrate appropriate SEA/SH risk mitigation strategies. Risks of SEA/SH may arise in relation to an influx of laborers to complete civil works. However, risks may also arise in situations with no labor influx. In activities to raise awareness of SEA/SH and GBV service provision, violence that occurs at the hands of a variety of perpetrators should be addressed.
30. The World Bank’s guidance for assessing risks to communities from temporary project-induced labor influx is presented in the [2016 Labor Influx Guidance Note](#). The framework aims to help Task Teams screen projects to identify the risk profile for labor influx which then governs mitigation measures. The two key considerations of the labor influx impact risk profile are: (i) the scale of the labor influx; and (ii) the “absorptive capacity” of the local community to accommodate this influx. For example, an influx of 100 workers in a major urban area would generally have a low impact, while the same number in a remote rural area, or one where Indigenous Peoples live, would normally have a high impact. Other factors (e.g., cultural, duration of works) may further refine the risk assessment. Labor influx risk is a key element to be considered when assessing SEA/SH risk. Further information is given in the 2016 Labor Influx Guidance Note.

### 3. Assessing Risks and Capacity to Respond to SEA/SH

#### Introduction

31. When identifying risks, it is important to understand that there is no single driver of GBV, including SEA/SH. Research has identified multiple risk factors for GBV at the individual, relationship, community, institutional and policy levels. These include male-dominated household decision-making and income, policies and laws that discriminate against women, and cultural norms that justify or condone the use of violence against women and girls as a form of conflict resolution or discipline. GBV is experienced predominantly by women across all social and income groups.
32. The 2017 GBV Task Force Report used the ecological framework model to identify how SEA/SH risks may arise in IPF involving major civil works.<sup>24</sup> **Figure 3** below outlines some of the key risk factors that can contribute to SEA/SH in World Bank-financed projects, and these risk factors will be elaborated with ongoing implementation experience. Identifying and understanding project-related risk factors as they interact with other contextual risk factors is critical for development of appropriate prevention and mitigation measures in project design. **Risks change over time, so it is essential they are continuously monitored throughout the life of a project.**

**Figure 3: Example Risk Factors that Can Contribute to SEA/SH in World Bank-Financed Projects**

SOCIETAL	COMMUNITY	PERPETRATOR	FAMILY	INDIVIDUAL
<b>WORLD BANK PROJECT-RELATED</b>				
<p><i>National, regional</i></p> <ul style="list-style-type: none"> <li>Higher levels of GBV than regional average</li> <li>Low education levels of national labor force</li> <li>Limited GBV services; low capacity for GBV service provision for survivors; in particular, limited or no judicial or police services to facilitate redress for survivors</li> <li>Lack of specific legislation addressing incidence of GBV; weak implementation of existing legislation</li> </ul>	<p><i>Project size</i></p> <ul style="list-style-type: none"> <li>Geographic span of projects and communities that the project affects (e.g., larger projects intersect with more communities and are harder to monitor)</li> <li>Duration – longer term projects increase risk</li> </ul> <p><i>Project-affected population</i></p> <ul style="list-style-type: none"> <li>Small host community, unable to absorb large influx of workers</li> </ul>	<p><i>Project workers</i></p> <ul style="list-style-type: none"> <li>Not local</li> <li>Lack of sanctions for inappropriate behavior from employer</li> <li>Increase in income of workers amplifies power imbalance between workers and communities, and male workers and women and girls</li> <li>Increase in income enables transactional sex</li> </ul>	<p><i>Working with only men or women in a household</i></p> <ul style="list-style-type: none"> <li>Non-egalitarian decision-making</li> <li>Alcohol use</li> <li>Economic stress</li> <li>Not conforming to gender role expectations</li> <li>Opposition to departure from social norms about gender roles</li> </ul>	<p><i>Lack of information on how to report project-induced grievances</i></p> <ul style="list-style-type: none"> <li>Being a woman or a girl</li> <li>Being a sexual or gender minority</li> <li>Being part of an ethnic or racial minority group</li> <li>Age</li> <li>Disability</li> </ul>

<sup>24</sup> The ecological framework for understanding GBV is fully presented in the 2017 GBV Task Force Report, and in the [Violence Against Women and Girls Resource Guide introduction](#).

<ul style="list-style-type: none"> <li>• Legal barriers and/or weak implementation of laws providing women access to and control over productive resources, such as land</li> <li>• Higher rates of child marriage</li> <li>• Gender norms that perpetuate inequality between women/girls and men/boys</li> <li>• Fragile, conflict, or post-conflict setting</li> <li>• Conditions of forced displacement</li> <li>• Poverty</li> </ul>	<ul style="list-style-type: none"> <li>• Lack of information on how to report project grievances</li> <li>• Rural host community lacking access to services and institutions, low capacity for absorption</li> <li>• Unequal participation of community members in community consultations</li> <li>• Social isolation of women, girls, and family</li> <li>• Tolerance of harsh physical punishment of children</li> <li>• Male right to discipline and control female behavior</li> <li>• Acceptability of sexual relationships with adolescent girls and children</li> </ul>	<p>and exploitative relationships</p> <ul style="list-style-type: none"> <li>• Work carried out in remote areas or under limited supervision</li> </ul>		<ul style="list-style-type: none"> <li>• Language and level of educational attainment</li> <li>• Low social support, lack of networks</li> <li>• Lack of sufficient personal income</li> </ul>
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33. Children are on the whole more vulnerable to harm and violence than adults. This is because they hold less power, may be less visible, are more dependent on others for survival, or are marginalized. Boys and girls may experience different levels of risk and different risk factors in different settings, but in general girls experience higher risk of SEA than boys.<sup>25</sup> A risk assessment must therefore take into account risk factors relevant to children in the specific setting.

34. All World Bank-financed IPF involving major civil works currently under preparation should assess the risks that they may have related to SEA/SH and identify and implement prevention and mitigation measures to address those risks. There are two considerations:

- **Project-related SEA/SH Risk Assessment:** assessment of the risk of exacerbation/introduction of SEA or SH at the community level; and
- **Capacity Assessment:** assessment of the local capacity of formal systems to prevent and respond to GBV, including SEA/SH, and the availability of safe and ethical service provision for survivors, especially children.

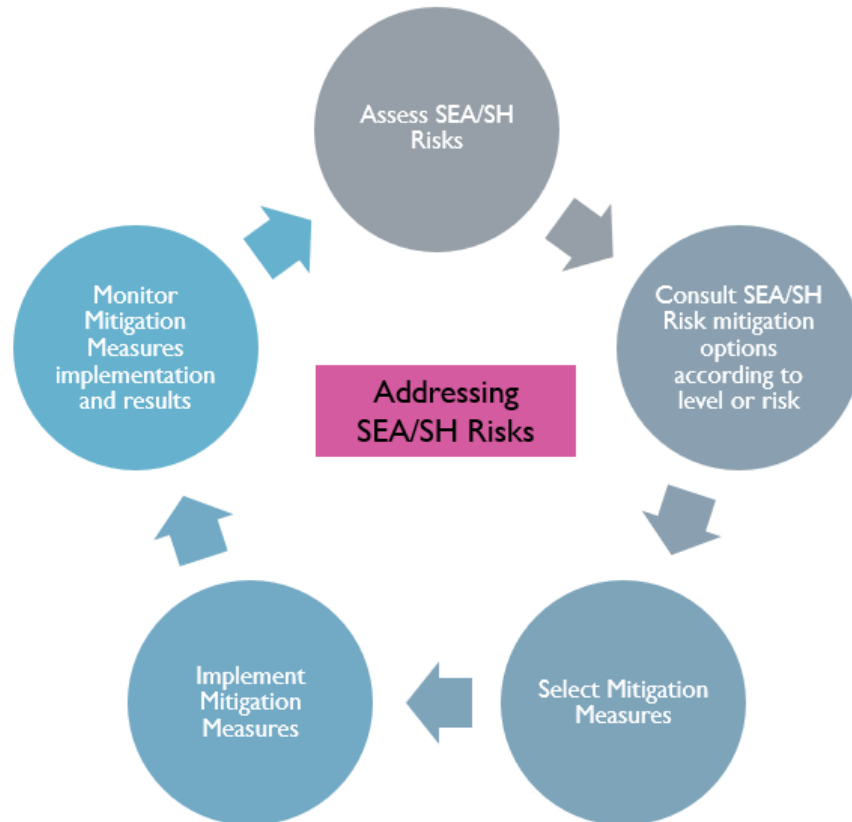
35. Assessing the project-related risk of exacerbating SEA/SH involves two essential issues. First, the country and/or regional context in which the project takes place, and second, the potential risks that

<sup>25</sup> Ligiero, et. al. 2019, What Works to Prevent Sexual Violence Against Children: Evidence Review, p. 13, available at <https://www.togetherforgirls.org/wp-content/uploads/2019-11-15-What-Works-to-Prevent-Sexual-Violence-Against-Children-Evidence-Review.pdf>.



the project may bring. These SEA/SH risks need to be assessed throughout the project’s life by monitoring the situation, assessing the effectiveness of risk mitigation measures, and adapting them accordingly (see **Figure 4**). When continuous monitoring efforts detect changes to the identified SEA/SH risks and/or actual incidences of SEA/SH, projects will need to adapt the SEA/SH risk level and mitigation strategy. Additional guidance helpful for continuously monitoring SEA/SH risk can be found under the “[Integrate](#)” tab of the “Violence Against Women and Girls Resource Guide” and in each accompanying sectoral brief.

**Figure 4: SEA/SH Risk Management Throughout Project Life Cycle**



## Risk Assessment

36. The assessment of SEA/SH risk has to be undertaken by the client, assisted by the World Bank Task Team through its due diligence. For the client, the assessment of SEA/SH risks of a project is normally undertaken as part of project preparation, particularly during community consultations. For the Task Team, risk screening should be done through the World Bank’s SEA/SH Risk Assessment Tool. Both processes are detailed below.
37. When considering SEA/SH risks, there are different “areas of impact” that influence both the nature of the risk and the appropriate prevention and mitigation measures that a project can implement:

- The **project site** is the location where the project’s activities are being undertaken. This includes both the actual locations where civil works are conducted, and also the associated areas such as the locations of workers’ camps, quarries, etc.
- The area of impact beyond the project site includes **communities adjoining the project**. This extends beyond the specific location where civil works are being carried out. These communities are at risk of SEA/SH, particularly when workers are highly mobile.
- There are also **regional and national** areas of impact that will not be affected by the specific interventions of a project but may benefit through institutional strengthening and other efforts to address SEA/SH risks. An assessment at the regional and/or national level can give clients and Task Teams an understanding of those experiencing GBV in the region or country, as well as the type and scale of violence, and its acceptability, in the communities where World Bank-financed projects are implemented. For example, the less equality between men and women and the more violence against women and girls, the more likely it is that the project will inadvertently reinforce these situations if it does not proactively acknowledge and seek to mitigate this risk.

38. In most cases, the necessary information on the prevalence of GBV at the national level is already available. Clients and Task Teams should rely on existing studies and research to guide their decision-making. Creating **baseline GBV surveys for the purpose of risk assessment should be avoided**. As discussed in Annex 2, extreme care needs to be taken when considering the collection of information on SEA/SH to assess risks.

39. Fragile or conflict-affected environments need to be carefully considered when assessing SEA/SH risks for a project. In such environments, communities may have undergone traumatic experiences and the social fabric may be broken down. Children in the community may experience multiple forms of vulnerability, such as being orphaned or unaccompanied, being the head of a household, experiencing forced displacement or disability. Further, as a result of insecurity and conflict, the required support services and care are often limited. There may be a lack of security for communities and rampant impunity for crimes committed. Supervision of projects in such areas is difficult and, in some instances, requires reinforced security arrangements. Contractors may need to recruit police, peacekeepers or military personnel for security; however, these forces may not be subject to the national legal system but have their own internal judicial mechanisms that may either not have adequate enforcement, or not specifically prohibit GBV, especially SEA/SH. The combination of these factors can significantly increase the risk for SEA/SH and should be carefully considered in project preparation and implementation.

### *World Bank SEA/SH Risk Screening Tool*

40. A tool for Task Teams to screen the project SEA/SH risk has been developed by the World Bank and can be found [online](#).<sup>26</sup> This SEA/SH Risk Screening Tool helps Task Teams understand the issues and

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<sup>26</sup> The World Bank Sexual Exploitation & Abuse/Sexual Harassment Risk Screening Tool, available to Bank staff at: <https://radweb.worldbank.org/gendersea/home>

risks of SEA/SH in the project areas. It takes into consideration both project-specific details, such as labor influx levels, as well as the country context<sup>27</sup> where the project takes place—such as situations of conflict. Through 25 questions, 12 to be answered by the Task Team and 13 that are prepopulated, the tool gives each project a risk “score” based on the responses to the questions. The questions are meant only as a starting point and are not intended to be exhaustive. As multiple forms of GBV have the same risk factors and drivers, the tool can be used to understand the overall context and how the project may interact with this context in relation to multiple forms of GBV, not just SEA/SH.

41. The risk score is calculated on a scale of 0 to 25. Projects that score 0-12.25 are considered “**Low**” risk; 12.5-16 “**Moderate**” risk; 16.25-18 “**Substantial**” risk, and 18.25-25 “**High**” risk.
42. The SEA/SH Risk Screening Tool is designed to be applied at the outset of a new project. It is recommended that the SEA/SH risk rating be included in the Project Concept Note (PCN) for consideration at the PCN review meeting. On the basis of additional information gathered during project preparation, the risk should be updated as appropriate for the Quality Enhancement Review (QER) meeting or at the Decision Review meeting.
43. As with any tool, there may be situations where it is prudent to adopt a higher risk category than the tool suggests, if local conditions warrant. It should be emphasized that estimating SEA/SH risk is not an exact science. The tool is meant to help launch the Task Team on a path to understanding how the proposed project may have SEA/SH-related impacts. The tool is periodically monitored for its usefulness and accuracy for rating SEA/SH risk. For more information on the tool, refer to Annex 3.

### *Client-led SEA/SH Risk Assessment*

#### **Stakeholder Engagement**

44. As described in ESS10, stakeholder engagement is an inclusive process conducted throughout the project life cycle and is important for managing the project’s risks. Stakeholders<sup>28</sup> in the communities adjoining the project need to understand project risks and benefits. Projects are required to develop a Stakeholder Engagement Plan (SEP) to be implemented over the life cycle of the project to keep these communities and other stakeholders informed about the project, and to enable ongoing engagement with and feedback from these communities. For Substantial and High risk projects, the SEP is recommended to include SEA/SH-specific considerations for how to appropriately conduct consultations (see below).
45. Children are also stakeholders and their viewpoints on the risks and impacts of a project should be included. However, consulting directly with children on SEA/SH issues as part of stakeholder consultations or other assessments is strongly discouraged. It is recommended to consult instead with adults representing organizations that work for and with children and that represent the interests and

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<sup>27</sup> Country context considerations are already populated automatically and require no additional input.

<sup>28</sup> The stakeholders of a project will vary depending on the details of the project. They may include local communities, national and local authorities, neighboring projects, and NGOs.

rights of children. In the very rare cases where such consultations may be justified or particularly important (i.e. when children are primary project beneficiaries or clearly affected by the project), projects are recommended to resource support for highly qualified people with significant training and experience consulting with children to allow for their safe participation. Such engagement may include outreach to youth-led organizations, clubs, or adolescent groups where these are active.

46. Technology can facilitate continual communication and exchange with communities, particularly to track perceptions of SEA/SH risk as linked to a project. It can also be an asset in assisting the community with access to services and updated information related to GBV. Refer to the note on Grievance Mechanisms (GMs) for SEA/SH, including child friendly procedures for SEA against children, in World Bank-financed projects<sup>29</sup> for further information on technology and how it is currently being used in some World Bank operations to monitor SEA/SH risks.
47. Stakeholder guidance should be sought to identify existing and potential local SEA/SH risks, and stakeholders should be consulted on potential interventions and risk mitigation measures. Consultations with women leaders and those working with adolescent girls and boys and other at-risk groups should be prioritized to enable understanding of SEA/SH risks and trends in the community.
48. Task Teams should carefully monitor that effective and inclusive community consultations are undertaken. The consultations are generally organized by the implementing agency (IA)<sup>30</sup> with the support of the supervising engineer's E&S specialists. If the project's needs are substantial, then an independent consultant to support the IA with consultations may be a more effective approach. **These consultations are needed throughout the life cycle of the project, not only during preparation.**
49. To understand recommendations pertaining to safe and ethical GBV consultations, see the [Ethics](#) section of the [Violence Against Women and Girls Resource Guide](#). Stakeholder consultations **should never directly ask about individual experiences of GBV**. Rather, they should focus on gaining an understanding of the experiences of women and girls in affected communities, including wellbeing, health and safety concerns. If any consultations are to take place with children, they must be carried out by a person trained in child consultations, with an understanding of local culture and customs. Before commencing with consultation, teams should be prepared with information related to those providing services to survivors in a community so anyone who discloses violence can be immediately referred. Taking into account these safety and ethical principles can prevent inadvertently causing harm when consulting with community members. Key considerations for the consultation process (see ESS10 for further details) are:
  - Identify the communities adjoining the project and plan stakeholder consultations on this basis.

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<sup>29</sup> See [Grievance Mechanisms for Sexual Exploitation and Abuse & Sexual Harassment in World Bank-financed Projects](#).

<sup>30</sup> Clients should consider hiring a GBV specialist to undertake consultations and key informant interviews related to GBV. This will ensure appropriate methodology and adherence to global safety and ethical standards.

- Undertake consultations in accordance with ESS10. Community consultations should be conducted so that those affected by the project are properly informed and can provide their feedback on project design and E&S issues.
- Ensure consultation activities provide opportunities to share information with stakeholders on project-related risks and the proposed reporting and response measures, with a particular focus on women, children and other at-risk groups—each of which may require different approaches to enable a safe space for discussion. Recognizing the gender power and social dynamics within a community and how they may inhibit participation, it is key to ensure that spaces are made available for women, men and children affected by the project to participate in consultations. It is important that the stakeholders be aware, at a minimum, of:
  - The purpose, nature and scale of the project;
  - The duration of the proposed project activities;
  - Potential risks to and impacts on local communities, and related to SEA/SH:
    - The labor influx implications;
    - The environmental, social, health and safety (ESHS) and SEA/SH risks that may be associated with the project;
    - The employer’s (i.e., Government) ESHS policy as required in the World Bank’s SPDs;
    - The CoC standards to be used in the project (e.g., from the SPDs), with clear communication on what constitutes a violation and how a violation can be reported; and
    - Who the local GBV service providers are, how to contact them, and the support services offered;
  - The proposed stakeholder engagement process and how stakeholders can provide feedback on the project; and
  - The channels available to lodge complaints through the Grievance Mechanism (GM) and how they will be addressed.

50. It is also recommended that the IA and environmental and social (E&S) consultant consult with local organizations, women’s groups, nongovernmental organizations (NGOs) and relevant multilateral or UN agencies to:

- Understand the types of GBV that are present in the community and that may be exacerbated by the project; including identification of groups or individuals most vulnerable to harm; where women and girls feel most unsafe; how the community currently deals with GBV allegations; and why SEA/SH may be introduced or exacerbated by the project;
- Map services and safe spaces available to survivors of GBV, including child friendly services and spaces where GBV and SEA/SH is currently reported<sup>31</sup> – this includes specific places where children can safely report;

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<sup>31</sup> See [Grievance Mechanisms for Sexual Exploitation and Abuse & Sexual Harassment in World Bank-financed Projects](#).

- Identify measures to mitigate project risks.
- During SEA/SH risk assessment activities, the IA and E&S consultant should make no attempt to contact survivors of any form of GBV or question them about any GBV incident.<sup>32</sup> However, those carrying out consultations should be familiar with protocols for what to do in case a participant discloses a GBV incident, including any mandatory reporting obligations.

### Environmental and Social Documents

51. The **Environmental and Social Assessment (ESA)** identifies potential environmental and social impacts early on in project preparation and is usually the primary vehicle for assessing SEA/SH risks on an IPF involving major civil works. The Borrower carries out an ESA of the project to assess its environmental and social risks throughout the project life cycle. In areas of Substantial and High risk of SEA, as determined by the SEA/SH Risk Assessment Tool, the ESA should pay particular attention to identifying SEA/SH risks. The consultants undertaking the ESA for such projects should ideally include a GBV specialist with expertise on children, so that SEA/SH challenges, including those that particularly affect children, can be properly assessed, and prevention and mitigation measures, proposed.<sup>33</sup>

52. For ESAs to capture the socioeconomic, cultural and risk context for SEA/SH, they should consider:

- Existing gender country diagnostics/country action plans;
- Information on GBV and violence against children, including mandatory reporting requirements;
- Data on partner/non-partner physical violence against women<sup>34</sup>, and violence against children;
- Data and/or information for harmful practices vis-à-vis women and girls (early marriage, female genital mutilation);
- Identifying existing services available from GBV service providers including child-friendly services and identifying services that are mandated under national law to determine the best

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<sup>32</sup> See: (i) [Violence Against Women and Girls Resource Guide](#) Ethics page, <https://www.worldbank.org/en/programs/violence-against-women-and-girls/ethics>; (ii) Ellsberg, M., and L. Heise. 2005. *Researching Violence Against Women: A Practical Guide for Researchers and Activists*. Washington DC, United States: World Health Organization, PATH, available at: [http://whqlibdoc.who.int/publications/2005/9241546476\\_eng.pdf?ua=1](http://whqlibdoc.who.int/publications/2005/9241546476_eng.pdf?ua=1); (iii) World Health Organization, 2001, *Putting women first: Ethical and safety recommendations for research on domestic violence against women*, available at: <https://apps.who.int/iris/handle/10665/65893>; and (iv) World Health Organization, 2007, *WHO Ethical and safety recommendations for researching, documenting and monitoring sexual violence in emergencies*, available at: <https://www.who.int/publications/i/item/9789241595681>.

<sup>33</sup> A [list of vetted GBV specialists](#) can be found under the “Resources” tab in the SEA/SH Risk Screening Tool page.

<sup>34</sup> These data are available in many Demographic and Health Surveys and are summarized as part of the Gender Sustainable Development Goals. The data exist for over 90 countries. See UN Women’s [Global Database on Violence against Women](#).

interests of children by conducting Best Interest Assessment (BIA), and/or Best Interest Determination (BID)<sup>35</sup>;

- Where health centers are located and what types of services are offered (e.g., whether they treat sexually transmitted diseases, provide reproductive health services, have supplies of rape kits including post-exposure prophylactics and emergency contraception, etc.);
- Whether women and girls have easy access to these services, and if they have mobility and/or economic constraints that may impede access; and
- Information obtained from consultations carried out in the preparation of the project.

53. Environmental and Social Assessments should explore the country’s **mandatory reporting requirements related to SEA/SH incidents**. Some countries or states have legislation that requires individuals or designated individuals (such as health care providers) to report cases of sexual violence to the police or legal system. In many countries mandatory reporting relates primarily to abuse of children and maltreatment of minors but in others it has been extended to reporting intimate partner violence or to all forms of sexual violence. Research on sexual violence has raised concerns about the impacts of mandatory reporting on survivors’ rights, autonomy, and self-determination.<sup>36</sup> However, the Borrower, implementing agencies, and GBV service providers should be aware of and abide by any legal obligations to refer SEA/SH incidents for criminal prosecution. These requirements may differ depending on the country, legal context, and institution. When relevant, building on the results of the E&S Assessment, GM procedures should outline how mandatory policies will be enacted, and how information will be provided to survivors prior to disclosure of any GBV case.

54. A robust methodology for social risk assessment and analysis can help identify critical markers to address project-related risk. Tools such as key informant interviews, observations, free listing, pair-wise ranking, timelines and seasonal calendars, causal flow analysis and open-ended stories have all been used in the field of GBV research. For more information on how to apply these tools safely and

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<sup>35</sup> Best Interest Assessment refers to an assessment of a child’s best interests conducted by organizations with required expertise and requires the participation of the child. It can take various forms and may not necessarily be called a “best interest assessment”. An assessment of children’s best interest is also often required within national systems, and the factors to be taken into account may be set out in legislation. Best Interest Determination describes the formal UNHCR process, which has strict procedural safeguards designed to determine the child’s best interests when taking particularly important decisions affecting the child. It should facilitate adequate child participation without discrimination, involve decision-makers with relevant areas of expertise and balance all relevant factors in order to assess and determine the best option. 2021 UNHCR, Best Interest Procedures Guidelines: Assessing and Determining the best interest of the child, Definitions and Explanations of key terms, Page 9. And 10.

<sup>36</sup> For further information and a summary of relevant research, see World Health Organization, 2013: Responding to intimate partner violence and sexual violence against women: WHO clinical and policy guidelines, p. vii, available at: [https://apps.who.int/iris/bitstream/handle/10665/85240/9789241548595\\_eng.pdf](https://apps.who.int/iris/bitstream/handle/10665/85240/9789241548595_eng.pdf).

ethically see Chapter 9 of the manual: *Researching Violence Against Women: A Practical Guide for Researchers and Activists*.<sup>37</sup>

55. It is vital that the ESA adequately identify SEA/SH risks. The project **Environmental and Social Management Plan (ESMP)** will then define the specific ways that SEA/SH risks are to be addressed in the project by identifying prevention and mitigation measures, including the development of a SEA/SH Action Plan. The ESMP is usually included as part of the tender package and thereby forms part of the construction contract, with the contractor using the project ESMP to create the contractor's ESMP (C-ESMP).<sup>38</sup> Annex 4 provides recommendations on the C-ESMP and describes the project ESMP and the C-ESMP in relation to SEA/SH.
56. The project ESMP lays the first building block for addressing SEA/SH risks and should provide the appropriate umbrella framework for any proposed SEA/SH prevention and mitigation measures, particularly those proposed in this GPN.
57. Project-level measures to address SEA/SH risks should consider other ongoing efforts to prevent and respond to GBV more broadly, including ongoing efforts to prevent sexual and physical violence against children, and how the project will complement/use them. Project SEA/SH prevention interventions should be linked wherever possible with existing activities in the health sector, and other GBV service providers, such as justice/security, psychosocial support and economic empowerment programming.

### SEA/SH Action Plan and Accountability and Response Framework

58. For the project's SEA/SH risks to be properly addressed, it is recommended to have an effective "SEA/SH Action Plan," which outlines:
- How the project will put in place the necessary protocols and mechanisms to address the SEA/SH risks; and
  - How to address any SEA/SH allegations that may arise.
59. A SEA/SH Action Plan is recommended for Moderate, Substantial and High risk projects but the activities outlined in the Action Plan will vary in accordance with the level of risk: the higher the risk, the more the Action Plan will need to address. It must be emphasized that the Action Plan elements need to be customized for each project, taking into account local labor legislation, mandatory reporting requirements regarding GBV, as well as sexual violence against children, child maltreatment, and industrial agreements (see Annex 1).

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<sup>37</sup> An adequate methodology to employ in risk assessments is: Ellsberg M, and L. Heise. 2005. *Researching Violence Against Women: A Practical Guide for Researchers and Activists*. Washington DC, United States: World Health Organization, PATH, available at: [http://whqlibdoc.who.int/publications/2005/9241546476\\_eng.pdf?ua=1](http://whqlibdoc.who.int/publications/2005/9241546476_eng.pdf?ua=1).

<sup>38</sup> The relevant provisions of the ESMP should be included in the contract specifications so that the contractor is clear about what is required, it can be costed and included in the contract, as this ensures that the requirements are put forward in a manner that contractors can understand and implement.



60. The IA is responsible for producing the SEA/SH Action Plan. As outlined above, the project ESMP lays the first building blocks for addressing SEA/SH risks and should provide the basis of the Action Plan. The Action Plan is finalized with input from the contractor. For instance, the proposed approach on how to implement and monitor the Action Plan, including agreed sanctions pursuant to an Accountability and Response Framework (see below), should be provided by the contractor and consultants as part of the C-ESMP.
61. The Action Plan needs to include specific **arrangements** for the project by which SEA/SH risks will be addressed. This includes considerations such as:
- Awareness raising strategy, which describes (i) how workers and local communities will be sensitized to SEA/SH risks, including elements to reach children and their guardians, and (ii) the worker’s responsibilities under the CoC;
  - How the project will provide information to employees and the community on how to report cases of SEA/SH, in violation of the CoC, to the GM;
  - The GM process for notifying the contractor of allegations;
  - GBV service providers to which GBV survivors, including SEA/SH survivors, will be referred, and the services which will be available. This should include specific services appropriate for and catering to child survivors of GBV; and
  - Plans to coordinate with others working on GBV and SEA/SH in country, including agencies or organizations that work on child safeguarding and protection.
62. The SEA/SH Action Plan should include or provide for preparation of an **Accountability and Response Framework** which details how allegations of SEA/SH will be handled (investigation procedures) and disciplinary action for violation of the CoC by workers. The Accountability and Response Framework should include at minimum:
- How allegations will be handled, in what timeframe, and the range of possible disciplinary actions for violation of the CoC by workers, taking account of due process;
  - Procedures to report SEA/SH allegations internally for case accountability;
  - Protocols on responding to survivors, applying the survivor-centered approach, including a referral pathway to refer survivors to appropriate support services;
  - Procedures that clearly lay out confidentiality requirements for dealing with cases;
  - Specific provisions to address allegations involving children who are survivors of SEA/SH, including the consideration of the best interests of the child, specialist support services, and the role of parents/guardians in the response process;
  - Protocols to comply with mandatory reporting requirements, if applicable under national law, including to inform survivors (ideally prior to disclosure) of this obligation and any limits on confidentiality (see para 93 below);

- Procedures for review of complaints or incident reports, including information on the investigation and verification process and related information-sharing and reporting requirements; and
- Protocols for protection of whistleblowers and prohibition on retaliation against survivors, consistent with the World Bank’s Commitments on Reprisals.<sup>39</sup>

63. While the SEA/SH Prevention and Response Action Plan is recommended for Moderate, Substantial and High risk projects, the Accountability and Response Framework is recommended for all projects. The World Bank’s SPDs for large civil works procured under ICB require that all contractors Personnel are provided with (and acknowledge receipt of) a CoC, so it is important that each project has an Accountability and Response Framework, detailing how allegations of violation of the CoC will be handled. In circumstances where an Action Plan is not required for a project, the Framework may be developed as a separate document in conjunction with the CoC.

64. **It is essential** that any disciplinary action for violation of the CoC by workers be determined and carried out in a manner that is consistent with local labor legislation and applicable industrial agreements, otherwise there is a risk that the CoC will not be implemented effectively. It is important to note that disciplinary sanctions in each case are intended to be part of a process that is entirely internal to the employer, is placed under the full control and responsibility of its managers and is conducted in accordance with the applicable national labor legislation and the individual worker’s employment contract. The proposed sanctions must be in line with local law as the latter may prohibit certain types of disciplinary measures, including termination of the employee.

65. The supervising Engineer should monitor and report on the effectiveness of the implementation of the SEA/SH Action Plan to mitigate SEA/SH risks associated with the project. Reporting should be done on a monthly basis (see more on Reporting in **Table 3: Proposed Reporting of SEA/SH During Implementation**).

### Assessing Capacity to Respond to SEA/SH

66. An adequate response to SEA/SH depends on the ability of the project to provide access to safe and ethical services for survivors. GBV service provider(s) and/or community-based organizations are critical not only for supporting the project in addressing any case of SEA/SH that may arise, but also in assisting the project to proactively prevent incidences of SEA/SH.

67. Chapter 5 and Annex 5 provide recommendations on how to identify and work with GBV service providers. Where appropriate, in Substantial and High risk projects, teams should verify that the GBV service provider selected can offer services in accordance with [international standards that articulate a minimum basic package of services](#), ideally including case management support, health services,

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<sup>39</sup> See World Bank, March 2020 “World Bank Commitments Against Reprisals,” <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/world-bank-commitments-against-reprisals>.

psychosocial support, police support and security, access to legal services, and shelter, if needed.<sup>40</sup> When identifying GBV service providers, the quality of service provision should be a key consideration.<sup>41</sup> This includes assessment of the availability of child-friendly services and protocols that take into consideration child survivors' needs. To maximize access to all appropriate services a survivor might need, a service provider should be able to actively refer survivors to other service providers, to enable the survivor to get the range of services that will provide a path to healing. In the majority of cases, service providers offer one or two services, but not the whole range of applicable services. Documentation on how referrals should be made is often denoted as a referral pathway.

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<sup>40</sup> For more information on services needed by GBV survivors, see: <http://www.vawgresourceguide.org/overview>

<sup>41</sup> Quality standards for medical care can be found in WHO, 2014, Health Care for Women Subjected to Intimate Partner Violence or Sexual Violence: a clinical handbook, available at: <https://apps.who.int/iris/handle/10665/136101>. Other service standards can be found in UN Women, Essential Services Package for Women and Girls Subject to Violence, 2015, available at: <https://www.unwomen.org/en/digital-library/publications/2015/12/essential-services-package-for-women-and-girls-subject-to-violence>; and UNFPA, 2015, Minimum Standards for Prevention and Response to Gender-Based Violence in Emergencies, available at: <https://www.unfpa.org/sites/default/files/pub-pdf/GBVIE.Minimum.Standards.Publication.FINAL.ENG.pdf>.

## 4. Addressing SEA/SH Risks

### SEA/SH Risk Mitigation and Response Measures

68. Once Task Teams have assessed and established the level of SEA/SH risk as described in Chapter 3, they will need to work with the Borrower to consider a series of prevention and mitigation measures to address and monitor these risks throughout the life cycle of the project. These prevention and mitigation measures are put in place by the Borrower.
69. Table 2 provides a summary of actions proposed to mitigate SEA/SH risks, based on the risk and the phase of preparation or implementation of the project. **The level of effort associated with the mitigation measures in Table 2 will usually vary by risk.** For example, the design of the GM may vary according to the SEA/SH risk.
70. For projects that do not use loan/credit/grant proceeds to hire GBV service providers at the start of project implementation, it is recommended that Borrowers include an escalation clause in the Environmental & Social Commitment Plan (ESCP) should SEA/SH risks become apparent over the course of project implementation. Borrowers might commit, for example, to hire (additional) GBV service providers using loan/credit/grant proceeds should the incidence of SEA/SH create a need for additional support.
71. Sample TORs, CoCs, SEA/SH Prevention and Response Action Plans and other materials to support implementing the recommendations are available through GBV Focal Points, and on the WBG GBV intranet page:

<https://worldbankgroup.sharepoint.com/sites/WBGender/sitepages/publishingpages/information-about-sexual-exploitation-abuse-and-harassment-in-world-bank-operations-03172021-112450.aspx>

**Table 2: Recommended Actions to Address Project-Induced SEA/SH Risks**

☑ = Actions are recommended given the risk level; ○ = Actions that should be considered to be done, and adopted if appropriate, given the nature of the project and the associated risks; ⊗ = Actions are unlikely needed given risk level

When	Action to Address SEA/SH Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by SEA/SH Risk Level			
					Low	Moderate	Substantial	High
Identification/Appraisal	Sensitize the IA as to the importance of addressing SEA/SH in the project, and the mechanisms that will be implemented.	<ul style="list-style-type: none"> <li>○ Preparation.</li> <li>○ Implementation.</li> </ul>	<ul style="list-style-type: none"> <li>○ Task Team.</li> </ul>	<ul style="list-style-type: none"> <li>○ Task team to monitor and provide additional guidance as necessary.</li> </ul>	☑	☑	☑	☑
	Include in the <b>project’s social assessment</b> an assessment of the underlying and project induced SEA/SH risks, including risks to children and social situation, using the SEA/SH Risk Assessment Tool to provide guidance and keeping to safety and ethical considerations related to GBV data collection. No prevalence data or baseline data should be collected as part of risk assessments.	<ul style="list-style-type: none"> <li>○ Preparation.</li> <li>○ Implementation (before civil works commence).</li> <li>○ PCN and QER/Decision Review (SEA/SH Risk Assessment Tool).</li> </ul>	<ul style="list-style-type: none"> <li>○ IA for social assessment and ESMP.</li> <li>○ Contractor for C-ESMP.</li> <li>○ Task Team for SEA/SH Risk Assessment Tool.</li> </ul>	<ul style="list-style-type: none"> <li>○ Ongoing review during implementation support missions.</li> <li>○ Update project ESMP and C-ESMP if risk situation changes.</li> </ul>	☑	☑	☑	☑

When	Action to Address SEA/SH Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by SEA/SH Risk Level			
					Low	Moderate	Substantial	High
	<p><b>Map out</b> GBV prevention and response actors in communities adjoining the project.<sup>42</sup> This should incorporate an assessment of the capabilities of the service providers to provide quality survivor-centered services, including GBV case management, acting as a victim advocate, providing referral services to link to other services not provided by the organization itself. This should include an assessment of the capacities of the service providers to provide child-friendly services, and to implement appropriate procedure to determine the best interests of child survivors.</p>	<ul style="list-style-type: none"> <li>○ Preparation.</li> <li>○ Implementation.</li> </ul>	<ul style="list-style-type: none"> <li>○ IA</li> </ul>	<ul style="list-style-type: none"> <li>○ Update mapping as appropriate.</li> </ul>	✓	✓	✓	✓
	<p>Are SEA/SH risks adequately reflected in all <b>E&amp;S project documentation</b> (i.e., Project ESMP, C-ESMP)? Include the GBV service provider mapping in these instruments.</p>	<ul style="list-style-type: none"> <li>○ Preparation.</li> <li>○ Implementation (before civil works commence).</li> </ul>	<ul style="list-style-type: none"> <li>○ IA for social assessment and ESMP.</li> <li>○ Contractor for C-ESMP.</li> </ul>	<ul style="list-style-type: none"> <li>○ Ongoing review during implementation support missions. Update project ESMP and C-ESMP if risk situation changes.</li> </ul>	✓	✓	✓	✓

<sup>42</sup> A mapping exercise of GBV prevention and response actors should ideally be undertaken at a country level and shared with all Task Teams, including consulting with inter-agency networks on child protection and GBV

When	Action to Address SEA/SH Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by SEA/SH Risk Level			
					Low	Moderate	Substantial	High
	Develop a <b>SEA/SH Action Plan</b> including an <b>Accountability and Response Framework</b> as part of the ESMP, including specific provisions for children. The contractor/consultant’s response to these requirements will be required to be reflected in the C-ESMP.	<ul style="list-style-type: none"> <li>○ Preparation.</li> <li>○ Implementation (before civil works commence).</li> </ul>	<ul style="list-style-type: none"> <li>○ IA</li> </ul>	<ul style="list-style-type: none"> <li>○ Ongoing review during implementation.</li> </ul>	✗	✓	✓	✓
	Review the <b>IA’s capacity</b> to prevent and respond to SEA/SH, including their ability to adequately respond to child survivors needs, as part of <b>safeguard preparation</b> .	<ul style="list-style-type: none"> <li>○ Preparation.</li> <li>○ Implementation.</li> </ul>	<ul style="list-style-type: none"> <li>○ Task Team</li> </ul>	<ul style="list-style-type: none"> <li>○ Ongoing review during implementation support missions. Update project ESMP if risk situation changes.</li> </ul>	✓	✓	✓	✓
	As part of the <b>project’s stakeholder consultations, properly inform those affected by the project of SEA/SH risks</b> and project activities to get their feedback on project design and E&S issues. Consultations need to engage with a variety of stakeholders (political, cultural or religious leaders, health teams, local councils, social workers, women’s organizations and groups working with children) and should occur at the start and throughout the implementation of the project.	<ul style="list-style-type: none"> <li>○ Consultations need to be throughout the project cycle, not just during preparation.</li> </ul>	<ul style="list-style-type: none"> <li>○ IA.</li> </ul>	<ul style="list-style-type: none"> <li>○ Monitoring of implementation of SEP.</li> <li>○ Ongoing consultations, particularly when C-ESMP is updated.</li> </ul>	✓	✓	✓	✓

When	Action to Address SEA/SH Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by SEA/SH Risk Level			
					Low	Moderate	Substantial	High
	Specifically address SEA/SH-related issues <b>in the SEP</b> of the project, which will be implemented over the life of the project to keep the local communities and other stakeholders informed about the project’s activities.	○ Consultations need to be throughout the project cycle, not just during preparation.	○ IA.	○ Monitoring of implementation of SEP. ○ Ongoing consultations, particularly when C-ESMP is updated.	○	○	✓	✓
	Make certain of the availability of an <b>effective GM</b> with multiple channels to initiate a complaint. It should have specific procedures for SEA/SH, including confidential reporting with safe and ethical documenting of SEA/SH cases. It should outline procedures for receiving reports on SEA/SH against children. Parallel GM outside of the project GM may be warranted for substantial to high risk situations.	○ Prior to contractor mobilizing.	○ IA, but discussed and agreed upon with the Task Team.	○ Ongoing monitoring and reporting on GM to verify it is working as intended.	✓	✓	✓	✓
	Ensure <b>IA has a GBV specialist</b> to support project implementation.	○ Preparation.	○ IA.	○ Ongoing reporting.	⊗	○	✓	✓



When	Action to Address SEA/SH Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by SEA/SH Risk Level			
					Low	Moderate	Substantial	High
	For <b>supervision</b> , have a <b>social /environmental specialist</b> in the supervising Engineer’s team with <b>GBV (including against children) specific</b> skills to supervise issues related to SEA/SH (e.g. supervise signing of CoCs, verify working GM for SEA/SH is in place, refer cases where needed) and work with GBV service providers as entry points into service provision to raise awareness of the GM.	○ During procurement evaluation process.	○ IA.	○ Ongoing reporting.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	<b>Ensure oversight</b> through an independent <b>Third Party Monitoring (TPM) organization/Independent Verification Agent (IVA)</b> (civil society organization, international or local NGO, academic partner, private sector firm) <b>with experienced GBV (including against children) staff</b> to monitor implementation of the SEA/SH Prevention and Response Action Plan and ensure all parties are meeting their responsibilities.	○ Preparation.	○ IA.	○ Ongoing reporting.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

When	Action to Address SEA/SH Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by SEA/SH Risk Level			
					Low	Moderate	Substantial	High
	Ensure funding is available for IA to recruit GBV service providers to facilitate access to timely, safe and confidential services for survivors (including money for transportation, documentation fees, and lodging if needed).	○ Preparation	○ IA.	○ IA.				
	For projects that do not use loan/credit/grant proceeds to hire GBV service providers at the start of project implementation, encourage Borrowers to include an escalation clause in the general contract terms and the ESCP should SEA/SH risks become apparent over the course of the project implementation.	○ Preparation.	○ Task Team.	○ Task Team.				
Procurement	Clearly define the SEA/SH requirements and expectations in the <b>bid documents</b> .	○ Procurement.	○ IA.	○ Review by Task Team.				
	Based on the project’s needs, the Bank’s SPDs, and the IA’s policies and goals, define the requirements to be included in the bidding documents for a <b>CoC which addresses SEA/SH</b> .	○ Procurement.	○ IA.	○ Review by Task Team.				

When	Action to Address SEA/SH Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by SEA/SH Risk Level			
					Low	Moderate	Substantial	High
	For <b>National Competitive Bidding (NCB) procurement</b> , consider integrating the International Competitive Bidding (ICB) SPD requirements for addressing SEA/SH risks.	○ Procurement.	○ IA.	○ IA with review by Task Team.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	Set out clearly in the procurement documents how adequate SEA/SH-related costs will be paid for in the contract. This could be, for example, by including: (i) line items in bill of quantities for clearly defined SEA/SH activities (such as preparation of relevant plans) or (ii) specified provisional sums for activities that cannot be defined in advance (such as for implementation of relevant plan/s, engaging GBV service providers, if necessary).	○ Procurement.	○ IA.	○ Review by Task Team.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	Clearly explain and define the requirements of the bidders' <b>CoC</b> to bidders before submission of the bids.	○ Procurement.	○ IA.	○ Review by Task Team.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

When	Action to Address SEA/SH Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by SEA/SH Risk Level			
					Low	Moderate	Substantial	High
	<b>Evaluate the contractor’s SEA/SH Accountability and Response Framework</b> in the C-ESMP and confirm prior to finalizing the contract the contractor’s ability to meet the project’s SEA/SH prevention and response requirements.	○ Procurement.	○ IA.	○ Review by Task Team.	⊗	✓	✓	✓
Implementation	<b>Review C-ESMP</b> to verify that appropriate mitigation actions are included.	○ Implementation.	○ IA.	○ Review by IA. ○ Review by Task Team.	✓	✓	✓	✓
	<b>Review the GM’s reception and processing of complaints</b> to ensure that the protocols are being followed in a timely manner, referring complaints to an established mechanism to review and address SEA/SH complaints.	○ Implementation.	○ Task Team. ○ IA.	○ Ongoing reporting. ○ Monitoring of complaints and their resolution.	✓	✓	✓	✓

When	Action to Address SEA/SH Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by SEA/SH Risk Level			
					Low	Moderate	Substantial	High
	<p><b>Codes of Conduct signed and understood</b></p> <ul style="list-style-type: none"> <li>○ Ensure requirements in CoCs are clearly understood by those signing.</li> <li>○ Have CoCs signed by all those with a physical presence at the project site.</li> <li>○ Train project staff on the behavior obligations under the CoCs.</li> <li>○ Disseminate CoCs (including visual illustrations) and discuss with employees and local communities.</li> <li>○ Create an appropriate Accountability and Response Framework.</li> </ul>	○ Initiated prior to contractor mobilization and continued during implementation.	○ Contractor, Consultant, IA.	<ul style="list-style-type: none"> <li>○ Review of SEA/SH risks during project supervision (e.g., Mid-term Review) to assess any changes in risk.</li> <li>○ Supervising Engineer reporting that CoCs are signed and that workers have been trained and understand their obligations.<sup>43</sup></li> <li>○ Monitoring of GM for SEA/SH complaints.</li> <li>○ Discussion at public consultations.</li> </ul>	✓	✓	✓	✓
	Have project workers and local community undergo <b>training</b> on SEA/SH.	○ Implementation.	○ IA, Contractors, Consultants.	○ Ongoing reporting.	✓	✓	✓	✓
	Undertake regular <b>M&amp;E</b> of progress on SEA/SH prevention and response activities, including reassessment of risks as appropriate.	○ Implementation.	○ IA, Contractors, Consultants.	<ul style="list-style-type: none"> <li>○ Monitoring of GM.</li> <li>○ Ongoing reporting.</li> </ul>	✓	✓	✓	✓

<sup>43</sup> Civil works supervising Engineer’s monthly reports should confirm all persons with physical presence at the project site have signed a CoC and been trained.

When	Action to Address SEA/SH Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by SEA/SH Risk Level			
					Low	Moderate	Substantial	High
	<p>Implement appropriate <b>project-level activities</b> to reduce SEA/SH risks prior to civil works commencing such as:</p> <ul style="list-style-type: none"> <li>○ <b>Have separate, safe and easily accessible facilities for women and men working on the site.</b> Locker rooms and/or latrines should be located in separate areas, well-lit and include the ability to be locked from the inside.</li> <li>○ <b>Visibly display signs around the project site</b> (if applicable) that signal to workers and the community that the project site is an area where SEA/SH is prohibited.</li> <li>○ As appropriate, ensure public spaces around the project grounds are <b>well-lit</b>.</li> </ul>	<ul style="list-style-type: none"> <li>○ Prior to works commencing.</li> </ul>	<ul style="list-style-type: none"> <li>○ Contractor (implementation)</li> <li>○ Supervising Engineer (supervising/enforcing contract)</li> <li>○ Task Team.</li> </ul>	<ul style="list-style-type: none"> <li>○ Ongoing reporting.</li> <li>○ Reviews during implementation support missions.</li> </ul>	○	✓	✓	✓

## Addressing SEA/SH risks through the Procurement Process

72. Embedding SEA/SH requirements in procurement processes is a critical mechanism to ensure legal accountability for addressing SEA/SH in projects. Recent revisions to World Bank procurement requirements have strengthened measures to address SEA/SH risks in World Bank-financed operations. SPDs and Standard Bidding Documents (SBDs), which the Borrower agrees to apply for international competitive procurement, provide the basis for ensuring that contractors and consultants fulfil their GBV obligations. The requirements to comply are enshrined in the covenants of the Financing Agreement.<sup>44</sup>

### *Bidding (Procurement) Documents*

73. It is important that the bidding documents sufficiently reflect the findings of any ESA, and the requirements of the ESMP, to address SEA/SH and overall ESHS risks. The Bank's SPDs and SBDs (works-related and for supervising Engineers) provide the framework and contain explanations and notes for including SEA/SH provisions in the procurement documents, through, among others, appropriate specifications in the employer's requirements/TOR.

74. It is essential that the Task Teams ensure that the bidding documents clearly define the project's SEA/SH requirements through the specifications and employer's requirements. Key considerations include:

- The bidding documents to be used are recommended to be reviewed to confirm that potential risks of SEA/SH are adequately addressed given the nature of the project. This is particularly important when it is anticipated that:
  - The project will result in major labor influx; or
  - National Competitive Bidding (NCB) will be used but the country's NCB documents do not adequately address SEA/SH and ESHS risks.
- As part of the decision to use National Procurement Procedures, an assessment of the national procurement documents should be undertaken to establish how and where provisions in respect to SEA/SH should be included. The Task Team (including procurement, E&S specialists) should work with the Borrower to identify the best mechanism for incorporating the necessary requirements. Should this process prove to be impractical for the project (e.g., requires lengthy clearances by multiple levels of authorities), an alternative

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<sup>44</sup> The Recipient shall ensure that all the bidding documents and contracts for works or non-consulting services under the Project require that the contractor, sub-contractor or consultant adopt a code of conduct that shall be provided to and signed by all workers, as applicable to such works or non-consulting services commissioned or carried out pursuant to said contracts, which shall, inter alia, cover gender-based violence, violence against children and sexual exploitation and abuse, along with an action plan designed to effectively implement said code of conduct, including appropriate training on said code of conduct.

interim approach would be to have the Borrower adopt a minimum CoC for all bidders to follow, which reflects the necessary ESHS and SEA/SH requirements.

- High risk projects are recommended to include the requirement that bidders submit not only a CoC, but also a Labor Influx Management Plan for the proper management of the workers on the project.
- Specifications (ideally) and/or the Particular Conditions to the Contract should be used to adequately address SEA/SH risks and more broadly improve ESHS performance.
- The project ESMP and other E&S documents should fully describe the SEA/SH risk (including a SEA/SH Prevention and Response Action Plan), and more broadly the ESHS expectations, and include appropriate prevention and mitigation measures. This should be incorporated into the specifications.
- As described in further detail in the SPD (Works SPD PCC 4.1), the contract will include a requirement that the contractor shall not carry out any works, including mobilization and/or pre-construction, unless the supervising Engineer is satisfied that appropriate measures are in place to address environmental and social, risks and impacts (as defined in the SBD). At a minimum, the contractor shall be required to apply the Management Strategies and Implementation Plans and CoC, submitted as part of the bid and agreed as part of the contract.

75. Careful consideration needs to be given to how the costs for the contractor to implement the SEA/SH requirements will be treated in the bid, evaluated, and paid as such. The project budget should be realistic about these costs. One option to consider is the use of a provisional sum which would cover the contractor's reasonable costs of implementing the SEA/SH Prevention and Response Action Plan. The advantage of this approach is that all bidders would have a consistent level of funding in their bids, neutralizing the implications of underpricing or overpricing.

### *During Bidding*

76. It is essential to draw the attention of bidders to the specific SEA/SH requirements of the project. This can be done for example through market engagement (during the development of the Project Procurement Strategy for Development), use of clarifications, and/or during any pre-bid meetings. Details on how to do this are provided in the SPDs and the Procurement Guidance - Environmental, Social, Health and Safety in Procurement. It is recommended to be as clear as possible regarding the form and nature of the known SEA/SH risks during this process, as well as the measures that bidders will need to take. The key information to provide bidders includes:

- The ESMP requirements, particularly with regard to ESHS expectations, and SEA/SH requirements (including a response to the SEA/SH Prevention and Response Action Plan);



- That civil works will not commence until the C-ESMP has been approved by the IA or the supervising Engineer;<sup>45</sup> and
- That the C-ESMP—including the SEA/SH Prevention and Response Action Plan—may be disclosed on the IA’s web site,<sup>46</sup> and that the contractor should participate in public consultations at its own expense.

### *Bid Evaluation*

77. The specifications or ESMP in bidding documents must include the requirements to respond to particular SEA/SH risks or predicted impacts. As part of the contractor’s Social Management Plan, which should be submitted with the bid, the following details should be included:

- The contractor’s proposed approach to implementing the SEA/SH Prevention and Response Action Plan including the Accountability and Response Framework (in response to the requirements outlined in the ESMP);
- The contractor’s Codes of Conduct; and
- Other activities to address the SEA/SH risks of the project (e.g., Labor Influx Management Plan).

78. This information is to be assessed by the Borrower as part of the bid’s responsiveness. Where deviations or omissions are not assessed to be material—which would lead to the bid being rejected—the Borrower may request the bidder to provide clarifications and/or additional information, for further evaluation.

79. In procurement processes that include rated criteria or a points system, SEA/SH requirements may be part of the proposal scoring system. Where this is used, the Task Team should ensure that the requirements are specific and clear, and that the allocation of points relative to other factors is balanced.

80. Bidders are required to submit a declaration of whether they have had a contract terminated, suspended or a performance security called for reasons relating to past poor performance on ESHS issues. The declaration includes details of the reasons. If it is established that the cause is due to SEA/SH, due diligence should be carried out by the IA to determine whether bidders have learned

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<sup>45</sup> For complicated or lengthy projects, it may be acceptable to have a “phased” C-ESMP. This means the C-ESMP would be approved in phases, reflecting the order in which civil works are done. For example, if a five-year project to construct an expressway only has asphalt paving in year four, then there is no need to have the asphalt plant’s environmental requirements included in the initial C-ESMP, which would instead focus on initial activities such as project mobilization and earthworks.

<sup>46</sup> This is not a World Bank requirement, but experience has shown that it is beneficial to the project engaging local communities as it allows them to be well informed of the specific project construction activities which may affect them. While ESMPs are disclosed through the World Bank’s external website, C-ESMPs should not be disclosed through the external website as they do not require a World Bank “no objection.” Their disclosure is recommended only to be on the IA’s website.

from past experience and how they have modified or implemented management controls to prevent recurrence. In the absence of the bidder demonstrating appropriate controls to prevent recurrence, the Task Team should review the IA's assessment and recommendation on next steps and consult with the IA as necessary as to how to ensure appropriate controls are in place.

## Codes of Conduct

81. Since 2017, the World Bank's SPDs for large works have required that all contractors Personnel are provided with (and acknowledge receipt of) a CoC. A CoC clarifies an organization's mission, values and principles, linking them with standards of professional conduct.<sup>47</sup> The CoC articulates the values the organization wishes to foster in leaders and employees and, in doing so, defines desired behavior. As a result, a written CoC can become a benchmark against which individual and organizational performance can be measured. **The SPD requirements for CoCs include provisions for addressing SEA/SH and include prohibitions against sexual activity with anyone under the age of 18. Mistaken belief regarding the age of the child and consent is not a defense for engaging in sexual activity with minors.**
82. As noted earlier, the CoC is associated with a SEA/SH Prevention and Response Action Plan, which includes an Accountability and Response Framework. The Framework outlines how complaints will be handled, in what timeframe, and the range of possible consequences for perpetrators of SEA/SH so that the CoC can be implemented effectively.
83. The SPDs provide a sample CoC (see Annex 1) as guidance on the minimum content of issues to be addressed in the CoC. Bidders are also required to describe the implementation arrangements for the CoC. As noted in Annex 1, some projects in low-capacity environments have worked with IAs to develop the IA's CoC, which is used as the minimum standard acceptable from bidders in their submissions. This IA CoC may be used by bidders should they not have one of their own. Sample CoCs from multiple organizations from around the world are available from GBV Focal Points. These may be used as reference documents when CoCs are being prepared by IAs or contractors' CoCs are being evaluated.
84. A key element of the CoC is the sanctions that may be applied if an employee is confirmed as a SEA/SH perpetrator. The sanctions need to be proportional to the violation. Prior to imposition of sanctions, if a worker raises a credible challenge to alleged violation with the CoC, the worker's employer should place the worker on administrative leave pending a full and fair review to determine the veracity of said allegation(s). Examples of potential sanctions include the following:
  - Informal warning;
  - Formal warning;
  - Additional training;
  - Loss of up to one week's salary;

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<sup>47</sup> Ethics and Compliance Initiative (ECI) Website, 2022, "Developing an Organizational Code of Conduct" available at: <http://www.ethics.org/resources/free-toolkit/code-of-conduct>

- Suspension of employment (either administrative leave as above or without payment of salary), for a minimum period of one month up to a maximum of six months;
- Termination of employment; and/or,
- Referral to the police or other authorities as warranted.

## Contractor’s ESMP

85. As noted in Chapter 3, the client’s E&S documents should identify the risk of SEA/SH and propose prevention and mitigation measures—particularly through the project ESMP. The project **ESMP is usually the foundation for the C-ESMP**, which is the plan prepared by the contractor outlining specifically how it will implement the civil works activities in accordance with the project ESMP’s requirements and with the contract.<sup>48</sup> The C-ESMP, therefore, is a fundamental instrument for ensuring oversight and management of SEA/SH risks.
86. Annex 4 shows how an effective C-ESMP is essential for addressing SEA/SH risks during implementation. Contractually, the contractor must follow the C-ESMP, which is why it is important that the C-ESMP build upon the findings and proposed measures identified in the project’s ESA and ESMP. In the rare instance that an IPF involving major civil works lacks an ESMP or C-ESMP, an alternative modality would need to be found.
87. Public disclosure and consultations on the C-ESMP—particularly with regard to SEA/SH risk mitigation—is beneficial (but not mandatory) as it ensures that local communities are aware of the specific actions proposed to address the risks. The works contract should require the contractor to participate in the consultations at its own expense, since they are related to the project works.

## SEA/SH Training for Contractors, Consultants and Clients

88. To properly address SEA/SH, the training and sensitizing of workers is essential. These workers include civil works contractors (including sub-contractors and suppliers and their workers), supervising Engineers, consultants who may have a presence in the communities adjoining the project—as well as the IAs. Projects can seek to embed training modules that incorporate SEA/SH into the regular Occupational Health and Safety “toolbox” meetings with workers, official training and/or standalone training efforts. Partnering with health and education sector professionals may be beneficial in developing the curriculum.
89. Training on SEA/SH should be thorough and proportional to the SEA/SH risk. The modality, frequency and content of the training should be detailed in the SEA/SH Prevention and Response Action Plan. At a minimum, training should include:
- What SEA/SH is and how the project can exacerbate SEA/SH risks;

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<sup>48</sup> As part of the bid, the contractor submits management strategies, implementation plans, and a CoC. The contractor also submits, on a continuing basis, for the supervising Engineer’s prior approval, such supplementary management strategies and implementation plans as are necessary to manage the ESHS risks and impacts of ongoing works. These management strategies and implementation plans collectively comprise the C-ESMP.

- Specific risks to women, children, and other contextually relevant groups;
- Standards of conduct for project staff and acts prohibited by the project CoC, including the prohibition on sexual activity with people under the age of 18 as a condition for employment;
- SEA/SH allegation reporting mechanism, accountability structures, and referral procedures within agencies and for community members to report cases related to project staff;
- Services available for survivors of SEA/SH and GBV; and
- Follow-up activities to reinforce training content.

90. Training and awareness raising is a strong step toward behavior change. As projects are implemented, training on SEA/SH should be made available to the communities adjoining the project so they can learn about the roles and responsibilities of actors involved in the project, processes for reporting allegations of SEA/SH, mandatory reporting requirements (where relevant), and the corresponding accountability structures. Training of both the communities adjoining the project and project implementers allows all stakeholders to understand the risks of SEA/SH, as well as appropriate mitigation and response measures, putting everyone on the same page.

91. Training IAs will also help them to better understand the potential for SEA/SH that a project may induce. An example of training conducted by the World Bank with clients in Uganda, as well as other recommendations on training and examples from several projects, can be found in Annex 7.

## Grievance Mechanisms

92. All World Bank-financed IPFs are required to have a GM. To properly address SEA/SH risks, the GM needs to be in place prior to contractors mobilizing. While many projects have traditionally only considered GM in the context of resettlement, the World Bank's ESF requires that IPF have a grievance mechanism that will be "proportionate to the potential risks and impacts of the project".<sup>49</sup> This is **meant to apply to all aspects of the project**.<sup>50</sup> Any parallel GMs operated by contractors and consultants should include processes to refer complaints to the project GM so as to ensure that an accurate understanding of the project's complaints is always available.

93. For GBV—and particularly SEA/SH—complaints, there are risks of stigmatization, rejection and reprisals against survivors. This creates and reinforces a culture of silence so survivors may be reticent to approach the project directly. Some survivors will choose to seek services directly and never report to the GM, which may lead to a discrepancy in the number of cases reported to the Bank by service providers and the GM operators. To enable women to safely access the GM, multiple channels through which complaints can be registered in a safe and confidential manner can be enabled. Specific GM considerations for addressing SEA/SH are:

- The GM is usually operated by the IA, or the project management unit (PMU) on the IA's behalf. When there are Substantial or High SEA/SH risk projects, consideration should be

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<sup>49</sup> ESS10, para 27.

<sup>50</sup> ESS10 notes that the same GM can be used for land acquisition and resettlement (ESS5) and Indigenous Peoples (ESS7), but recommends a separate one for project workers under ESS2.

given to a separate SEA/SH GM system, potentially operated by a GBV service provider—with feedback to the project GM similar to that for parallel GMs operated by contractors and consultants. A separate note on GMs for SEA/SH in World Bank-financed projects provides additional discussion on the pros and cons of addressing SEA/SH through the overall project GM system as opposed to an independent parallel SEA/SH GM. The GM operators are to be trained on how to receive and document SEA/SH cases confidentially and empathetically (with no judgement). See Annex 2 for further details.

- In some areas where other agencies are actively mitigating and responding to SEA/SH inter-agency SEA/SH reporting channels may exist. Evaluating the feasibility of leveraging and strengthening existing SEA/SH reporting channels is part of the participatory process of identifying the most appropriate complaint entry point(s).
- Because of the best interest of the child principles, GMs will need to have specific provisions for responding to cases involving children and GM operators will need to be trained on how to respond to such cases, regardless of whether the child or a third party lodges the complaint. Where possible, GM operators should place an emphasis on establishing a positive dialogue with guardians and caregivers of children who have experienced SEA, with the objective of seeking the best interests of the child.
- Before the survivor reports a complaint about SEA/SH to the project GM, the survivor should be made aware if there is any mandatory reporting requirement that would apply – i.e. any obligation under national law for the GM operator, or the project, to report certain incidents. When there is no legal obligation to report the case according to local law, survivors should always make the decision of whether to report cases the authorities, including after having received advice on their rights and legal options as part of the referral to minimum, holistic care. Whenever possible, reporting to the police should be done exclusively with the survivor’s consent.<sup>51</sup>
- Projects must have multiple complaint channels, and these must be trusted by those who need to use them. Community consultations may be one mechanism to identify effective channels (e.g., local community organizations, health providers, etc.).
- No identifiable information on the survivor should be stored in the GM.
- The GM should **not** ask for, or record, information on *more than the following* related to the SEA/SH allegation:
  - The nature of the complaint (what the complainant says in her/his own words without direct questioning);

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<sup>51</sup> For further guidance on how GM procedures can reconcile mandatory reporting requirements and the survivor-centered approach, please consult a GBV specialist or a regional GBV Focal Point. Further guidance can be found in the Interagency Gender-Based Violence Case Management Guidelines, 2017, Section 2.2.2, available at: <https://reliefweb.int/report/world/interagency-gender-based-violence-case-management-guidelines>

- If, to the best of the survivor’s knowledge, the perpetrator was associated with the project;
  - If possible, the age and sex of the survivor; and
  - If possible, information on whether the survivor was referred to services.
- The GM should assist SEA/SH survivors by referring them to GBV service provider(s) for support immediately after receiving a complaint directly from a survivor. This should be possible because a list of service providers would already be available before project work commences as part of the mapping exercise (see Table 2).
  - The information in the GM must be confidential—especially when related to the identity of the complainant. For SEA/SH, the GM should primarily serve to: (i) **refer** complainants to the GBV service provider; and (ii) **record** resolution of the complaint (see Chapter 5).
94. **Data Sharing:** The GBV service provider should have its own case management process to gather the necessary detailed data to support the complainant and facilitate resolution of the case referred by the GM operator. The GBV service provider should enter into an information-sharing protocol with the GM operator to close the case. This information should not go beyond the resolution of the incident, the date the incident was resolved, and the closing of the case, as described in Chapter 5. Service providers are under no obligation to provide case data to anyone without the survivor’s consent. If the survivor consents to case data being shared the service provider can share information when and if doing so is safe, meaning the sharing of data will not put the survivor or service provider at risk of experiencing more violence. For more information on GBV data sharing see: <http://www.gbvims.com/gbvims-tools/isp/>.
95. The costs of operating the GM are usually modest and should be financed by the project as part of the general project management costs.<sup>52</sup>
96. The GM should have in place processes to immediately notify both the IA and the World Bank of any SEA/SH complaints, with the consent of the survivor. For World Bank reporting protocol refer to the Environmental and Social Incident Response Toolkit (ESIRT), described in Chapter 5.

## Monitoring and Reporting

97. It is essential that the project monitor SEA/SH prevention activities. M&E plays a key role in assessing the effectiveness of prevention and mitigation measures. As part of the M&E process, indicators need to be selected for inclusion in the project Results Framework.

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<sup>52</sup> The operation of the GM does not include the cost of resolving SEA/SH complaints (e.g., survivor support services), which, depending on the risk level and the mechanism in place, may be more costly.

### Results Framework Indicators

98. The project’s Results Framework should include indicators related to: (i) the SEA/SH prevention activities on the project; and (ii) the GM.

99. SEA/SH prevention indicators may include:

- Successful implementation of agreed SEA/SH Prevention and Response Action Plan (Y/N);
- Number of training courses related to SEA/SH delivered;
- Percentage of workers that have signed a CoC; and/or
- Percentage of workers that have attended CoC training.

100. **GM indicators:** A GM indicator that is useful to monitor is the time it took to resolve the SEA/SH-related complaint.

### Reporting During Implementation

101. Projects have a significant role to play in supporting safe spaces for women and children to report their experiences of violence. It should be noted that an increase in the number of reported cases does not necessarily mean that SEA/SH incidents have increased; it can also reflect improved mechanisms for safe and confidential reporting and increased interest in accessing GBV support services. Table 3 proposes the reporting mechanisms for SEA/SH prevention monitoring. It should be emphasized that no reporting should have identifiable information on individual cases. It is essential that the confidentiality and safety of survivors be protected.

**Table 3: Proposed Reporting of SEA/SH During Implementation**

Who	To Whom	What	When	Objective
<b>GM Operator</b>	IA (and IA to furnish to Bank)	<ul style="list-style-type: none"> <li>• Reporting of SEA/SH allegations with four key data:                             <ul style="list-style-type: none"> <li>○ Nature of the case;</li> <li>○ Project-related (Y/N); and</li> <li>○ Age and/or sex (if available).</li> <li>○ Whether the survivor was referred to services.</li> </ul> </li> </ul>	As soon as becomes known	<p>For IA to monitor response.</p> <p>For Bank to report to management in accordance with ESIRT (see Chapter 5).</p>
<b>GBV Service Provider (contracted to project)</b>	IA and supervising engineer	<p>Aggregate data on case load:</p> <ul style="list-style-type: none"> <li>• Number of SEA/SH cases received/referred by the GM, disaggregated by age and by sex;</li> <li>• The number of cases open, and the average time they have been open; and</li> <li>• The number of cases closed, and the average time they were open.</li> </ul>	Monthly	To ensure accountability of GBV service provider particularly if financial support is being provided for survivor support.
<b>Supervising Engineer</b>	IA	<ul style="list-style-type: none"> <li>• Status on the implementation of project’s SEA/SH Prevention and Response Action Plan;</li> <li>• The agreed project SEA/SH indicators, e.g.:                             <ul style="list-style-type: none"> <li>○ Successful implementation of agreed SEA/SH Prevention and Response Action Plan (Y/N);</li> </ul> </li> </ul>	Monthly	Part of overall supervising Engineer’s duty to monitor day-to-day activities and implementation of project’s CoC.

		<ul style="list-style-type: none"> <li>○ Number of training courses related to SEA/SH delivered;</li> <li>○ Percentage of workers that have signed a CoC; and/or</li> <li>○ Percentage of workers that have attended CoC training;</li> <li>● That the GM is functioning correctly for receiving and resolving complaints;</li> <li>● The GM indicators; and</li> <li>● That an appropriate mechanism to resolve SEA/SH complaints is established and functional.</li> </ul>		
<b>Implementing Agency</b>	Bank	<ul style="list-style-type: none"> <li>● Project SEA/SH indicators; and</li> <li>● GM indicators (as supplied by the supervising Engineer)</li> </ul>	In accordance with project legal agreements	In accordance with the standard project Results Framework reporting.
<b>TPM/IVA (if applicable)</b>	IA (and IA to furnish to Bank)	<ul style="list-style-type: none"> <li>● The implementation of the SEA/SH Prevention and Response Action Plan;</li> <li>● The functioning of an appropriate mechanism to address and resolve SEA/SH complaints;</li> <li>● The functioning of the GBV service provider; and</li> <li>● The functioning of the GM and the status of GM indicators related to SEA/SH.</li> </ul>	Quarterly	Part of overall duty of TPM/IVA to monitor implementation of the CoC.

102. **Aide Memoires:** Aide Memoires should include the data provided by the IA through the supervising Engineer as well as any information from the TPM/IVA.

103. **Implementation Status Reports (ISRs):** The ISRs should include updates on the status of the SEA/SH prevention activities on the project, as well as to the indicators in the Results Framework.

### Stakeholder Engagement

104. As noted in Chapter 3, consultations with people in the communities adjoining the project **need to occur throughout the life cycle of the project**. These regular consultations should provide opportunities to share information with communities on project-related risks and reporting and response measures, and to identify any issues that may be arising with regard to SEA/SH. This means the consultations should have a particular focus on women, children and other at-risk groups—each of which may require different approaches to enable age- and gender-appropriate content and a safe space for discussion.

### Supervision and Oversight

105. Contractors on civil works projects are typically supervised by a consulting firm on behalf of the IA. A key challenge faced by many projects is that the supervision and oversight of SEA/SH prevention

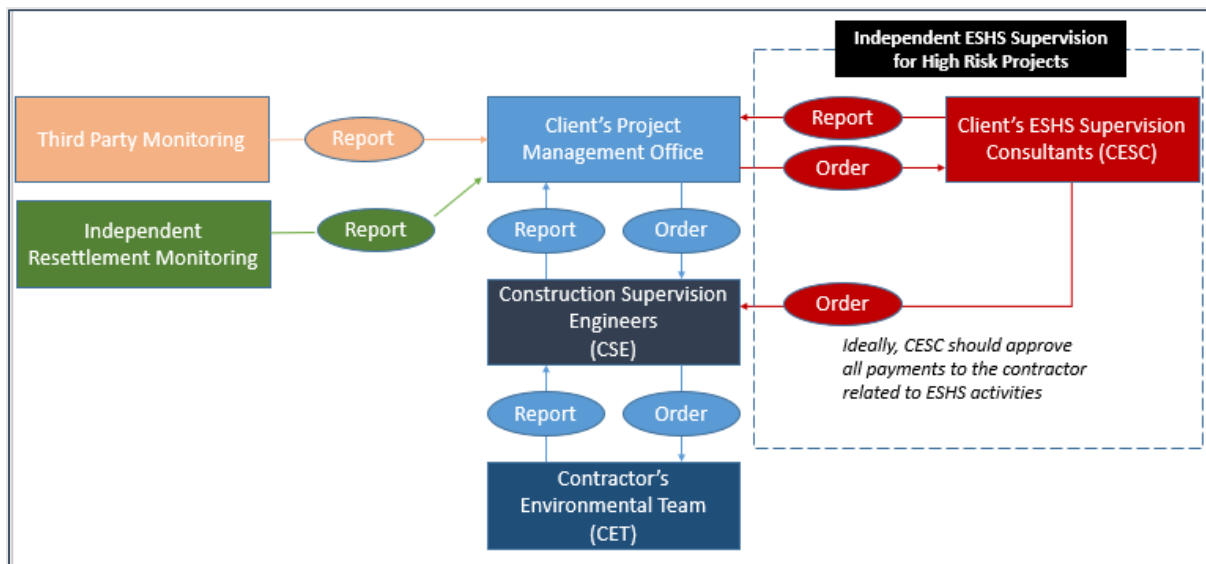


activities during civil works is inadequate. This section outlines activities that can be incorporated into the project to make supervision and oversight more proactive.

### Supervision Modalities

106. Effective supervision and oversight of the project’s SEA/SH prevention efforts are vital and should therefore be carefully considered during project preparation. As shown in **Figure 5**, effective oversight requires various actors: additional actors are needed in high/substantial risk projects. All entities involved—supervising Engineer, the IA, any independent oversight entities, as well as other entities such as steering committees and civil society—must have clear roles and responsibilities throughout the implementation of the project. All those involved in SEA/SH prevention activities should have appropriate training and skills for the tasks assigned to them.

**Figure 5: Supervision and Oversight Options for High Risk Projects, Based on China Hubei Yiba Highway Project**



### Supervising Engineer

107. The TOR for the supervising Engineer need to clearly outline the expectations of their role in ensuring that SEA/SH risks and prevention and mitigation measures are properly reflected in the C-ESMP and are implemented. It is critical that the supervising Engineer has appropriately qualified social and environmental specialists. In addition, for Moderate, Substantial and High risk projects, the consultants need to demonstrate that they have the appropriate capacity to take on SEA/SH-related responsibilities, such as supervising the signing of CoC, verifying that a working GM for SEA/SH is in place so that referral of SEA/SH cases can be made when needed, and working with GBV service providers and entry points into service provision (as required) to raise awareness of the GM. They also have a role in the resolution of SEA/SH complaints made to the GM, not only for the project but also for ensuring any sanctions on their own staff are applied.

108. For projects with Substantial and High risk of SEA/SH, it is prudent to require quarterly inspections to monitor the implementation of SEA/SH prevention and mitigation measures. It is recommended that the inspections include: (i) the supervising Engineer, who is the one tasked with day-to-day oversight of the contractor; (ii) the supervising Engineer’s GBV specialist; and (iii) the IA’s GBV specialist. The presence of the IA’s GBV specialist—who may be the project’s social specialist—will support the supervising Engineer in assessing whether the necessary SEA/SH standards have been followed. It will also provide the Borrower with an opportunity to verify that the relevant reports adequately reflect the actual situation with regard to mitigating SEA/SH risks.

### *Implementing Agency Staffing*

109. It is recommended that the IA have appropriate environmental and social specialists available. Without them, it will be very difficult to manage the project’s ESHS risks—especially related to SEA/SH. For projects at Substantial or High risk of SEA/SH, it is recommended for the IA to have a GBV specialist as part of the E&S team to ensure SEA/SH-related activities and services are being delivered according to global quality and ethical guidelines.

### *Independent Monitoring of SEA/SH*

110. If there is a high risk of SEA/SH in a project, **independent third-party SEA/SH monitoring (TPM) is recommended**. The TPM or IVA is an organization commissioned to independently monitor and report on the effectiveness of the SEA/SH Prevention and Response Action Plan implementation to prevent and mitigate SEA/SH risks associated with the project.<sup>53</sup> The role of the TPM/IVA **is not to track, investigate or follow up on individual cases of SEA/SH**. The TPM/IVA has a higher-level oversight function to confirm that all project actors, including the GBV service provider and the designated focal points or committee to address and resolve SEA/SH complaints, are implementing the SEA/SH Prevention and Response Action Plan. The TPM/IVA verifies that the provisions to prevent and respond to SEA/SH are in place and functioning, and also can provide early warning of problems that may surface.
111. The selection of the TPM/IVA should be based on the project context, scope and reality on the ground and may be a civil society organization, international or local NGO, academic partner, private sector firm or dispute board mechanism. The TPM/IVA will be required to have experience in GBV so that part of the monitoring can be used to evaluate the quality of the actions undertaken. It should provide regular reports (minimum quarterly) directly to the IA, who should remit them to the Task Team.
112. The TPM/IVA plays a key role, especially in High risk projects in monitoring: (i) the measures put in place and implementation of said measures by contractors; (ii) the functioning of GMs; and (ii) the successful functioning of the referral pathways and service provision that have been contracted out (in most cases to specialized NGOs). In order to ensure that the TPM/IVA can independently carry

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<sup>53</sup> TPM typically involves verification of outputs by an entity paid from a source of funding that is external to the project whereas IVA play a similar verification role but can be contracted using project funding. Many refer to IVA as TPM, including the 2017 GBV Task Force Report.

out the above aspects of implementation, it would be preferable that the TPM/IVA role be fulfilled by organizations (including NGOs) other than those that are responsible for service provision – so as not to create a conflict of interest. However, in low-capacity or FCV situations where it may be difficult to find a separate entity to play the TPM/IVA role, a service provider, other than a government entity, could also potentially play the TPM/IVA role, provided measures are put in place to minimize potential conflicts of interest.

## 5. Responding to SEA/SH allegations

### A Survivor-Centered Approach

113. Global best practice recognizes that it is essential to respond appropriately to a survivor's complaint by respecting the survivor's choices. This means that the survivor's rights, needs and wishes are prioritized in every decision related to the incident. The survivor of SEA/SH, who has the courage to come forward, must always be treated with dignity and respect. Every effort should be made to protect the safety and wellbeing of the survivor and any action should always be taken with the survivor's consent. These steps serve to minimize the potential for re-traumatization and further violence against the survivor. In SEA/SH cases involving children, the survivor-centered approach is guided by an age- and gender-sensitive assessment of the best interests of the child.
114. **Confidentiality** is essential throughout the process. Otherwise, the survivor risks retaliation and a loss of security.
115. If the alleged perpetrator is an employee of the contractor, consultant or IA, to protect the safety of the survivor, and the workplace in general, the IA, contractor or consultant should assess the risk of ongoing abuse to the survivor and in the workplace. This should be done in consultation with the survivor and with the support of the GBV service provider. Reasonable adjustments should be made to the alleged perpetrator's or survivor's work schedule and work environment—preferably by moving the perpetrator rather than the survivor—as deemed necessary. The employer should provide adequate leave to survivors seeking services after experiencing violence.
116. Service providers have the responsibility to uphold children's best interests throughout the support they provide to children including case management, which includes promoting actions that are in the best interest and advocating with other service providers.<sup>54</sup> Close coordination with organizations working on GBV as well as organizations working on child protection is crucial when it comes to responding effectively to child victims of sexual exploitation and abuse. It is also important to ensure that children are referred to services that can cater to the age and development stage of that particular child.
117. Confidentiality protocols and decisions are less straightforward when working with children. Working with children, especially younger children, requires understanding the legal limits to confidentiality (including the existence of mandatory reporting laws and policies, the need to protect a child's physical and/or emotional safety or to provide immediate assistance, the need to inform a child's parent/caregiver in order to obtain permission to provide care and treatment to the child if there are no dangers in doing so) in terms of decisions pertaining to the case as well as

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<sup>54</sup> IRC and UNICEF, *Caring for Child Survivors of Sexual Abuse Guidelines, Case Management for Child Survivors*, page 98, available at: <https://www.unicef.org/documents/caring-child-survivors-sexual-abuse>.

referring the case. Children should be informed of what will happen to their case and why, and should be consulted as much as possible, depending on their age and developmental stage.<sup>55</sup>

## GBV Service Providers

118. As noted in Chapter 3 and Annex 5, one of the most effective ways of addressing SEA/SH risks and incidences lies in working with GBV service providers and community-based organizations that are able to support the project in addressing any case of SEA/SH, while also working to proactively prevent such cases.
119. **Identifying GBV Service Providers:** All projects are recommended to identify GBV services provider(s), including those with expertise to provide services to child survivors —prior to project appraisal—irrespective of the risk level. This is because SEA/SH allegations may arise on any project and it is necessary to have the appropriate response mechanisms in place. Mapping of GBV prevention and response actors in a given community may already exist, particularly in humanitarian settings. Where no or insufficient local knowledge on prevention and response service providers is available, ideally the Country Management Unit should undertake a mapping exercise through a portfolio approach that identifies qualified GBV service providers, interagency child protection networks and services, NGOs and community-based organizations in communities adjoining the project. Task Teams can also undertake the exercise if the Country Management Unit has not done so. In all cases, mapping of GBV service providers should be verified during project preparation as funding for GBV service provision is scarce and can shift rapidly. If no such organization exists in the project area, service providers from other areas (national or international) that meet international standards are recommended. Alternatively, if this is not possible, the Task Team, in consultation with the necessary GBV and/or health specialists, should evaluate whether there is a possibility in the project to finance a capacity development program to provide appropriate GBV support. This has to be carefully planned and considered.<sup>56</sup>
120. **Financing GBV Service Providers:** In High or Substantial risk projects in remote areas, where existing arrangements are not already in place to cover the costs of GBV service providers, it may be prudent to have the IA contract with one or more GBV service providers to provide specific services (typically using loan/credit/grant proceeds). This will make it easier to ensure that any survivors receive the necessary support. **No monetary compensation should be given directly to the survivor; all support services and accompanying transportation, housing and support requirements (money for official documentation or collection of forensic evidence) are paid through the service provider.**

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<sup>55</sup> IRC and UNICEF, *Caring for Child Survivors of Sexual Abuse Guidelines, Case Management for Child Survivors*, pgs. 95-96, available at: <https://www.unicef.org/documents/caring-child-survivors-sexual-abuse>

<sup>56</sup> An example of this is the Tuvalu Aviation Investment Project, where an activity was included under the third Additional Finance to establish support services for survivors of SEA/SH as such services were unavailable in Tuvalu. The Fiji Women's Crisis Centre undertook training and capacity building activities in this regard financed by the project.

121. If financed through the project, the GBV service provider should document the level of support given to a survivor, including referral to other service providers. Beyond unidentifiable aggregate key data points (e.g., number of cases received, nature of case and, if available, age and sex - see Table 3 for details), case data should never be requested of service providers. In the exceptional situation where service providers need to share any more details with an outside party, this must be with the permission of the survivor. The survivor must give consent to data sharing and know what data will be shared, with whom and for what purposes. For more information on GBV information sharing see: <http://www.gbvims.com/gbvims-tools/isp/>.
122. It is important that the GBV service providers understand their legal obligations, the legal limits of confidentiality, mandatory reporting requirements, as well as their professional codes of practice, particularly when it comes to reporting SEA/SH cases to the police. The World Health Organization (WHO) does not recommend mandatory reporting of GBV to the police<sup>57</sup> but if a country's legislation requires mandatory reporting, the GBV service provider should inform the IA and the potential survivor of this obligation, as well as of any other limits of confidentiality.

### Handling SEA/SH Complaints

123. All projects need to have a framework for properly handling SEA/SH allegations, which should be outlined in the Accountability and Response Framework (see Chapter 3). There are a few key actors involved in handling SEA/SH allegations: (i) the GM operator; (ii) the GBV service provider (iii) the representative of the IA (iv) and the employer of the alleged perpetrator. It is therefore essential that prior to SEA/SH complaints being received, all projects clearly identify who specifically will be responsible for handling the complaint: who will assess the nature of the complaint, the appropriate sanction to be applied to the perpetrator, confirmation that the survivor has received support, and that sanctions have been enacted, etc. Teams should note that existing modalities for reporting complaints may not be appropriate to enable reporting or to handle the sensitivities associated with SEA/SH. Teams may therefore need to identify alternate channels for reporting, such as the GBV service provider.
124. The IA should establish the Accountability and Response Framework for resolving SEA/SH cases. While the process for resolution and the people involved may vary, the key guiding principle for the resolution process should be to ensure the complete confidentiality of the survivor's case information, a survivor-centered approach, a fair assessment and due process for all those involved, a speedy resolution and application of the process outlined in the agreed-upon Accountability and Response Framework. Any person involved in the resolution process should be specifically trained<sup>58</sup>

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<sup>57</sup> For further information, see the World Health Organization, 2013, Responding to Intimate Partner Violence and Sexual Violence Against Women: WHO clinical and policy guidelines, [https://apps.who.int/iris/bitstream/handle/10665/85240/9789241548595\\_eng.pdf](https://apps.who.int/iris/bitstream/handle/10665/85240/9789241548595_eng.pdf)

<sup>58</sup> Some countries may require those involved in SEA/SH case assessment to be specifically trained and licensed, given that there will be an investigation of an accusation that could lead to a decision with consequences.

to address and resolve SEA/SH-related complaints and wherever possible a dedicated focal point from the GBV service provider should be part of the resolution process.

125. The process for addressing complaints would typically be along the following lines (see separate note on GMs for SEA/SH in World Bank-financed projects):

- The GM operator will keep SEA/SH allegation reports confidential and, unless the complaint was received through the GBV service provider or other identified reporting channels, refer the survivor immediately to the GBV service provider.<sup>59</sup>
- If a case is first received by the GBV service provider or through other identified reporting channels, the report will be sent to the GM operator to ensure it is recorded in the GM system.
- The GBV service provider provides the necessary support to the survivor until it is no longer needed (see Chapter 5).
- If requested by the IA, a survivor’s representative/advocate from the GBV service provider will participate in the SEA/SH resolution mechanism, including referral to the police if necessary and requested by the survivor (the only exception being when countries have mandatory reporting laws). The survivor must give the representative from the GBV service provider consent to participate in the mechanism on her/his behalf. Children should always be given the option of having a representative/advocate present.<sup>60</sup>
- As part of the established resolution mechanism SEA/SH allegations are considered and assessed, paying attention to due process for all involved, and in coordination with the accountability framework of the employer of the subject of the complaint. Agreement is reached on a plan for resolution as well as the appropriate disciplinary action for the perpetrator, all within the shortest timeframe possible to avoid further trauma to the survivor.
- In consultation with the GBV service provider, the appropriate representative from the IA is tasked with implementing the agreed-upon action plan, which should always be in accordance with local legislation, the employment contract and the CoC.
- Through the GBV service provider, the SEA/SH resolution mechanism advises the GM operator that the case has been resolved, and it will then be closed in the GM.
- The IA and the World Bank will be notified that the case is closed.

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<sup>59</sup> Survivors of SEA/SH may need access to police, justice, health, psychosocial, safe shelter and livelihood services to begin healing from their experience of violence. These can be arranged by the GBV service provider on their behalf in accordance with the survivors’ wishes.

<sup>60</sup> For additional guidance see, e.g., Technical Note, UN Victims Assistance Protocol (ENG) 2021\_final.pdf (interagencystandingcommittee.org), available at:

[https://psea.interagencystandingcommittee.org/sites/default/files/2021-11/Technical%20Note UN%20Victims%20Assistance%20Protocol%20%28ENG%29%202021\\_final.pdf](https://psea.interagencystandingcommittee.org/sites/default/files/2021-11/Technical%20Note%20UN%20Victims%20Assistance%20Protocol%20%28ENG%29%202021_final.pdf)

126. As noted earlier, the GBV service provider and IA representatives involved in the SEA/SH case resolution, need to understand their legal obligations when it comes to reporting SEA/SH cases to the police. Reporting should be done in accordance with the law, especially in cases that require mandatory reporting of certain types of GBV allegations, such as sexual abuse of a minor. When there is no legal obligation to report the case according to the local law, survivors make the decision of whether to report cases to the GM for resolution and to other service providers; reporting of a case to anyone can only be made with the consent of the survivor.

### Ensuring Appropriate Support for Survivors

127. The support provided to survivors through GBV service providers should include: (i) health; (ii) psychosocial; and (iii) legal support. Services should follow global standards and guidelines.<sup>61</sup> For children, minimum standards for caring for child survivors should be followed.<sup>62</sup>
128. Any survivor reporting SEA/SH through a reporting mechanism in a World Bank-financed IPF should receive care regardless of whether the perpetrator is known to be associated with the project or not. This is because:
- Often, the specifics of the perpetrator may not be known at the time that support services start, and once started, a survivor should be able to continue to access care.
  - The increased SEA/SH sensitization activities linked to Bank-financed projects in the communities adjoining the project may lead survivors in these communities to seek services through the project, regardless of whether the perpetrator was linked to the project or not.<sup>63</sup>
129. With regard to the support given to the survivor by the GBV service provider, under the survivor-centered approach the case is only closed when the survivor no longer requires support.

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<sup>61</sup> Quality standards for medical care can be found in WHO, 2014, Health Care for Women Subjected to Intimate Partner Violence or Sexual Violence: a clinical handbook, available at: <https://apps.who.int/iris/handle/10665/136101>. Other service standards can be found in UN Women, Essential Services Package for Women and Girls Subject to Violence, 2015, available at: <https://www.unwomen.org/en/digital-library/publications/2015/12/essential-services-package-for-women-and-girls-subject-to-violence>; and UNFPA, 2015, Minimum Standards for Prevention and Response to Gender-Based Violence in Emergencies, available at: <https://www.unfpa.org/sites/default/files/pub-pdf/GBVIE.Minimum.Standards.Publication.FINAL.ENG.pdf>.

<sup>62</sup> IRC and UNICEF, 2012, Caring for Child Survivors of Sexual Abuse, available at: <https://www.unicef.org/documents/caring-child-survivors-sexual-abuse>

<sup>63</sup> While some have expressed concerns that projects may engender GBV reporting, experience has shown that reporting of GBV is generally low globally. Even though a third of women experience violence by an intimate partner, or sexual violence by a stranger, only 7 percent of women and girls experiencing GBV report the incident to a formal source (regional variations go from 2 percent in India and East Asia to 14 percent in Latin America and the Caribbean).



## Reporting to Management

130. The World Bank has introduced the “Environmental and Social Incident Response Toolkit” (ESIRT) to outline procedures for World Bank Staff to report negative environmental and social incidents in an IPF. ESIRT outlines the requirements for reporting SEA/SH cases and has a protocol that defines incidents using three categories. “Indicative” events are addressed within the Task Team and “Serious” events need to be elevated to the Country Manager/Director, Global Practice Manager, Social and Environmental Practice Managers, Relevant Program Leaders, and Environmental and Social Standards Advisor (previously called Regional Safeguards Advisor), who may then advise the appropriate Vice Presidents. Finally, a “Severe” event should be reported to the Vice Presidents by the Task Team within 24-48 hours of notification.<sup>64</sup>
131. The information required to meaningfully report to management on SEA/SH cases should come from the monitoring of cases of SEA/SH in the GM and by reviewing regular supervising Engineer’s reports. As noted in Chapter 4, Task Teams should include key data on SEA/SH in the Aide-Memoires and ISRs.

## Resolving and Closing a Case

132. There are two elements related to resolving and closing a SEA/SH case:
- The internal project system, in which the case is referred to the GBV service provider for survivor support, and appropriate actions are taken against perpetrators through the established SEA/SH resolution mechanism; and
  - The support that the survivor receives from the GBV service provider.
133. As described earlier, when a complaint is received, it is registered in the project GM and referred to the GBV service provider with the consent of the complainant. The service provider initiates accountability proceedings with the survivor’s consent.
- If the survivor does not wish to place an official complaint with the employer, the complaint is closed.<sup>65</sup> Survivor-centered inquiries to ensure a safe, respectful workplace may proceed depending on a risk assessment to assess safety of survivor(s).
  - When the survivor proceeds with the complaint, the case is reviewed through the established SEA/SH resolution mechanism and a course of action is agreed upon; the appropriate party who employs the perpetrator (i.e., the contractor, consultant, or IA) takes the agreed disciplinary action in accordance with local legislation, the employment contract and the CoC. Within the established SEA/SH resolution mechanism, it is confirmed that the action is appropriate, and the GM is then informed that the case is closed.

<sup>64</sup> See Figure 2 of ESIRT for World Bank Staff guidance (Nov 2018):

<https://wbdocs.worldbank.org/wbdocs/component/drl?objectId=090224b08664566d&Reload=1579900748523&dmfClientId=1579900748523>

<sup>65</sup> However, if the information provided warrants a review of risk mitigation measures these should still be undertaken if they can be done in a manner that does not add harm to the survivor.

134. All SEA/SH survivors who come forward before the project’s closing date should be referred immediately to the GBV service provider for health, psychosocial and legal support. If a project is likely to close with SEA/SH cases still open, prior to closing the project appropriate arrangements should be made with the GBV service provider to ensure that there are resources to support the survivor for an appropriate time after the project has closed, and at a minimum for two years from the time such support was initiated. Funding for this cannot be provided by the project after the closing date, so other arrangements will need to be made, such as financing by the Borrower, involving other projects within the portfolio that may have aligned objectives and budget flexibility—or in extreme circumstances the project closing date may need to be extended.

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# ANNEX 1: Codes of Conduct for Contractors and the SEA/SH Prevention and Response Action Plan

1. To build a system for SEA/SH risk prevention and mitigation, projects must:
  - Have all employees of contractors (including sub-contractors), supervising Engineers and other consultants with a footprint on the ground in the project area sign codes of conduct (CoCs);
  - Have an effective SEA/SH Action Plan so that workers understand behavior expectations and policies, as well as an effective GM. This Action Plan should include training and communication. It should also include plans to make the project-affected community aware of the CoC the project staff have just signed; and
  - As part of the SEA/SH Action Plan, define accountability and response protocols, which set out the procedures followed for holding individuals accountable and penalizing staff that have violated SEA/SH policies.

## Codes of Conduct from SPD

### Code of Conduct for Contractor's Personnel (ES) Form

**Note to the Employer:**

*The following minimum requirements shall not be modified. The Employer may add additional requirements to address identified issues, informed by relevant environmental and social assessment.*

*The types of issues identified could include risks associated with: labour influx, spread of communicable diseases, Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) etc.*

**Delete this Box prior to issuance of the bidding documents.**

**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 take into account Contract-specific issues/risks.

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

### Code of Conduct for Contractor's Personnel

We are the Contractor, [enter name of Contractor]. We have signed a contract with [enter name of Employer] for [enter description of the Works]. These Works will be carried out at [enter the Site and other locations where the Works will be carried out]. Our contract requires us to implement measures to address environmental and social risks related to the Works, including the risks of sexual exploitation, sexual abuse and sexual harassment.

This Code of Conduct is part of our measures to deal with environmental and social risks related to the Works. It applies to all our staff, labourers and other employees at the Works Site or other places where the Works are being carried out. It also applies to the personnel of each subcontractor and any other personnel assisting us in the execution of the Works. All such persons are referred to as “**Contractor’s Personnel**” and are subject to this Code of Conduct.

This Code of Conduct identifies the behavior that we require from all Contractor’s Personnel.

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

## **REQUIRED CONDUCT**

Contractor’s Personnel shall:

1. carry out 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 Contractor’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 Sexual Harassment, which means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature with other Contractor’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 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, Sexual Exploitation and Abuse (SEA), 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 the grievance mechanism for Contractor’s Personnel or the project’s Grievance Redress Mechanism.

### **RAISING CONCERNS**

If any person observes behavior 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 Contractor’s Social Expert with relevant experience in handling sexual exploitation, sexual abuse and sexual harassment cases, or if such person is not required under the Contract, another individual designated by the Contractor to handle these matters*] in writing at this address [ ] or by telephone at [ ] or in person at [ ]; or
2. Call [ ] to reach the Contractor’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 behavior 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 Contractor’s Personnel may result in serious consequences, up to and including termination and possible referral to legal authorities.

#### **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(s) with relevant experience*] requesting an explanation.

Name of Contractor’s Personnel: [insert name]

Signature: \_\_\_\_\_

Date: (day month year): \_\_\_\_\_

Countersignature of authorized representative of the Contractor:



Signature: \_\_\_\_\_

Date: (day month year): \_\_\_\_\_

### **Contents of a SEA/SH Action Plan**

1. As described in Chapter 3.3, the SEA/SH Action Plan outlines how the project will put in place the necessary protocols and mechanisms to mitigate SEA/SH risk in the project, as well as to address any SEA/SH issues that may arise.
2. Sample documents and other materials to support implementing the recommendations are available on the WBG GBV Intranet page:

<https://worldbankgroup.sharepoint.com/sites/WBGender/sitepages/publishingpages/information-about-sexual-exploitation-abuse-and-harassment-in-world-bank-operations-03172021-112450.aspx>

## ANNEX 2: Collecting Information on SEA/SH

1. It is generally unnecessary to undertake new surveys to determine SEA/SH risks as key information is likely already available from country-level Demographic and Health Surveys or nationally representative standalone surveys on violence against women and girls. Eliminating various forms of violence faced by women and girls is also part of several of the Sustainable Development Goals and has led to an increase in data collection and reporting on GBV.<sup>1</sup>
2. There should be **absolutely no data collection** related to SEA/SH from anyone who may be a survivor without making referral services available to support them. If data collection is necessary, Task Teams should confirm that protocols are in place to enable referral of participants disclosing experiences of violence **before data collection commences to avoid retraumatizing survivors**. Training of researchers must cover all safety and ethical guidelines related to GBV. **No focus group discussions with community members asking about personal experiences of GBV or SEA/SH in particular should be undertaken**. Given that IPV and/or non-partner sexual assault affects 35 percent of women aged 15-49, focus groups are likely to have women who are survivors of an incident of GBV. For more information on how to discuss GBV ethically, see:
  - The Violence Against Women and Girls Resource Guide [Ethics page](#)
  - [Ellsberg M, and L. Heise. 2005. Researching Violence Against Women: A Practical Guide for Researchers and Activists. Washington DC, United States: World Health Organization, PATH.](#)
  - [World Health Organization. 2001. Putting women first: Ethical and safety recommendations for research on domestic violence against women.](#)
  - [World Health Organization. 2007. WHO Ethical and safety recommendations for researching, documenting and monitoring sexual violence in emergencies.](#)
3. When data is unavailable, however, and data collection is undertaken on topics related to GBV, such as help-seeking behaviors, perceptions of quality of GBV service providers, or safety mapping of communities, the following guiding principles are to be followed and the ethical issues concerning GBV data collection are to be carefully considered. Only if these can be properly implemented, should data collection be done.
  - The benefits to respondents or communities of documenting GBV must be greater than the risks to them.
  - The safety and security of all those involved in information gathering about GBV is of paramount concern and should be continuously monitored.

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<sup>1</sup> For example, see the DHS Program website, available at: <http://dhsprogram.com/What-We-Do/Survey-Types/DHS.cfm>

- Information gathering and documentation must be done in a manner that presents the least risk to respondents, is methodologically sound, and builds on current experience and good practice.<sup>2</sup>
- Basic care and support for survivors must be available locally before commencing any activity that may involve individuals disclosing information about experiences of GBV.
- The confidentiality of individuals who provide information about GBV must be protected at all times.
- Anyone providing information about GBV must give consent before participating in the data gathering activity.
- All members of the data collection team must be carefully selected and receive relevant and sufficient specialized training and ongoing support.
- Additional safeguards must be put into place if children (i.e., those under 18 years) are to be the subject of information gathering.<sup>3</sup>

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<sup>2</sup> An example of this is the Ethical and Safety Recommendations section: <http://www.vawresourceguide.org/resources#esr>. In particular, Ellsberg, M., and L. Heise. 2005. *Researching Violence Against Women: A Practical Guide for Researchers and Activists*. Washington DC, United States: World Health Organization, PATH.

<sup>3</sup> See recommendation 8 in World Health Organization, 2007, *WHO Ethical and safety recommendations for researching, documenting and monitoring sexual violence in emergencies*, available at: <https://www.who.int/publications/i/item/9789241595681>.

## ANNEX 3: The SEA/SH Risk Assessment Tool

1. To help assess the risk of project-related SEA/SH, the Gender Group, alongside colleagues from various Global Practices, has developed the SEA/SH Risk Assessment Tool.<sup>1</sup> The goal of the tool is to stimulate thinking around the risk of project-related SEA/SH. The tool draws on information from a variety of sources to give each project a risk “score” based on the responses to each individual question. The risk score is calculated on a scale of 0 to 25: projects that score 0-12.25 are considered “**Low**” risk; 12.5-16 “**Moderate**” risk; 16.25-18 a “**Substantial**” risk, and 18-25 “**High**” risk. Projects that are in preparation use Sections A and B and aggregate the scores for each section, which can be completed during the PCN phase. On the basis of the additional information gathered during project preparation, the risk should be updated as appropriate for the QER meeting or at the Decision Review meeting.
2. This tool does not address how the project itself may promote gender equality and reduce SEA/SH through its activities. Rather, this is an attempt to reduce the risk of SEA/SH, and allow Task Teams to determine the level of SEA/SH risk that is present in a project before mitigation measures are introduced.
3. The tool is comprised of the following sections:
  - Section A provides an overview of the “**Country context**,” specifically related to the country’s commitment to gender equality and its national incidence of violence.
  - Section B, “**Project context**,” is critical since no matter what the country context, the project in itself can create new risks and vulnerabilities for SEA/SH that may not have existed before. This section is weighted more heavily than Section A.
4. It is important to note that none of the indicators in the tool can alone predict occurrences of SEA/SH, nor does having a good score on any one indicator mean that SEA/SH incidents will not occur. No matter what the project context, Bank projects can influence the risk of SEA/SH, by virtue of shifting existing power dynamics and financial relationships. A lower risk score does not mean that the project does not carry any SEA/SH risk, nor does a high-risk score mean that the project cannot proceed. Rather, this is a tool to help Task Teams to think about the types of measures needed to mitigate SEA/SH risks and adequate response provisions that can be implemented to best accommodate their project setting.
5. The tool contains indicators on GBV against which Task Teams assess their project. For example, the first two indicators under Section A provide an estimate of how prevalent IPV and any sexual violence perpetrated by a partner or a non-partner is at the national level. The first indicator “Prevalence of intimate partner violence” is intended to give an overview of levels of violence against women in the country. No direct correlation has been established between the risk of SEA within a project and the levels of violence against women and girls in countries; however, this statistic is important for giving

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<sup>1</sup> In addition, an accompanying Risk Assessment Methodology Guidance Note provides greater detail and guidance for the Risk Assessment Tool and can be found [here](#).

a sense of the country context within which the project occurs. The national IPV prevalence is compared with the regional average as per WHO regional estimates (2013). To assess the risk, higher risk is where national IPV prevalence is above the regional average<sup>2</sup> and lower risk is where national IPV prevalence is below the regional average (Figure A3.1). Section A will be pre-populated to provide context for Task Teams on the country’s commitment to gender equality and national incidence of violence.

**Figure A3.1: SEA/SH Risk Assessment Tool Section A - Country Context – Questions 1-13**

Item Number	P# Here:								<--TTLS: Fill out the cells in yellow
	Project Name Here								Notes or Comments from individual(s) completing worksheet
	Characteristic	Measure	Rating	Numeric Rating	Possible scoring	Low Score	Medium Score	High Score	
<b>Section A: Country Context</b>									
<b>Country-level violence background</b>									
1	<a href="#">Prevalence intimate partner violence</a> (select the country then in the 'Common Indicators' tab and scroll to "Physical or sexual violence by a husband/partner")				Higher Risk is having IPV prevalence above regional average per DHS data (see next tab). Lower Risk is having IPV prevalence below the regional average per DHS data (see next tab).	0		0.5	
2	<a href="#">Prevalence of any form of sexual violence</a> (select the country then in the 'Complete List' tab and click the "Domestic Violence" tab. Select the "Experience of sexual violence" option, then select "Women who ever experience sexual violence" option)				Higher Risk is having a sexual violence prevalence above regional average per DHS data (see next tab). Lower Risk is having a sexual violence prevalence below the regional average per DHS data (see next tab).	0		1.0	
3	<a href="#">Prevalence of child marriage (defined as marriage before exact age 18 reported by women)</a>				Low prevalence 0-23.9 Medium prevalence 24-36.9 High prevalence 37-100	0	0.5	1.0	
4	<a href="#">State Department Trafficking in Persons report (Tier 1-3, with one low and 3 high risk)</a>				Higher risk is Tier III and Tier II watch list Medium risk is Tier II Lower risk is Tier I	0	0.25	0.5	

- Task Teams fill out Section B, on project-related risk factors and vulnerabilities for SEA/SH (Figure A3.2). For example, the tool contains an indicator on the level of infrastructure construction to capture whether the project includes any infrastructure construction or upgrading, as such projects can change the community’s landscape and use of space, social dynamics, and labor influx, and can affect the safety of workers involved in the construction as well as of women, girls and boys using or living in the surrounding areas. Higher risk is where there are major or substantial construction works, while lower risk would have small amounts of construction work.

<sup>2</sup> Per WHO 2013.

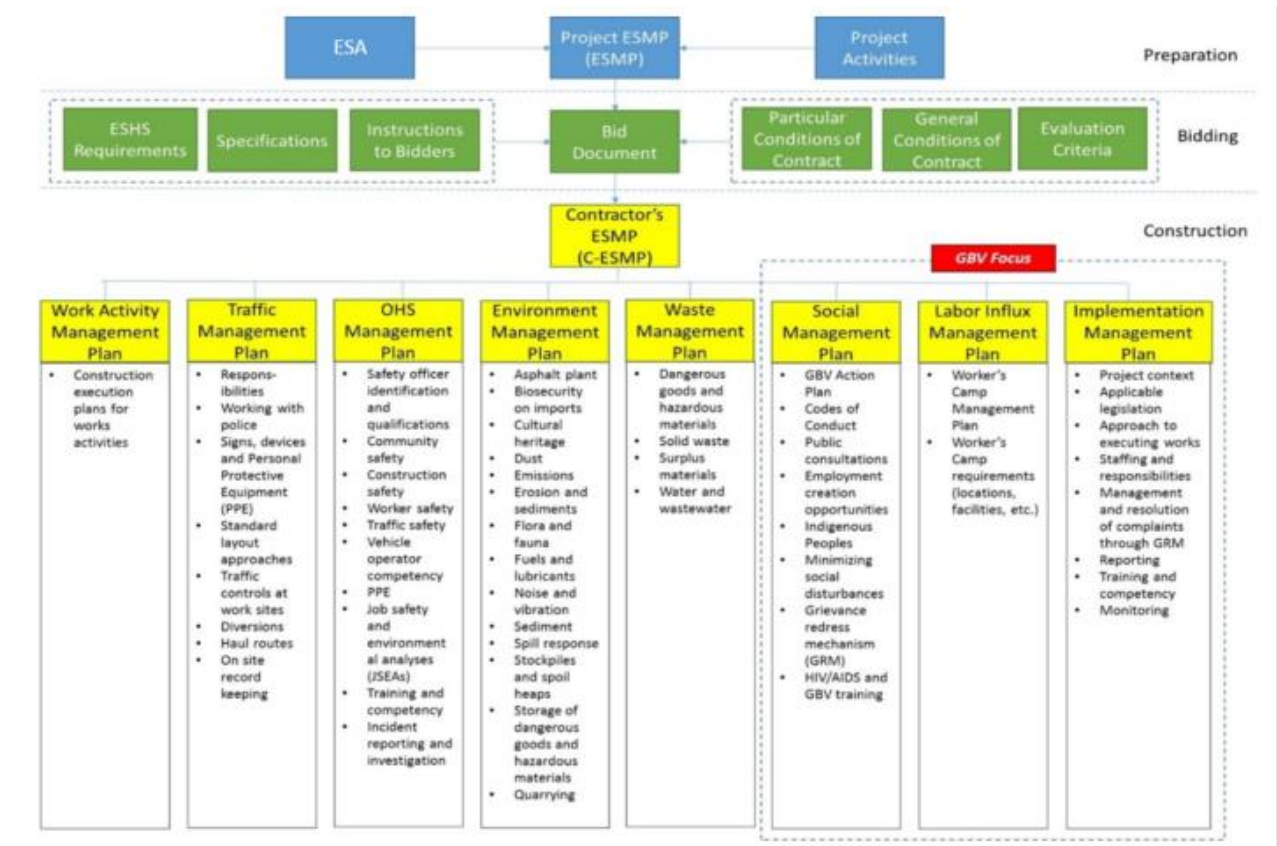
**Figure A3.2: SEA/SH Risk Assessment Tool Section B - Project Context – Questions 14-25**

Section B: Project Context								
14	<p>Is project in a humanitarian area of the country?  <a href="#">Go to Country in the "Countries" tab--&gt; click on Map of the country and view "Maps &amp; Infographics section" and "Updates" for latest humanitarian and emergency situation.</a></p>				<p>Higher risk is humanitarian or emergency situation in project area                      Lower risk is no presence of humanitarian or emergency situation in project area</p>			
15	<p>How much infrastructure construction, upgrading or rehabilitation does your project entail? (major = higher risk, medium = medium risk, small amount=lower risk)</p>				<p>Higher risk is major rehabilitation and construction                      Medium risk is moderate rehabilitation and construction                      Lower risk is low rehabilitation and construction</p>			
16	<p>According to the guidance from the labor <a href="#">influx note</a>, rate your project as high, medium or low risk related to the level of labor influx. If there is no labor influx, choose the low risk option. This determination is a self-judgement based on project parameters, using the labor influx note guidelines.</p>				<p>Higher risk can be associated with large number of workers, small remote community (low absorption capacity)/context with pre-existing social conflicts, high prevalence of GBV, weak law enforcement, presence of specific marginalized, vulnerable, ethnic groups, etc.</p>			

# ANNEX 4: Addressing SEA/SH in the Contractor's ESMP

- As described in Chapters 3 and 4, the project's ESMP contains elements to address SEA/SH risks. [Figure A4.1](#) shows the overall process from preparation through to construction.

**Figure A4.1: Managing Environmental and Social Risk from Project Preparation to Construction**



- During preparation, the ESA (if prepared) and project ESMP are prepared by the Borrower, publicly consulted on, reviewed and cleared by the World Bank, and publicly disclosed. The Borrower is required to implement the project ESMP as part of the World Bank's Financing Agreement with the Borrower. The project's ESMP principles are embodied in the project's ESHS requirements and specifications, along with the other procurement-related elements that form the bidding documents, with the project ESMP often included as part of the bidding documents.

3. In the bid, contractors have to provide a number of management plans<sup>1</sup> and these ultimately become part of the C-ESMP which the contractor must follow during civil works. The management plans will vary depending upon the nature of the projects, but SEA/SH needs to be included as appropriate.
4. The C-ESMP is the plan prepared by the contractor outlining how it will implement the works activities in accordance with the ESMP's requirements and in accordance with the contract. The development of an effective C-ESMP is a cornerstone for addressing SEA/SH, and more broadly the ESHS risks, during implementation. Contractually, the contractor must follow the C-ESMP, which is why it is important that the C-ESMP build upon the findings and proposed measures identified in the project ESA and ESMP.
5. The C-ESMP should include:
  - **Implementation of SEA/SH Action Plan and Accountability and Response Framework:** As described in Chapter 3, this is the detailed plan by which the contractor will implement the SEA/SH measures outlined in the project ESMP;
  - **Code of Conduct:** The agreed CoC to address behavior which will be used on the project for the contractor's workers, including sub-contractors and suppliers;
  - **Training Plan:** The plan for training workers on SEA/SH;
  - **Community Consultation Plan:** The strategy by which—in consultation with the IA—the communities adjoining the project will be advised on the project activities, how to make complaints, and what GBV support services are available; and
  - **Labor Influx Management Plan:** Should the project involve the influx of labor, how this influx will be managed—particularly to address SEA/SH risks.
6. To ensure that the SEA/SH risks are managed, it is important that:
  - The contractor prepares the C-ESMP in accordance with the requirements of the project ESMP. The C-ESMP should provide a detailed explanation of how the contractor will comply with the project's E&S requirements (embodied in the ESMP) and demonstrate that sufficient funds are budgeted for that purpose.
  - The contractor not carry out **any** works, including mobilization and/or pre-construction activities (e.g., limited clearance for haul roads, site access and work site establishment, geotechnical investigations or investigations to select ancillary features such as quarries and

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<sup>1</sup> As part of the bid, the contractor submits management strategies, implementation plans, and a CoC. The contractor also submits, on a continuing basis, for the engineer's prior approval, such supplementary management strategies and implementation plans as are necessary to manage the ESHS risks and impacts of ongoing works. These management strategies and implementation plans collectively comprise the C-ESMP.



borrow pits), unless the supervising Engineer<sup>2</sup> is satisfied that appropriate measures are in place to address SEA/SH risks and impacts through the C-ESMP.<sup>3</sup>

- Public consultations be held on the C-ESMP, with the active participation of the contractor<sup>4</sup> and the supervising Engineer’s E&S specialist. These consultations must be well documented and include separate consultations with women and girls.
  - The World Bank’s E&S and technical specialists review the C-ESMP and provide the Bank’s technical “no objection” to it being used.<sup>5</sup>
  - The C-ESMP be publicly disclosed on the Borrower’s project web site, and at other local locations.<sup>6</sup>
7. The approved C-ESMP should be reviewed periodically (typically not less than every six months), and updated in a timely manner, as required, by the contractor so that it contains measures appropriate to the works activities to be undertaken. The updated C-ESMP is subject to prior approval by the supervising Engineer, and ideally redisclosed on the IA’s web site.
8. The C-ESMP must include specific prevention and mitigation measures based on the ESMP, the final project design, the proposed construction method statements, the nature of the project site, etc. As shown in [Figure A4.1](#), the C-ESMP should include specific management plans addressing the various risks of the project. SEA/SH is usually addressed as part of the overall “Social Management Plan,” which identifies how to manage the impact of the project on the local community and workers.<sup>7</sup> For High-risk situations, the C-ESMP should include a labor influx plan to manage the impacts of labor influx on communities, especially with regard to SEA.<sup>8</sup>

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<sup>2</sup> Under the FIDIC contract, which is commonly used for supervising civil works financed by the World Bank, the “Engineer” is the client’s representative who is responsible to watch and supervise works, and test and examine materials to be used and workmanship employed in connection with the works. As part of the supervision team, there is the appointed “engineer,” who is often supported by “resident engineers” in the field. Other members of the supervision team include E&S specialists.

<sup>3</sup> With the agreement of the client and engineer, a phased C-ESMP may be prepared addressing specific agreed activities (e.g., mobilization). However, mobilization should not commence until GBV and labor influx management elements of the C-ESMP have been approved.

<sup>4</sup> Wording such as this should be included in the bidding document: “The Contractor shall participate in public consultations on the C-ESMP by attending public meetings at its own expense as requested by the Engineer to discuss the C-ESMP or any other aspects of the project’s environmental and social compliance of interest to the public.”

<sup>5</sup> While this is not a required Bank policy, it is good practice.

<sup>6</sup> Based on advice from the Legal Vice Presidency, while the project ESMP is disclosed by the World Bank through the external website, this should not be done for the C-ESMP.

<sup>7</sup> Templates and examples of SEA/SH Action Plans for projects according to SEA/SH risk rating are available through GBV focal points and on the WBG GBV intranet page:

<https://worldbankgroup.sharepoint.com/sites/WBGender/sitepages/publishingpages/information-about-sexual-exploitation-abuse-and-harassment-in-world-bank-operations-03172021-112450.aspx>

<sup>8</sup> Contact GBV Focal Points for example ESMPs: <https://radweb.worldbank.org/gendersea/process-and-resources>

## ANNEX 5: Working with GBV Service Providers

1. One of the most effective ways of addressing SEA/SH lies in working with GBV service providers and community organizations that are able to support the project in addressing any cases of SEA/SH, as well as helping to understand increased risks and proactively prevent SEA/SH. Prior to project appraisal, teams therefore need to identify organization(s) (e.g., NGOs and local institutions) who are trusted by the local community and are working on GBV prevention and response. In areas with high GBV prevalence, there may already be an existing mapping of GBV prevention and response actors in a given community. Coordination with local women’s organizations, child safeguarding organizations, government stakeholders (e.g., Ministry of Women’s Affairs, Ministry of Health, etc.) and UN agencies is essential.
2. GBV service providers for survivors of SEA/SH should be identified in accordance with [international standards that articulate a minimum basic package of services](#), ideally including case management support, health services, psychosocial support, police support and security, access to legal services, and shelter, if needed. When identifying GBV service providers, the quality of service provision should be a key consideration.
3. In keeping with a survivor-centered approach, accessing services should be the choice of the survivor. Access to police and justice services should be made available should the survivor choose to pursue charges through the local justice system.
4. It is important to map community organizations working on women’s and girls’ rights as they may be both entry points to services for survivors and useful allies for awareness-raising activities around the CoCs. When identifying community-based organizations, Task Teams can look for those with experience working with the local population to address the root causes of GBV by providing livelihood support or by implementing community-based interventions to challenge the norms and attitudes that underlie GBV. These two activities fall under the broad categories of GBV prevention and response.
5. The activities that GBV service providers provide a project depend upon the risk level. These can include the following:
  - Undertaking a community mapping of GBV risk “hot spots” and vulnerable target groups<sup>9</sup> that may be most susceptible to SEA/SH;
  - In consultation with the IA, on the basis of the community mapping, identifying the specific SEA/SH mitigation activities to be undertaken to address SEA/SH risks (see Chapter 2 for the types of risks to be considered);

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<sup>9</sup> For example, young women, aged 13-25 – specifically targeting school-aged girls and youth groups; young women, aged 25-35; young men, aged 14-25, school-aged boys and men who have sex with men; and commercial sex workers (particularly for HIV/AIDs).

- Providing services to survivors and/or becoming a victim advocate/victim accompanier, or undertaking case management organization. If required and in High-risk situations, the project should equip this organization with funds that will enable it to facilitate access to timely, safe and confidential services for the survivor (including money for transportation, documentation fees, and lodging if needed);
  - Providing training related to ensuring knowledge of standards laid out in the CoC and services that are available for survivors;
  - Ensuring that the project has “safe spaces” where survivors can report allegations of SEA/SH to trained personnel;
  - Raising awareness about the existing GM and supporting the development of a SEP; and
  - Channeling complaints to the GM (see separate note on GMs for SEA/SH in World Bank-financed projects).
6. **Contracting the GBV service provider.** Experience has shown that the most effective approach is for the IA to hire the GBV service provider. Among the advantages of this approach are:
- The same GBV service provider can be used for multiple contractors, which is not only more cost effective, but also helps ensure consistent provision of services across the project.
  - The GBV service provider can be contracted and mobilized well in advance of the contractor, thereby avoiding any risk of gaps in support during the initial stages of the project.
  - Having the GBV service provider report directly to the IA will make it easier to ensure quality control and consistency of service delivery.
7. Ideally the GBV service provider would also cover HIV/AIDS support services—but not all have the capabilities to do so. In High SEA/SH risk contexts, it may be advisable to put a GBV service provider/NGO under contract to the IA to provide a range of SEA/SH mitigation services throughout the life of the project, as well as case referral services if cases of SEA/SH arise under the project. In other (somewhat less risky) circumstances, it may be more appropriate to require the IA to hire a fulltime GBV specialist (typically as part of its PMU) to ensure the provisions are being adhered to appropriately.
8. Sample TOR are available on the WBG GBV Intranet page (both for GBV service providers/NGOs and for GBV specialists hired by the IA):

<https://worldbankgroup.sharepoint.com/sites/WBGender/sitepages/publishingpages/information-about-sexual-exploitation-abuse-and-harassment-in-world-bank-operations-03172021-112450.aspx>

## ANNEX 6: Using Technology to Address SEA/SH

1. There are several ways technology can be used to raise awareness of SEA/SH, help mitigate SEA/SH risks, and enable better monitoring and response to SEA/SH allegations. It is important to note that social media should **not** be used, e.g., for monitoring or as an alert mechanism, as confidentiality and security of SEA/SH survivors is paramount. Some examples of technologies that have been developed externally and by World Bank Task Teams include those in the following paragraphs.
2. **Great Lakes Trade Facilitation Project: Leveraging technology to measure and monitor SEA/SH risks.** Small-scale cross-border trade is a key source of livelihoods for many in the developing world. In Sub-Saharan Africa, the vast majority of those traders are women. Every day, they cross borders multiple times to trade in goods and also services, facing risks of abuse and exploitation including SH and other forms of GBV. In response to such challenges, the World Bank is currently supporting various measures, including the implementation of the “Great Lakes Trade Facilitation Project” (GLTFP). Active at selected borders between the Democratic Republic of Congo, Rwanda, and Uganda, and with plans for extensions to others in Burundi, Tanzania, and Zambia, the intervention aims at facilitating small-scale cross-border trade through infrastructural improvements, policy and procedural reforms, capacity building, and awareness-raising, along with other measures to improve behavior at target border locations and to prevent and mitigate SEA/SH risks. Some GLTFP measures rely on state-of-the-art technology. In each target country, for instance, the project supports the establishment of national toll-free phone line systems to allow traders, and especially women, to anonymously report abuses suffered at the border, both via SMS and voice calls, using basic GSM handsets with no access to the internet. Reports are then automatically stored in and processed by a cloud-based, open-source platform, and subsequently visualized on a website available in two versions: one open to the public, providing details and updates on the status of each issue, that can be used for monitoring and advocacy purposes; and a second, private and only accessible through log-in credentials, which offers selected stakeholders, e.g., border agencies, traders’ associations and civil society the opportunity to review and take action on the various issues reported by traders. In order to preserve their privacy and to minimize the risk of retaliation, the system is also designed in such a way that all reports are submitted and reviewed in total anonymity.
3. **SEA/SH module of the Grievance and Complaint Logging System:** The Grievance and Complaint Logging System (GCLS) is a free and open-source database system developed by the Pacific Transport team to receive and manage complaints. The system has an add-in module that allows survivors of SEA/SH to safely and securely submit their grievance through the project website. On the back end where complaints are processed, the name of the survivor and the grievance are encrypted and can only be accessed through a one-time access password that is sent to a pre-configured email address managed by the responsible grievance manager or GBV service provider. A copy of the anonymized complaint is also directly submitted to the responsible Task Team Leader.
4. **Road Safety app:** [A transport team in India](#) led the development of a Road Safety app which has a special focus on women’s safety. The road safety solution comprises two parts: (i) a mobile app for citizens; and (ii) a control room application for road safety authorities. The mobile app is used by citizens to alert friends and authorities when in need. It has an easy-to-use interface, from which a person who has met with an accident or is a victim of a street crime can choose the appropriate

option, with immediate alerts sent to the relevant nearby authorities and to a pre-configured set of family members. In case of allegations of stalking where it may not be possible to open the app on the mobile or where using a mobile phone will increase risk, the team developed an option whereby women can press a button on a smart amulet (that can be worn conspicuously as a piece of jewelry) to trigger the alert.

5. **Circle of 6:** “Circle of 6” is an app that lets users choose six trusted friends to add to a “circle” to whom the user can automatically send a pre-programmed SMS alert message with the user’s location when in a risky or uncomfortable situation. In dangerous and critical situations there are also two pre-programmed national hotlines or local emergency numbers which are called.
6. **myPlan App:** The “myPlan” is a mobile app to help with safety decisions if a person is experiencing abuse in an intimate relationship. Through the password-protected app, a set of personalized questions are asked of survivors to provide guidance on different options available to them to protect themselves.

## ANNEX 7: SEA/SH Training Programs

1. There are some key principles that should be considered when developing SEA/SH training programs:
  - **Who:** The SEA/SH training program should be aimed at the target groups identified in the SEA/SH Action Plan. Typically, these are: (i) workers, both from the contractor and sub-contractors; (ii) consultants, such as the supervising Engineers or others working in the project area; and (iii) IA staff involved with the project. Managers are particularly important to train as they have the responsibility for ensuring compliance of staff with the CoCs as well as implementing sanctions for non-compliance. Training on SEA/SH should also be done within the project's adjoining communities and will need to be designed in an age-appropriate manner and format when children are included in outreach activities.
  - **When:** All employees should attend an induction training course prior to commencing work on site to ensure they are familiar with the company's commitments to address SEA/SH, and the project's SEA/SH CoC. The sanctions embodied in the CoC need to be clearly explained. It should be noted that the induction course will need to be repeated on a regular basis as new staff start on the project.
  - **How Often:** It is recommended that all employees attend a mandatory training course (no more frequently than monthly) for the duration of the contract starting from the first induction training prior to commencement of work to reinforce the understanding of the project's SEA/SH goals.
2. At a minimum, training should include (see examples of actual training courses at the end of this annex):
  - Definition of SEA/SH, and how the project can induce or exacerbate SEA/SH;
  - Roles and responsibilities of actors involved in the project (the standards of conduct for project staff should be captured in the CoC);
  - Case-reporting mechanism, accountability structures, and referral procedures within agencies and for community members to report cases related to project staff;
  - Services available for survivors of SEA/SH; and
  - Follow-up activities to reinforce training content.
3. Managers will require additional training to ensure that they are familiar with their roles and responsibilities in upholding the SEA/SH CoC. Managers should be required to attend and assist project-facilitated training courses for all employees. Ideally, managers should introduce the trainings and announce the learning evaluations, which should include questions on training quality and suggestions on improving the effectiveness of training. This will help ensure that staff see the importance of the training activities.
4. The project will also need to train:
  - The GM operator on how to handle GBV complaints in a survivor-centered manner and in line with the best interests of the child approach; and

- Any focal points that are part of the SEA/SH resolution mechanism will need training on empathetic and non-judgmental listening, and specific considerations when engaging with child survivors.

### Case Study 1: GBV Training in Uganda

In Uganda, a Bank team trained 55 representatives from various government ministries and agencies—ministries such as Energy, Transport, Urban, Education, and Gender, Labor, and Social Development, in April 2017. The two-day training had two goals: the first was to expand the capacity of World Bank staff and their counterparts to address the important issues of GBV within IPF involving major civil works; and the second was to enable the workshop’s participants to develop roadmaps for concrete action, using guidance and recommendations found in the [Violence Against Women and Girls Resource Guide](#).

The workshop included having participants address the ecological model for partner violence, using group discussions and “Post-It Notes” to identify key risk factors that intersect with the projects their ministries head. Groups discussed how early marriage, poverty, the lack of land titles, low literacy rates, cultural beliefs, and harmful norms could all be risk factors and drivers of GBV operating in their project-affected communities.

Participants were also given an overview of the [Violence Against Women and Girls Resource Guide](#), which explains how to initiate, integrate, and innovate on measures to prevent and respond to violence against women and girls. Working in groups by sector, participants applied these and other tools to develop roadmaps for different government agencies to use in the implementation of GBV Action Plans, focusing on:

- 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 people wishing to report cases of GBV, and their linkage with adequate response; and
- Promoting interventions to reduce the level of tolerance to GBV by contributing to community mobilization around project sites, including the use of partnerships with NGOs, national and local authorities and other leaders.

Participants concluded that all projects need to guard against GBV. During the sessions, participants opened up about their personal and professional journeys toward a better understanding of the significance of GBV. One participant, a transport engineer, said he had come to realize his job was not only about building roads, it was also about understanding the impact a project had on the communities around the project site, and about managing social risks, especially for women and children. Since the training several agencies have proactively incorporated activities to mitigate the risk of GBV their projects may exacerbate. For example, the Ministry of Energy has asked workers to sign a CoC and reinforces the messaging of the CoC in daily toolbox meetings. Moreover, the ministries are not just seeing their operations as a potential for increasing risks of GBV, they are approaching GBV as an area where they can contribute to positive change and are committed to playing a part in the elimination of violence against women and girls in Uganda.

**Vanuatu - Half Day Manager’s GBV Training Program**

Time	Topics	Group Work/Tools to Train
0800- 0830	Welcome	<ul style="list-style-type: none"> <li>Opening of training, and introduction of program and participants</li> </ul>
0830-0930	Role of a Manager while in Vanuatu  Role of a Leader	<ul style="list-style-type: none"> <li>Each manager writes thoughts and sticks notes on butcher paper</li> <li>Discussion</li> </ul>
0930-1000	Code of Conduct, do we understand it?	<ul style="list-style-type: none"> <li>Have copies available, and read through Code of Conduct and Action Plan</li> <li>Re-enforce the Code of Conduct - Highlight the role of a leader, emphasize role for the safety and protection of workers against abuse and exploitation and from exploiting and abusing others</li> <li>What are the organizational responsibilities? Managers are not meant to be police officers and do not have to fill that role. Goal is to promote a positive, safe and respectful work environment and surrounding</li> </ul>
1030-1230	CARE of Staff: Violence Against Women and Children (VAWC), Child Sexual Abuse, Exploitation	<ul style="list-style-type: none"> <li>Group work on planning a Response Protocol for what a Manager will do if abuse has taken place by one staff, or on one staff</li> <li>Print out Vanuatu Women's Centre (VWC) and GM referral pathways chart and distribute to managers</li> </ul>

**Vanuatu - Full Day Worker’s GBV Training Program**

Time	Topics	Group Work/Tool to Train
0800-0830	Welcome	<ul style="list-style-type: none"> <li>Short word of welcome</li> <li>Participants Introduce themselves</li> <li>All participants fill out pre-training baseline survey (only for induction sessions)</li> </ul>
0830-0930	Understanding Gender &	<ul style="list-style-type: none"> <li>PowerPoint slide on referral pathways from VWC Research Results of 2009 on “Women’s Lives &amp; Family Relationships”</li> </ul>



	Violence Against Women in Vanuatu	<ul style="list-style-type: none"> <li>• One of the following exercises: <ul style="list-style-type: none"> <li>- Group Work: Perception of Women &amp; Men in Vanuatu</li> <li>- Group Work: Power Dynamics (Tool 17 from Road to Good Health)</li> </ul> </li> </ul>
<b>0930-1045</b>	Types of Violence against Women and Children	<ul style="list-style-type: none"> <li>• Definitions of the types of violence – GBV, VAC, Domestic Violence (DV)/IPV, Family and Sexual Violence (FSV) <ul style="list-style-type: none"> <li>- Rape</li> <li>- Sexual assault (including transactional sex)</li> <li>- Physical assault</li> <li>- Emotional/psychological assault (withholding resources)</li> <li>- Sexual harassment</li> <li>- Cover the definitions used in Codes of Conduct and Vanuatu</li> </ul> </li> <li>• Group Work: Norms and social acceptance of violence - Impacts of GBV/FSV, VAWC and DV/IPV on Offender, Victim/Survivor, their Family, Community – how this leads to a culture of violence</li> </ul>
<b>1045-1100 Tea Break</b>		
<b>1100-1130</b>	Understanding Laws: Family Protection Act and Penal Code	<ul style="list-style-type: none"> <li>• What is consent? National and international laws on consent and legal age to give consent. Code of Conduct stance on consent</li> <li>• Penal Code and Family Protection Act, Application for Family Protection Orders (FPO)</li> </ul>
<b>1130-1200</b>	The GM and Reporting Cases	<ul style="list-style-type: none"> <li>• How to use the GM for reporting cases: How and who can you report to? VAIP, VPMU, VWC, police, etc.</li> <li>• Accountability and confidentiality of all reporters and survivors</li> </ul>
<b>1200-1230</b>	VWC Services	<ul style="list-style-type: none"> <li>• Linkages to Code of Conduct</li> <li>• VWC Counselling &amp; Support Services – How to seek help and/or refer people to VWC</li> <li>• Services provided by VWC for survivors of violence</li> <li>• What other support services exist in Port Vila?</li> </ul>
<b>1230-1330 Lunch Break</b>		
<b>1330-1415</b>	GBV and VAC Codes of Conduct	<ul style="list-style-type: none"> <li>• Code of Conduct: Do we understand it? Questions on Codes of Conduct?</li> </ul>

		<ul style="list-style-type: none"> <li>• Read through copies of Codes of Conduct and ensure participants understand it</li> <li>• Potential sanctions and penalties</li> </ul>
<p><b>1415-1445</b></p>	<p>Summarize, Evaluation and Close</p>	<ul style="list-style-type: none"> <li>• Open forum to summarize and reflect on training</li> <li>• Workshop Evaluation (after every session)</li> <li>• Evaluation through post-training survey (only before worker leaves project)</li> <li>• Closing</li> </ul>