



Guidance Note on Protection from Sexual Exploitation and Abuse and Sexual Harassment in TDB-funded Projects

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ACRONYMS

C-ESMP	Contractor's Environmental and Social Management Plan
CoC	Code of Conduct
E&S	Environmental and Social
ESA	Environmental and Social Assessment
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESHS	Environmental, Social, Health and Safety
ESIRT	Environment and Social Incident Response Toolkit
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standard
GBV	Gender-based Violence
GCLS	Grievance Complaint Logging System
GPN	Good Practice Note
GM	Grievance Mechanism
HIV/AIDS	Human Immunodeficiency Virus/Acquired Immune Deficiency Syndrome
ICB	International Competitive Bidding
IPF	Investment Project Financing
ISR	Implementation Status Report
IVA	Independent Verification Agent
M&E	Monitoring and Evaluation
NCB	National Competitive Bidding
NGO	Nongovernmental Organization
PCN	Project Concept Note
QER	Quality Enhancement Review

SBD	Standard Bidding Document
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SEP	Stakeholder Engagement Plan
SPD	Standard Procurement Document
TDB	Trade Development Bank
TOR	Terms of Reference
TPM	Third-Party Monitoring organization for SEA
UN	United Nations
VAC	Violence Against Children
VAWG	Violence Against Women and Girls
WHO	World Health Organization

1. BACKGROUND

This Annex builds on TDB's ESMS to provide specific guidance that supports risk analysis, control and mitigation measures related to sexual exploitation and abuse (SEA) and sexual harassment (SH) in all TDB-financed activities. It is particularly relevant to TDB-financed complex infrastructure projects, which can present considerable social risks, including for SEA and SH.

This Annex seeks to:

- Ensure that the TDB policies and procedures are adequate to manage SEA and SH risks associated with all large-scale projects and transactions financed by the Bank;
- Ensure that the SEA and SH policies and procedures applicable as a component of the Bank's social risk management are in line with global standards and best practice.

The annex covers the broad areas of the TDB ESMS, including 1) understanding SEA and SH risk in bank-financed activities; 2) bank management commitment and organizational responsibility; 3) SEA and SH risk management process and procedures; 4) compliance monitoring and reporting; 5) capacity-building and awareness; and 6) stakeholder engagement and grievance mechanisms.

2. UNDERSTANDING SEA AND SH RISK IN BANK-FINANCED ACTIVITIES

2.1 Defining Sexual Exploitation and Abuse and Sexual Harassment¹

Sexual Exploitation is defined as: "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."²

Sexual Abuse is further defined as "the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions."³

Sexual Harassment is defined as "any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation

¹ For additional definitions linked to the implementation of this guidance note, see the glossary in Annex 1.

² See Sections 6.1 and 6.2 of Secretary-General's Bulletin on "Special measures for protection from sexual exploitation and sexual abuse" (ST/SGB/2003/13), 9 October 2003. Examples of sexual exploitation include: a community member is promised employment on a TDB-financed project site in exchange for sex; a project worker connecting water lines to homes requests a sexual favor for access to water connection; a project worker denies a woman passage through the worksite unless she performs a sexual favor.

³ Ibid. Examples of sexual abuse include: a project worker stays in the cafeteria after dinner and sexually assaults a kitchen staff member; a project worker touches an administrative staff member's breasts and says there is more to come; a supervisor for a subcontractor asks his female colleague to join him for a business dinner with the main contractor, and after dinner he asks her to entertain "the boss" in his room as an appreciation for the contract and her work.

to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.”⁴

When referencing sexual exploitation and abuse (SEA) in Bank-financed projects, SEA involves incidents perpetrated by any staff or contractors associated with the implementation of a project that the Bank is a lender to, against any project beneficiaries or members of project-affected communities.

SH differs from SEA in that it occurs between personnel/staff working on a project, and not between staff and project beneficiaries or communities. The distinction between SEA and SH is important so that agency policies and staff training can include specific instructions on procedures to prevent and respond to each.

Males and females can experience SEA and SH. However, women and girls are at a higher risk of these forms of violence based on gender discriminatory attitudes, norms and practices that contribute to sexual violence, abuse and harassment of females by males globally.⁵ Projects must anticipate and address the heightened risk for women and girls to SEA and SH.

Consent is a key consideration with regard to SEA and SH. SEA and SH arise 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. 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.

2.2 SEA and SH Risks Related to TDB-financed Projects

SEA is a risk for any project that interfaces with a community. However, risks increase in settings where incidents of violence against women and girls, and violence against children, are normalized and/or committed with impunity, and where survivors are unlikely to seek assistance due to social stigma, retaliation, or other security issues. In conflict-affected settings rule of law and basic protective infrastructure is often lacking, further contributing to

⁴ See Section 1.3 of Secretary-General’s Bulletin on “Prohibition of discrimination, harassment, including sexual harassment, and abuse of authority.” Examples of SH include: a project worker sends sexually explicit text messages to a coworker; a project worker leaves an offensive picture that is sexually explicit on a co-worker’s desk; a project worker asks all female employees to greet him with a kiss on the cheek every day before work.

⁵ Violence against women and girls experienced as a result of these gender discriminatory norms and practices, and that occur across the lifespan, are often captured under the umbrella term “gender-based violence” (GBV). See Annex 1 for the Inter-agency Standing Committee definition of GBV.

risks of violence against women and girls, and violence against children. In addition, large infrastructure projects can exacerbate the risk of SEA in a number of ways:

- Projects with a large influx of workers, particularly in impoverished communities, may increase the likelihood of exploitive and coercive sexual relations involving sex in exchange for goods or money. This could range from project workers engaging in the local prostitution trade, and/or becoming engaged in coercive sexual relationships with community members, particularly minors. Labor influx may contribute to other forms of child violence, such as child marriage, particularly in communities where marriage to an employed man is seen as the best survival strategy for an adolescent girl.
- Women and older adolescent girls may be hired as domestic staff by project workers, and/or may congregate around project sites to sell food and other goods. Close proximity without appropriate supervisory and preventative measures may increase the risk of sexual exploitation by project workers of female domestic workers and vendors.
- Large infrastructure projects may disrupt roads, schools, etc. Settings where projects are close to schools, or along routes frequently traversed by local women and girls may increase exposure to workers and, in turn risks of sexual exploitation or abuse. This is compounded when workers are not adequately supervised, or when there is inadequate lighting and other safety measures around schools and foot routes.

Similarly, SH is a risk for any work environment, particularly environments that are stringently hierarchal, give significant and/or undue power to management, and do not promote and reflect female leadership. In large infrastructure projects, additional risk factors for SH may include:

- Female laborers working alongside male laborers without adequate supervision of work sites; without separate latrine and other sanitation facilities for males and females; and without specific mechanisms for females to share concerns about their working environments, including concerns about sexual harassment.

3. TDB'S MANAGEMENT COMMITMENT TO PREVENTING AND RESPONDING TO SEA AND SH IN TDB-FUNDED PROJECTS

TDB is committed to developing, implementing and continuously improving management of E&S risks and opportunities to sustainable financing, including risks related to SEA and SH. TDB acknowledges that SEA and SH are likely to exist in a high proportion of projects it finances, and understands that lack of evidence about incidents cannot be translated to mean that incidents are not occurring. TDB also recognizes that effective action requires undertaking a range of preventive measures and response activities that are based on global best practices, but that also reflect contextual adaptation according to local knowledge and practice.

TDB's management commitment to addressing SEA and SH risks is underpinned by the following core principles⁶:

⁶ Adapted from "United Nations Protocol on Allegations of Sexual Exploitation and Abuse Involving Implementing Partners", March 2018, https://www.un.org/en/pdfs/UN%20Protocol%20on%20SEA%20Allegations%20involving%20Implementing%20Partners%20-%20English_Final.pdf

1. TDB will not partner with entities that fail to address SEA or SH through appropriate preventive measures, investigation and corrective action. Such failures shall constitute grounds for review of the relationship of any transaction agreements with TDB as necessary.
2. TDB places the human rights, interests and needs of all survivors at the center of efforts to prevent and address SEA and SH, adhering to the principles of 'do no harm,' confidentiality, safety and non- discrimination when responding to allegations of sexual exploitation and abuse or sexual harassment.
3. A survivor-centered approach is prioritized in when responding to a complaint, whereby the victim is informed of their rights, participates in decision-making processes and provides consent on the possible use and disclosure of their information.
4. In cases involving children, all decisions made regarding the prevention and response to SEA allegations are guided by the best interests of the child and the right of the child to participate and to be heard.

Organizational responsibility for implementing actions necessary to prevent and response to SEA and SH exists at all levels of the Bank, as illustrated in the table below.

TITLE	RESPONSIBILITY (Amended to include SEA and SH)
President	<ul style="list-style-type: none"> ▪ Overall responsibility for Business Principles and ESMS at the Bank. ▪ ESMS reporting to the Board of Directors, including on SEA and SH.
Chief Risk Officer (CRO)	<ul style="list-style-type: none"> ▪ Responsible for managing and reporting (to Management and the Board) on Bank-wide risk including the E&S Risk; ▪ Measuring and reporting on aggregated risk exposure across the Bank (including SEA and SH risks); ▪ Coordinating the design, implementation and monitoring of business continuity and other corporate risk management plans; ▪ Monitoring of compliance with internal controls (governance, control and assurance department). ▪ Monitor and report on progress with implementation of Departmental based risk management plans.
Investment/ Trade Finance Officer	<ul style="list-style-type: none"> ▪ Ensure appropriate consideration of E&S aspects at each stage of the investment process. ▪ Assess E&S risks, including SEA and SH, as part risk management during project appraisal and during the holding period. ▪ Liaise with the ESMS Coordinator to ensure the correct E&S requirements are included in the investment documents and adequate resources are committed to allow effective and appropriate implementation of the ESMS policy and procedures. ▪ In consultation with E&S manager, set an appropriate terms of reference and budget for the SEDD.
ESMS Manager	<ul style="list-style-type: none"> ▪ Ensure compliance with the Bank's E&S Policies and overall responsibility for the implementation of the ESMS at the Bank and clients (including SEA and SH). ▪ Participate in pipeline meetings and other appropriate forums to contribute to the investment process. ▪ Report E&S issues/infringements (including related to SEA and SH) to the lenders and ensure that risks are appropriately remedied. ▪ Supervising and approving all E&S reports. ▪ Answering any queries from lenders of an E&S nature.

TITLE	RESPONSIBILITY (Amended to include SEA and SH)
	<ul style="list-style-type: none"> Ensuring that E&S training needs of staff are met. Management of the ESMS document and ensuring that it is reviewed on a periodic basis.
ESMS Coordinator	<ul style="list-style-type: none"> Ensure that resources are committed at the Client Level for E&S and OHS management processes (including resources for prevention of and response to SEA and SH). Evaluating environmental and social compliance of Clients activities with the applicable ESMS requirements (including SEA and SH). Participate and contribute on all SEDDs whether it is being driven by external consultants or in-house resources.
E&S Specialist	<ul style="list-style-type: none"> Review Client submissions to ensure that they comply with the applicable regulations of the host country regulatory regime. Review E&S monitoring reports on a periodic basis and recommend enhancements related to SEA and SH where necessary. Prepare terms of reference for the E&S consultant for completion of the Social and Environmental Due Diligence (SEDD) based on the list of sector specific questions. Maintain and regularly update a list of potential E&S and OHS risks inherent in TDB's evolving business portfolio (including related to SEA and SH). Maintain on-going liaison and correspondence with the Client ESMS representative. Develop a program with the Client for the submission of quarterly or semi-annual E&S reports to TDB (that include attention to SEA and SH). Prepare bi-annual reports on local E&S issues/infringements and ensure that all serious incidents are appropriately addressed and risks remedied where possible. Prepare a lessons-learned report on each investment on an annual basis. Review annual E&S reports on Bank projects (with note of SEA and SH integration, as relevant).
Legal Officer	<ul style="list-style-type: none"> Prepare loan conditions and covenants. Ensure that appropriate environmental, social representations, warranties, and covenants are incorporated in each Client agreement (including those related to SEA and SH). Ensure appropriate E&S clauses and action plan are included in the legal agreements signed with the Bank's clients. Review any amendments to the loan conditions and covenants. Liaising with the ESMS manager to maintain a current E&S legal register for all the countries within which TDB operates.
Client (Borrower)	<ul style="list-style-type: none"> Comply with TDB's ESMS including guidance related to prevention of and response to SEA and SH. Provide project information as requested by TDB. Carry out ESIA (including related to SEA) along with feasibility studies and public consultations including disclosure of the ESIA findings to the authorities and the public. Secure appropriate E&S permits from the relevant authorities. Prepare an E&S management plan and compensation schemes. Prepare appropriate agreements on impacts relating to resettlement, livelihood losses and indigenous people.

TITLE	RESPONSIBILITY (Amended to include SEA and SH)
	<ul style="list-style-type: none"> ▪ Ensure adequate prevention measures related to SEA and SH, as well as reporting and investigation capacity and survivor response is laid out in the management plan, including duty to report any cases to TDB within a 24-hour time frame. ▪ Monitor implementation of E&S management plan and action plan to ensure compliance. ▪ Submit regular monitoring reports to TDB.
Client ESMS representative	<ul style="list-style-type: none"> ▪ Engagement with the contractors and communities to ensure that E&S requirements are met (including requirements related to SEA and SH). ▪ The implementation of TDB's E&S policies and ESMS at the Client level, including ensuring prevention measures related to SEA and SH, as well as reporting pathways and survivor response. ▪ Documenting and reporting local E&S issues/infringements to the Bank's ESMS coordinator. ▪ Ensure the implementation of remedial actions on serious incidents and appropriately address risks. ▪ Monitoring the implementation of Environmental and Social Action Plans at a Client level. ▪ Training client staff on an on-going basis on E&S issues and impacts related to their activities and on the implementation of the ESMS, including for SEA and SH.
External SEA/SH Expert as required by project risk level	<ul style="list-style-type: none"> ▪ Ensure appropriate consideration of SEA and SH as part of the SEDD or investment monitoring process. ▪ Ensure the correct SEA and SH requirements are included in the investment documents and adequate resources are committed to allow effective and appropriate implementation of the SEA and SH ESMS policy and procedures as outline in TDB guidance, including in relation to prevention of and response to incidents and adequate care and support to survivors. ▪ Report local SEA and SH issues/infringements/incidents to TDB and ensure that all emergency incidents are appropriately addressed, and risks remedied where possible.

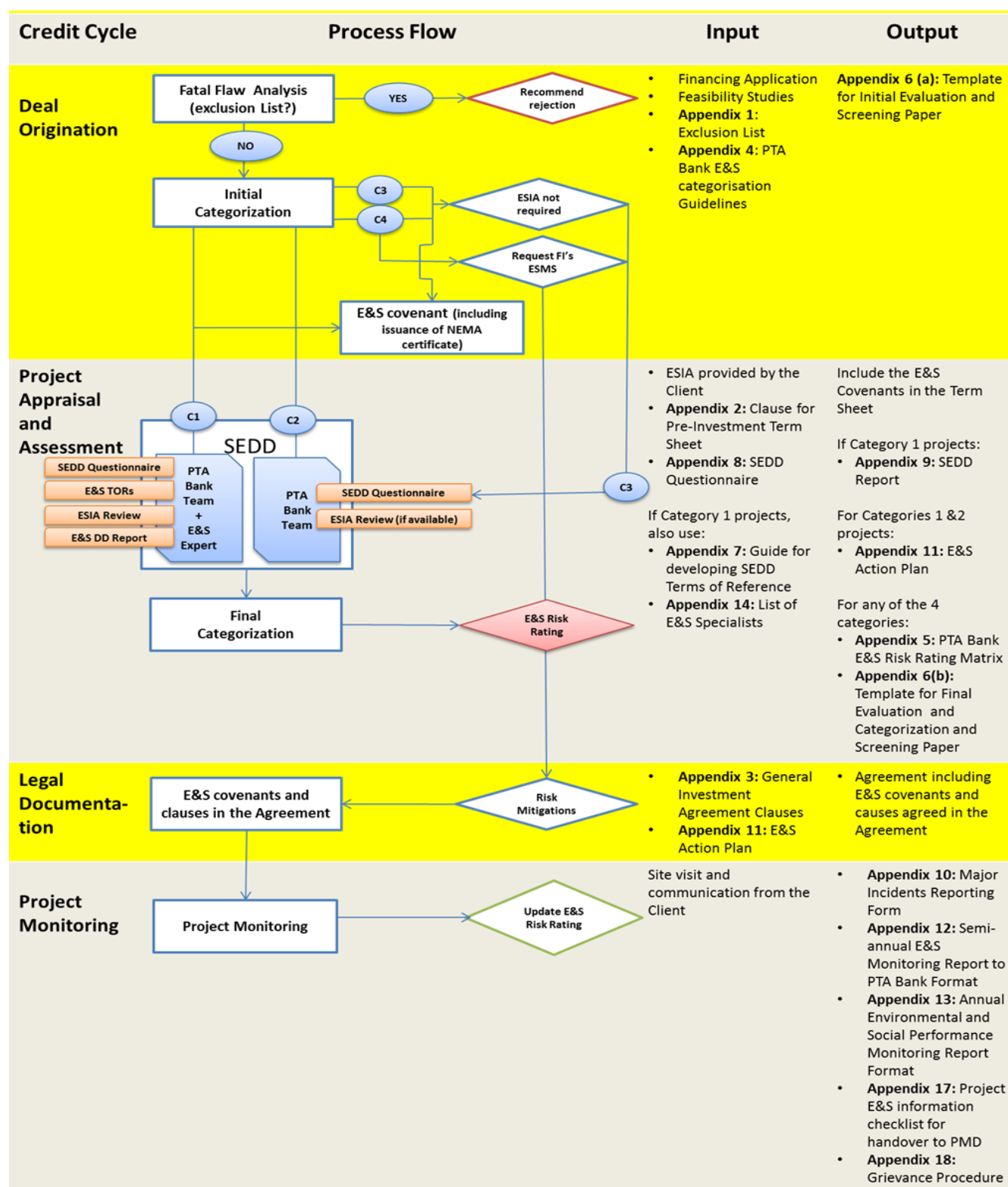
4. PROCESS FLOW AND PROCEDURES

Section 4 of the TDB ESMS defines the process to be followed for E&S risk management. The key steps in the process include:

- Step 1: Identifying fatal flaws and initial E&S categorization at deal origination stage;
- Step 2: Completion of Social and Environmental Due Diligence (SEDD) & final categorization at project appraisal and assessment stage;
- Step 3: Legal documentation; and
- Step 4: Project monitoring.

The process flow for implementation of TDB's ESMS is presented in **Diagram 1** below. Each step of the process will include actions to ensure that SEA and SH are adequately addressed in project planning, implementation, and monitoring.

Diagram 1: TDB E&S Process Flow



4.1 Step One: Fatal Flaw Analysis and Deal Origination

4.1.1 Fatal Flaw Analysis

At the stage of fatal flaw analysis, TDB will seek to determine the borrower's commitment, capacity and willingness to ensure SEA and SH prevention and response will be adequately integrated into project activities in line with TDB guidance. Exclusion analysis will consider the following basic issues:

- Has the borrower ever been a partner in a financing operation in which SEA or SH incidents were recorded and, if so, did the borrower take action to address these incidents? If no action was taken in a situation where a SEA or SH incident was recorded in a previous financing operation, project is excluded.
- Does the borrower have a basic understanding of its responsibilities to address SEA and SH as part of project oversight? If no, project is excluded.
- Is the borrower committed to preventing and responding to SEA and SH during the implementation of the project? If no, project is excluded.

4.1.2 E&S Categorization and Deal Origination

At the stage of deal origination, TDB will undertake a risk analysis of the project as it relates to SEA and SH. The rational for determination will be the Risk Assessment Tool, developed by the World Bank and adjusted for use by TDB. This SEA/SH Risk Assessment takes into consideration both project-specific details, such as labor influx levels, as well as the country context where the project takes place—such as in situations of conflict. Through 25 questions, 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.

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. 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 or SH risk is not an exact science. The tool is meant to be preliminary, to assist TDB to understand how a proposed project may have SEA and SH-related impacts. Where country-level prevalence data is not available to complete responses to specific questions with the Risk Assessment Tool, TDB has a responsibility to seek out additional data and estimate risk according to information that is available.

The preliminary SEA/SH risk rating should be included in the initial E&S covenant established as part of a deal origination process. On the basis of additional information gathered during project preparation, the risk should be updated as appropriate.

4.2 Step Two: Project Appraisal and Assessment

At the stage of project appraisal and assessment, and as part of the SEDD, TDB will verify the risk assessment undertaken by the borrower. This requires that the borrower will have undertaken an assessment of project risks related to SEA/SH in order to ensure that project agreements include context-specific plans to identify and implement prevention and mitigation measures to address the risks. There are two considerations:

- Project-related SEA/SH Risk Assessment: assessment of the risk of exacerbation/introduction of SEA at the community level and SH within the work environment; and
- Survivor Response Capacity Assessment: assessment of the local capacity to prevent and respond to GBV, and the availability of safe and ethical service provision for SEA or SH survivors.

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 ethically see Chapter 9 of the manual: Researching Violence Against Women: A Practical Guide for Researchers and Activists.⁷

4.2.1 Project-related SEA and SH Risk Assessment

The project-related SEA and SH risk assessment will be incorporated into the Environmental and Social Assessment (ESA). When considering SEA and 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 implement⁸:

- 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, particularly when workers are highly mobile.

In areas of Substantial and High risk of SEA or SH, as determined by the SEA/SH Risk Assessment undertaken by TDB at the stage of deal origination, the ESA research team must include an SEA/SH expert, so that that SEA and SH challenges can be properly assessed, and appropriate prevention, risk mitigation and response measures proposed. For ESAs to capture the socioeconomic, cultural and risk context for women and girls, they should consider, for example:

- Existing gender country diagnostics/country action plans;

⁷ Also see: George Washington Women's Institute, 2017. *Gender-based Violence Research, Monitoring and Evaluation with Refugee and Conflict-affected Populations*, <https://globalwomensinstitute.gwu.edu/sites/g/files/zaxdzs1356/f/downloads/Manual%20and%20Toolkit%20-%20Website.pdf>

⁸ 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. 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. Borrowers 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.

- Data on partner/non-partner physical violence against women;
- Data and/or information on cultural practices vis-à-vis women and girls (early marriage, physical practices).
- Information obtained from consultations carried out in the preparation of the project (see Section 7.1 on Stakeholder Engagement).

4.2.2 Survivor-response Capacity Assessment

An adequate response to SEA and/or 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 can be critical not only for supporting the project in addressing any case of SEA or SH that may arise, but also in assisting the project to proactively prevent incidences of SEA and SH. Annex 7 provides recommendations on how to identify and work with GBV service providers.

Where appropriate, in Substantial and High-risk projects, the project team 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, psychosocial support, police support and security, access to legal services, and shelter, if needed.⁹ When identifying GBV service providers, the quality of service provision should be a key consideration.¹⁰ To maximize access to all appropriate services a survivor of GBV 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.

⁹ For more information on services needed by GBV survivors, see: <http://www.vawgresourceguide.org/overview>

¹⁰ Quality standards for medical care can be found at <https://www.who.int/reproductivehealth/publications/violence/vaw-clinical-handbook/en/>. Additional service standards can be found at: <https://www.unwomen.org/en/digital-library/publications/2015/12/essential-services-package-for-women-and-girls-subject-to-violence>

4.3 Step Three: Legal Documentation and E&S Covenants

At this stage of the process, the borrower and TDB will agree upon and finalize a series of documents that will constitute E&S covenants as they related specifically to prevention, risk mitigation and response to SEA and SH. These documents will include:

- An Environmental and Social Management Plan;
- Standard bidding and procurement documents for use by the borrower that integrate provisions to address SEA and SH;
- An SEA/SH Action Plan.

4.3.1 Environmental and Social Management Plan and Codes of Conduct

The project Environmental and Social Management Plan (ESMP) will define the specific ways that SEA/SH risks are to be addressed by the project in identifying prevention, risk mitigation and response measures, including the development of a SEA/SH Prevention and Response Action Plan (see below). The ESMP is usually included as part of the tender package and thereby forms part of the construction contract. The contractor is expected to reference the project ESMP and align operations accordingly. Where there is an obligation for the contractor to complete their own ESMP (C-ESMP), this must mirror the ESMP. Annex 5 describes the project ESMP and the C-ESMP in relation to SEA/SH and provides recommendations on the C-ESMP.

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. Project-level measures to address SEA/SH risks should consider other ongoing efforts to prevent and respond to GBV in the community more broadly, 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.

The ESMP should include a sample of the Code of Conduct (CoC) that will be used in the project. The CoC clarifies an organization's mission, values and principles, linking them with standards of professional conduct. 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 procurement requirements for CoCs should include provisions for addressing SEA and SH and include prohibitions against sexual activity with anyone under the age of 18. Mistaken belief regarding the age of a child and consent is not a defense for engaging in sexual activity with minors.

The CoC is associated with a SEA/SH Prevention and Response Action Plan (see below), 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 and of SH so that the CoC can be implemented effectively.

A key element of the CoC is the sanctions that may be applied if an employee is confirmed as a SEA or SH perpetrator. The sanctions need to be proportional to the violation. Prior to imposition of sanctions, if a worker raises a credible challenge to an 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;
- 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.

4.3.2 Bidding and Procurement Documents

Embedding SEA and SH requirements in procurement processes is a critical mechanism for emphasizing legal accountability for addressing SEA and SH in TDB-financed projects. Procurement and bidding documents, in which the borrower agrees to apply for international competitive procurement, provide the basis for ensuring that contractors and consultants fulfil their SEA and SH obligations. The requirements to comply are enshrined in the General Investment Agreement Clauses, which hold the client responsible for implementing mitigation and management measures specified in the Social and Environmental Action Plan, including those related to SEA and SH. With regard to procurement, this includes the specification that:

The Client 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.

Recognizing that contracts for works may be initiated even before terms of investment agreements are specified, the Clause of Pre-Investment Agreements notes that TDB will conduct a social and environmental review as part of its overall due diligence at this pre-investment stage, in order to “ensure that the Client conforms to TDB's Social and Environmental, Management System, including related to prevention of sexual exploitation and abuse and sexual harassment in TDB-funded projects.” This includes conformance in relation to procurement.

Bidding (Procurement) Documents

It is important that the bidding documents sufficiently reflect the findings of any ESA, and the requirements of the ESMP, to address SEA and SH risks. The Bank's procurement and bidding

documents provide the framework and contain explanations and notes for including SEA and SH provisions in the procurement documents, through, for example, appropriate specifications in the employer's requirements/TOR.

Bidders are required to include a sample CoC and describe the implementation arrangements for the CoC. A sample COC is available in Annex 3 that may be used as a reference when CoCs are being prepared by borrowers or contractors, or when contractors' CoCs are being evaluated.

It is essential that the Borrower's Procurement Manager or another representative, in coordination with the Borrower's E&S Manager 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 by the borrower 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 ESH 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. Procurement and the E&S manager should work with the Borrower's subcontractors or goods and services providers 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 interim approach would be to have the Borrower adopt a minimum Code of Conduct (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 and/or the 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.
- 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 (or another supervision entity) is satisfied that appropriate measures are in place to address environmental and social, risks and impacts (as defined in the bidding documents). 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.

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 under-pricing or overpricing.

During Bidding

It is essential to draw the attention of bidders to the specific SEA and SH requirements of the project. This can be done for example through market engagement, use of clarifications, and/or during any pre-bid meetings. It is recommended to be as clear as possible regarding the form and nature of the known SEA and 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 borrower or the supervising Engineer;
- That the C-ESMP—including the SEA/SH Prevention and Response Action Plan—may be disclosed on the using all available external communication mechanisms and that the contractor should participate in public consultations at its own expense.

Bidding Evaluation

The specifications or ESMP in bidding documents must include the requirements to respond to particular SEA and 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., a Labor Influx Management Plan).

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.

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

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 or SH, due diligence should be carried out by the borrower to determine whether bidders have learned 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, TDB should review the borrower's assessment and recommendation on next steps and consult with the borrower as necessary as to how to ensure appropriate controls are in place.

4.3.3 SEA/SH Action Plan

For a project's GBV risks to be properly addressed, it is recommended to have an effective "SEA/SH Prevention and Response Action Plan," which outlines:

- How the project will put in place the necessary protocols and mechanisms to address the SEA and SH risks; and
- How to address any SEA or SH allegations that may arise.

A SEA/SH Prevention and Response 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 and industrial agreements.

The borrower is responsible for producing the SEA/SH Prevention and Response 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, should be provided by the contractor and consultants as part of the C-ESMP, where a C-ESMP is necessitated.

The SEA/SH Prevention and Response Action Plan needs to include specific arrangements for the project by which SEA/SH risks will be addressed (see Annex 2 for Recommended SEA and SH Action based on project risk level, and Annex 4 for a template of the Action Plan). This includes considerations such as:

- Awareness raising strategy, which describes how workers and local communities will be sensitized to SEA and SH risks, and 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 and SH to the project Grievance Mechanism (GM) and through other staff-related reporting mechanisms;
- The process for notifying the contractor of allegations and,

- GBV service providers to which SEA and SH survivors will be referred, and the services which will be available.

The SEA/SH Prevention and Response Action Plan should also include an Accountability and Response Framework which details how allegations of SEA/SH will be handled, including investigation procedures and disciplinary action for violation of the CoC by workers. The Accountability and Response Framework should address, 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 and/or SH allegations internally for case accountability;
- A referral pathway to refer survivors to appropriate support services; and
- Procedures that clearly lay out confidentiality requirements and other safety and ethical principles for dealing with cases.

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 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 or other relevant 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.

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 Bank's requirements for large civil require that all contractor 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.

The borrower and/or supervising Engineer should monitor and report to TDB on the effectiveness of the implementation of the SEA/SH Prevention and Response Action Plan to mitigate SEA and SH risks associated with the project. Reporting should be done on a monthly basis (see more on Reporting below in Section 5.2, Table 1: Proposed Reporting of SEA/SH During Implementation).

4.4 Step 4: Project Monitoring

Contractors on civil works projects are typically supervised by a consulting firm on behalf of the borrower. 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.

4.4.1 Supervision Modalities

Effective supervision and oversight of the project's SEA/SH prevention efforts are vital and should be carefully considered during project preparation. As shown in Diagram 2, effective oversight requires various actors: additional actors are needed in high/substantial risk projects. All entities involved—the borrower, supervising Engineer, 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, described further below. All those involved in SEA and SH prevention activities should have appropriate training and skills for the tasks assigned to them.

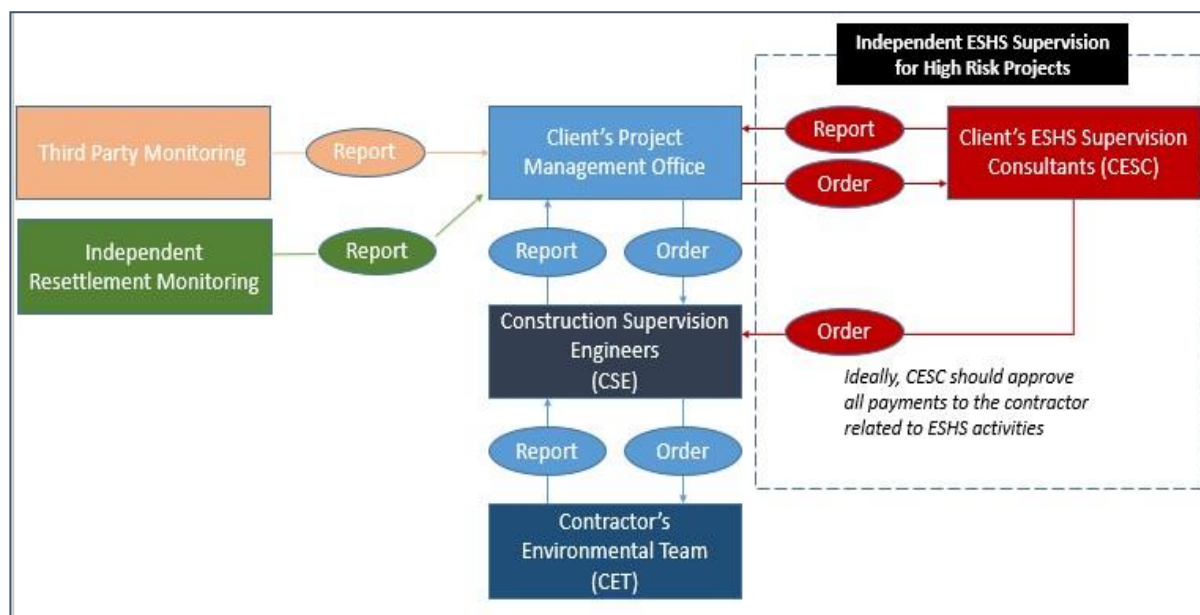


Diagram 2: Sample Supervision and Oversight Modalities for High Risk Projects

4.4.2 Supervising Engineers

Where they are employed, the TOR for the supervising Engineer needs to clearly outline the expectations of their role in ensuring that SEA and 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 and SH- related responsibilities, such as supervising the signing of CoC, verifying that a working GM for SEA and SH, as well as other staff reporting mechanisms for SEA and SH are in place, and that referrals of SEA and SH cases can be made safely and ethically, and working with GBV service providers and entry points into service provision (as required) to raise awareness of reporting processes for SEA and SH. Supervising Engineers also have a role in the resolution of SEA and SH complaints made to the project-related GM or via staff reporting mechanisms, not only for the project but also for ensuring any sanctions on their own staff are applied.

For projects with Substantial and High risk of SEA or SH, it is prudent to require quarterly inspections to monitor the implementation of SEA and 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 SEA/SH specialist; and (iii) the borrower's SEA/SH specialist. The presence of the borrower's SEA/SH specialist—who may in some cases be the project's social specialist—will support the supervising Engineer in assessing whether the necessary SEA and 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 and SH risks.

4.4.3 Borrower's Staffing

It is recommended that the borrower 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 and SH. For projects at Substantial or High risk of SEA or SH, it is recommended for the borrower to have an SEA/SH specialist as part of the safeguard team to ensure SEA and SH-related activities and services are being delivered according to global quality and ethical guidelines.

4.4.4 Independent Monitoring of SEA and SH

If there is a high risk of SEA or SH in a project, independent third-party SEA/SH monitoring is recommended. The Third Party Monitor (TPM) is typically 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. The role of the TPM is not to track, investigate or follow up on individual cases of SEA or SH. The TPM has a higher-level oversight function to confirm that all project actors, including the GBV service provider and the designated SEA and SH focal points or committees to address and resolve SEA and SH complaints, are implementing the SEA/SH Prevention and Response Action Plan. The TPM verifies that the provisions to prevent and respond to SEA and SH are in place and functioning, and also can provide early warning of problems that may surface.

The selection of the TPM 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 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 borrower, who should remit them to relevant personnel at TDB.

The TPM 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 community-based GMs and their reporting mechanisms for staff; and (iii) the successful functioning of the referral pathways and service provision that have been contracted out (in most cases to specialized NGOs working on GBV). In order to ensure that the TPM can independently carry out the above aspects of implementation, it would be preferable that the TPM 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 situations where it may be difficult to find a separate entity to play the TPM role, a service provider, other than a government entity, could also potentially play the TPM role, provided measures are put in place to minimize potential conflicts of interest.

5. COMPLIANCE MONITORING AND REPORTING

It is essential that the project monitor SEA and SH prevention activities. Monitoring and evaluation (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.

5.1 Results Framework Indicators

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

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.

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

5.2 Reporting During Implementation

Projects have a significant role to play in supporting safe spaces for staff to report exposure to SH, and for community members (and other staff members) to report concerns or incidents related to SEA. It should be noted that an increase in the number of reported cases does not necessarily mean that SEA or SH incidents have increased; it can also reflect improved mechanisms for safe and confidential reporting and increased interest awareness of the value of support services. Table 1 proposes the reporting mechanisms for SEA and 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 1: Proposed Reporting of SEA/SH During Implementation

Who	To Whom	What	When	Objective
GM Operator	Borrower (and Borrower to furnish to TDB)	<ul style="list-style-type: none"> Reporting of SEA or SH allegations with four key data: <ul style="list-style-type: none"> Nature of the case; Project-related (Y/N); and Age and/or sex (if available). Whether the survivor was referred to services. 	As soon as becomes known	<p>For Borrower to monitor response.</p> <p>For TDB to report to management in accordance with agreed processes.</p>
GBV Service Provider (contracted to project)	Borrower and supervising Engineer	<p>Aggregate data on case load:</p> <ul style="list-style-type: none"> Number of SEA or SH cases received/referred by the GM or via other referral processes, disaggregated by age and by sex; The number of cases open, and the average time they have been open; and The number of cases closed, and the average time they were open. 	Monthly	To ensure accountability of GBV service provider particularly if financial support is being provided for survivor support.
Supervising Engineer	Borrower	<ul style="list-style-type: none"> Status on the implementation of project's SEA/SH Prevention and Response Action Plan; The agreed project SEA/SH indicators, e.g.: <ul style="list-style-type: none"> 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; That the project-related GM is functioning correctly for receiving and resolving complaints by community members, and that the staff reporting pathways are functioning correctly for receiving concerns about SEA incidents and/or reports of SH; The GM and all other reporting indicators are in place and monitored; and That an appropriate mechanism to resolve SEA/SH complaints is established and functional. 	Monthly	<p>Part of overall</p> <p>supervising Engineer's duty to monitor day-to-day activities and implementation of project's CoC.</p>
Borrower	Bank	<ul style="list-style-type: none"> Project SEA/SH indicators; and GM and other reporting indicators (as supplied by the supervising Engineer) 	In accordance with project legal agreements	In accordance with the standard project Results Framework reporting.
Third Party Monitor (as relevant for high-risk projects)	Borrower	<ul style="list-style-type: none"> The implementation of the SEA/SH Prevention and Response Action Plan; The functioning of an appropriate mechanism to address and resolve SEA/SH complaints; The functioning of the GBV service provider; and The functioning of the GM and any other staff reporting mechanisms, and the status of GM and other reporting indicators related to SEA/SH. 	Yearly	Part of overall duty of Borrower for high-risk projects

Aide Memoires: Aide Memoires should include the data provided by the borrower through the supervising Engineer as well as any information from the TPM.

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.

6. CAPACITY BUILDING AND AWARENESS

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

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

At a minimum, training should include:

- Definitions of SEA and SH, and how the project can induce or exacerbate either and both;
- Roles and responsibilities of actors involved in the project (the standards of conduct for project staff should be captured in the CoC);
- Reporting mechanisms for staff and communities, accountability structures for investigation and disciplinary processes, and safe and ethical referral procedures for survivors;
- Services available for survivors of SEA/SH; and
- Follow-up activities to reinforce training content.

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. The project will also need to train:

- The GM operator on how to handle GBV complaints in a survivor-centered manner; and

- Any focal points that are part of the SEA/SH resolution mechanism will need training on empathetic and non-judgmental listening.

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 Prevention and Response 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) borrower 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 should also be done within the project's adjoining communities.
- **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 and 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.

7. STAKEHOLDER ENGAGEMENT AND GRIEVANCE MECHANISM

7.1 Stakeholder Engagement

Stakeholder engagement is an inclusive process conducted throughout the project life cycle and is important for managing the project's risks. Stakeholders 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-specific considerations for how to appropriately conduct consultations.

Stakeholder guidance should be sought to identify existing and potential local SEA 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 risks and trends in the community.

The TDB E&S team should carefully monitor that effective and inclusive community consultations are undertaken. The consultations are generally organized by the borrower with the support of the supervising engineer's E&S specialists. If the project's needs are very substantial, then an independent consultant to support the borrower with consultations may be a more effective approach. These consultations are needed throughout the life cycle of the project, not just during preparation.

Stakeholder consultations should never directly ask about individual experiences of SEA, or exposure to other forms 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 are:

- Identify the communities adjoining the project and plan stakeholder consultations on this basis.
- Community consultations should be conducted so that those affected by the project are properly informed and can provide their feedback on project design and safeguard 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.

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, including related to SEA;
- The labor influx implications;
- The environmental, social, health and safety (ESHS) and SEA and SH risks that may be associated with the project;
- The employer's (i.e., Government) ESHS policy;
- The CoC standards to be used in the project, with clear communication on what constitutes a violation and how a violation can be reported;
- 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.

It is also recommended that the borrower 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 may be introduced or exacerbated by the project;
- Map services and safe spaces available to survivors of GBV and spaces where GBV is currently reported;
- Identify measures to mitigate project risks.

7.2 Grievance Redress Mechanisms

All Bank-financed projects are required to have a GM. To properly address SEA or 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 Bank's ESMS requires that borrower have a grievance mechanism that will be "proportionate to the potential risks and impacts of the project". This is meant to apply to all aspects of the project. 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.

For both SEA and 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 project staff 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 TDB by service providers and the GM operators. To enable community members and staff persons 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 and SH are:

- The GM is usually operated by the borrower. When there are Substantial or High-risk projects, consideration should be given to a separate SEA/SH GM system, potentially run by a GBV service provider—with feedback to the project GM similar to that for parallel GMs operated by contractors and consultants. The GM operators are to be trained on how to collect SEA and SH cases confidentially and empathetically (with no judgement). See Annex 6 for further details on responding to a complaint.
- Projects must have multiple complaint channels, and these must be trusted by those who need to use them. For communities reporting SEA, this may mean having entry points to the GM at the community level, so that no communities have to go to project offices to report. For staff reporting SEA concerns by other staff members, or SH incidents witnessed or experienced, it may be easier for them to report to a trusted human resources person or other designated SEA/SH focal point within the project.
- Community consultations may be one mechanism to identify effective channels for community members to report SEA (e.g., local community organizations, health providers, etc.) for community reporting, and as noted above, should involve separate and specific consultations with women and older adolescent girls.
- Staff consultations are another important mechanism to identify effective channels for employees to report SEA concerns, or SH incidents witnessed or personally experienced.

- No identifiable information on the survivor should be stored in the GM or any other reporting entry point.
- The GM operator 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);
 - In cases of SEA, to the best of the survivor's knowledge, if the perpetrator was associated with the project;
 - In cases of SEA, if possible, the age and sex of the survivor; and
 - If possible, information on whether the survivor has been referred to or accessed services.
- The GM operator should assist SEA/SH survivors by referring them to GBV service provider(s) as requested by the survivor 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.
- The information in the GM must be confidential—especially when related to the identity of the complainant. For SEA or SH, the GM should primarily serve to: (i) refer complainants to the GBV service provider; and (ii) record resolution of the complaint.

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 further in Annex 6. 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 for experiencing more violence.¹¹

The costs of operating the GM are usually modest and should be financed by the project as part of the general project management costs. The GM should have in place processes to immediately notify both the borrower and TDB of any SEA or SH complaints, with the consent of the survivor. For TDB reporting protocol refer to the Environmental and Social Incident Reporting Mechanism.

¹¹ For more information on GBV data sharing see: <http://www.gbvim.com/gbvims-tools/isp/>.

Annex 1: Glossary of Terms

Child marriage	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).
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 and 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. The SEA and 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.
Sexual exploitation and abuse (SEA)	Sexual exploitation: 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 (UNSG Bulletin). Sexual abuse: actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions (UNSG Bulletin).
Sexual harassment (SH)	Any unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of a sexual nature (UNSG Bulletin).
Survivor-centered approach	The survivor-centered approach is based on a set of principles and skills designed to guide professionals—regardless of their role—in their engagement with survivors (predominantly women and girls but also men and boys) who have experienced sexual or other forms of violence. The survivor-centered approach aims to create a

supportive environment in which the survivor's interests are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor's recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor's capacity to make decisions about possible interventions.

Engineer

(supervising 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".

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 (VAWG) is also used.

Annex 2: Recommended Actions to Address Project-Induced SEA and SH Risk

The table below provides a summary of actions proposed to mitigate SEA and 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 will usually vary by risk. For example, the design of a GM may vary according to the SEA or SH risk.

At the start of project implementation, it is recommended that Borrowers include an escalation clause in the Environmental & Social Commitment Plan (ESCP) should SEA or SH risks become apparent over the course of project implementation, with relevant funding modalities. Borrowers might commit, for example, to hire (additional) GBV service providers should the incidence of SEA or SH create a need for additional support.

Recommended Actions to Address Project Induced SEA/SH Risks



= Actions are recommended given the risk level;











nature of the project and the associated risks;





= Actions that should be considered to be done, and adopted if appropriate, given the

= 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 borrower as to the importance of addressing SEA and SH in the project, and the mechanisms that will be implemented.	oPreparation. oImplementation.	oTDB E&S Team.	oTDB team to monitor and provide additional guidance as necessary.				
	Include in the project's social assessment an assessment of the underlying SEA and SH risks 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.	oPreparation. o Implementation (before civil works commence).	o Borrower for social assessment and ESMP. o Contractor for C- ESMP.	o Ongoing review during implementation support missions. o Update project ESMP and C-ESMP if risk situation changes.				









When SEA/SH	Action to Address Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by SEA/SH Risk Level			
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					Low	Moderate	Substantial	High
	Map out GBV prevention and response actors in communities adjoining the project. ²⁶ This should incorporate an assessment of the capabilities of the service providers to provide quality survivor-centred services, including GBV case management, acting as a victim advocate, providing referral services to link to other services not provided by the organization itself.	oPreparation. oImplementation.	oBorrower with GBV consultant	oUpdate mapping as appropriate.				
	Are SEA and SH risks adequately reflected in all E&S project documentation (i.e., Project ESMP, C-ESMP). Include the GBV service provider mapping in these instruments.	oPreparation. oImplementation (before civil works commence).	o Borrower for social assessment and ESMP. o Contractor for C- ESMP.	o Ongoing review during implementation support missions. Update project ESMP and C-ESMP if risk situation changes.				

Develop a SEA/SH Prevention and Response Action Plan including an Accountability and Response Framework as part of the ESMP. The contractor/consultant's response to these requirements will be required to be reflected in the C-ESMP.	<ul style="list-style-type: none"> o Preparation. o Implementation (before civil works commence). 	o Borrower	o Ongoing review during implementation.				
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²⁶ A mapping exercise of GBV prevention and response actors should ideally be undertaken at a country level and shared with TDB.





When SEA/SH	Action to Address Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by SEA/SH Risk Level
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					Low	Moderate	Substantial	High
	Review the borrower's capacity to prevent and respond to SEA and SH as part of safeguard preparation .	oPreparation. oImplementation.	oTDB E&S Team	oOngoing review during implementation support missions. Update project ESMP if risk situation changes.				
	As part of the project's stakeholder consultations, property inform those in the community affected by the project of SEA risks and project activities to get their feedback on project design and safeguard 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.	o Consultations need to be throughout the project cycle, not just during preparation.	oBorrower	o Monitoring of implementation of SEP. oOngoing consultations, particularly when C-ESMP is updated.				









Specifically address SEA issues in the SEP 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.	o Consultations need to be throughout the project cycle, not just during preparation.	o Borrower	o Monitoring of implementation of SEP. o Ongoing consultations, particularly when C-ESMP is updated.				
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When SEA/SH	Action to Address Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by SEA/SH Risk Level
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					Low	Moderate	Substantial	High
	Make certain of the availability of an effective GM with multiple channels to initiate a complaint. It should have specific procedures for SEA and SH, including confidential reporting with safe and ethical documenting of SEA and SH cases. Parallel GM outside of the project GM may be warranted for substantial to high risk situations. Additional entry points for staff to report outside of the GM may we warranted.	o Prior to contractor mobilizing.	o Borrower but discussed and agreed upon with the TDB E&S Team.	o Ongoing monitoring and reporting on GM to verify it is working as intended.				
	Ensure borrower has a GBV specialist to support project implementation	o Preparation.	o Borrower	o Ongoing reporting.				





For supervision , have a social /environmental specialist in the supervising Engineer's team with GBV-specific skills to supervise issues related to SEA and SH (e.g. supervise signing of CoCs, verify working GM for SEA and 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.	Borrower	Ongoing reporting.				
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When SEA/SH	Action to Address Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by SEA/SH Risk Level			
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					Low	Moderate	Substantial	High
	Ensure oversight through an independent Third Party Monitoring organization (civil society organization, international or local NGO, academic partner, private sector firm) with experienced GBV staff to monitor implementation of the SEA/SH Prevention and Response Action Plan and ensure all parties are meeting their responsibilities.	oPreparation.	oBorrower	oOngoing reporting.				
	Ensure funding is available for Borrower 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).	oPreparation	oBorrower	oBorrower				

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.	oPreparation.	oTDB E&S Team.	oTDB E&S Team.				
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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	Clearly define the SEA and SH requirements and expectations in the bid documents .	oProcurement.	oBorrower.	o Review by TDB E&S Team.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	Based on the project's needs, define the requirements to be included in the bidding documents for a CoC which addresses SEA and SH .	oProcurement.	oBorrower	oReview by TDB E&S Task Team.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	For National Competitive Bidding (NCB) procurement , consider integrating the International Competitive Bidding (ICB) SPD requirements for addressing SEA/SH risks.	oProcurement.	oBorrower	o Borrower with review by TDB E&S Team.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

	Set out clearly in the procurement documents how adequate SEA and 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).	o Procurement.	o Borrower	o Review by TDB E&S Team.				
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When SEA/SH	Action to Address Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by SEA/SH Risk Level
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					Low	Moderate	Substantial	High
	Clearly explain and define the requirements of the bidders' CoC to bidders before submission of the bids.	oProcurement.	oBorrower	o Review by TDB E&S Team.	✓	✓	✓	✓
	Evaluate the contractor's SEA and SH Accountability and Response Framework 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.	oProcurement.	oBorrower.	o Review by TDB E&S Team.	✗	✓	✓	✓
Implementation	Review project-related ESMP (C-ESMP) to verify that appropriate mitigation actions are included.	oImplementation.	oBorrower	oReview by Borrower. o Review by TDB E&S Task Team.	✓	✓	✓	✓
	Review the GM's reception and processing of complaints, as well as other entry points for reporting , to ensure that the protocols are being followed in a timely manner, referring complaints to an	oImplementation.	oTDB E&S Team. oBorrower	oOngoing reporting. o Monitoring of complaints and their resolution.	✓	✓	✓	✓

	established mechanism to review and address SEA/SH complaints.							
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When SEA/SH	Action to Address Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by SEA/SH Risk Level
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					Low	Moderate	Substantial	High
	Codes of Conduct signed and understood 1) Ensure requirements in CoCs are clearly understood by those signing. o Have CoCs signed by all those with a physical presence at the project site. o Train project staff on the behavior obligations under the CoCs. o Disseminate CoCs (including visual illustrations) and discuss with employees and local communities. o Create an appropriate Accountability and Response Framework.	Initiated prior to contractor mobilization and continued during implementation.	o Contractor, Consultant, Borrower	o Review of SEA/SH risks during project supervision (e.g., Mid-term Review) to assess any changes in risk. o Supervising Engineer reporting that CoCs are signed and that workers have been trained and understand their obligations. ²⁷ o Monitoring of GM for SEA/SH complaints. o Discussion at public consultations.	✓	✓	✓	✓
	Have project workers and local community undergo training on SEA and SH.	Implementation.	o Borrower, Contractors, Consultants.	o Ongoing reporting.	✓	✓	✓	✓
	Undertake regular M&E of progress on SEA and SH prevention and response activities, including reassessment of risks as appropriate.	Implementation.	o Borrower, Contractors, Consultants.	o Monitoring of GM. o Ongoing reporting.	✓	✓	✓	✓

²⁷ 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 SEA/SH	Action to Address 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 project-level activities to reduce SEA and SH risks prior to civil works commencing such as:</p> <ul style="list-style-type: none"> o Have separate, safe and easily accessible facilities for women and men working on the site. Locker rooms and/or latrines should be located in separate areas, well-lit and include the ability to be locked from the inside. o Visibly display signs around the project site (if applicable) that signal to workers and the community that the project site is an area where SEA and SH are prohibited. o As appropriate, ensure public spaces around the project grounds are well-lit. 	<ul style="list-style-type: none"> o Prior to works commencing. 	<ul style="list-style-type: none"> o Contractor (implementation) o Supervising Engineer (supervising/enforcing contract) o TDB E&S Team. 	<ul style="list-style-type: none"> o Ongoing reporting. o Reviews during implementation support missions. 				

Annex 3: Sample Code of Conduct

1. To build a system for SEA and SH risk prevention and mitigation, projects must:
 - a) Have all employees of contractors (including sub-contractors), supervising Engineers and other consultants with a footprint on the ground in the project area sign CoCs;
 - b) Have an effective SEA/SH Prevention and Response 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 signed; and
 - c) As part of the SEA/SH Prevention and Response Action Plan, define accountability and response protocols, which set out the procedures followed for holding individuals accountable and penalizing staff that have violated SEA or SH policies.

Sample 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: labor influx, spread of communicable diseases, Sexual Exploitation and Sexual Abuse (SEA), sexual harassment (SH) in the workplace, 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.

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 and 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, laborers 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:
 - ensuring that workplaces, machinery, equipment and processes under each person's control are safe and without risk to health;
 - wearing required personal protective equipment;
 - using appropriate measures relating to chemical, physical and biological substances and agents; and
 - following applicable emergency operating procedures.
4. report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and serious danger to his/her life or health;
5. treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers or children;
6. not engage in any form of sexual harassment including unwelcome sexual advances, requests for sexual favors, and other unwanted 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. In Bank-financed projects/operations, sexual exploitation occurs when access to or benefit from Bank- financed Goods, Works, Consulting or Non-consulting services is used to extract sexual gain;
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, including (but not limited to)

- Rape, which means physically forced or otherwise coerced penetration—even if slight—of the vagina, anus or mouth with a penis or other body part. It also includes penetration of the vagina or anus with an object. Rape includes marital rape and anal rape/sodomy. The attempt to do so is known as attempted rape. Rape of a person by two or more perpetrators is known as gang rape;
 - Other forms of sexual assault, which means any form of non-consensual sexual contact that does not result in or include penetration. Examples include: attempted rape, as well as unwanted kissing, fondling, or touching of genitalia and buttocks not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage;
9. complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including on health and safety matters, and Sexual Exploitation, and Sexual Abuse (SEA), and on sexual harassment (SH);
 10. report any actual or suspected violations of this Code of Conduct or any rumors thereof, regardless of whether evidence exists to substantiate the violation; and
 11. not retaliate against any person who reports actual or suspected violations of this Code of Conduct, whether to us or the Employer, or who makes use of the [Project 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 SEA or SH, 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 confidential referrals to service providers who 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 with relevant experience in handling gender-based violence] 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): _____

Annex 4: Sample SEA/SH Action Plan Template

Note: The activities identified in this sample action plan are only indicative. Activities should be determined based on the level of risk for the project (see Annex 2).

Project PSEA Action Plan Template

Name of project:

Prepared by:

Level of Risk Identified through Risk Assessment:

Level of Risk Based on Contextual Analysis/Expertise:

	<i>1. Sensitize the IA to the importance of addressing GBV on the project, and the mechanisms that will be implemented.</i>							
	Core Responsibilities	Is this required? Y/N	Steps to be taken to	Timeline for Action	Responsible	Budget	Monitoring	Comments

a)	<p>Training IA/PIU on Sexual harassment and PSEA to include:</p> <ul style="list-style-type: none"> • Accountability and response framework • Responsibilities and reporting • Confidentiality and whistle blower protection clauses 							
	2. Integrate Gender Based Violence (GBV) risk assessment in project's social assessment using the GBV risk assessment tool							
a)	Risk assessment using the GBV risk assessment tool							
	3. Map out GBV prevention and response service providers							
a)	Field visits							

b)	Stakeholder consultations							
c)	Map services for survivors available in the all project area.							
d)	Assess capacity and quality of services and service providers							
	4. Integrate Gender Based Violence (GBV) risk management in project's ESMP and Contractors' ESMP (c-ESMP)							

a)	Incorporate GBV risk in the ESMP and C-ESMP							
b)	Develop GBV response and accountability framework							
c)	Review of C-ESMP							
	5. Review the IA's capacity to prevent and respond to GBV							
a)	Engage GBV Specialist							

b)	Review for attention to PSEA: <ul style="list-style-type: none"> Human resource manuals and staff capacity Existing GBV Policies and procedures Project code of conduct 							
c)	Recruit/train an officer on GBV specific skills to supervise issues related to GBV							
d)	SEA and SH sensitization for community							
e)	Conduct GBV training for project staff							

f)	Develop M&E programme							
	6. Inform project affected communities about GBV risks							
a)	Establish partnerships with CBOs							
b)	Establish community focal point							
c)	Develop information dissemination strategy							
d)	Conduct sensitization meetings							

e)	Develop Stakeholder Engagement Plan for GBV related issues							
	7. GBV sensitive channels for reporting in GRM							
a)	Develop GRM with specific GBV procedures							
b)	Review GRM							
	8. Define and reinforce GBV requirements in procurement processes and contracts							
a)	Incorporate GBV requirements and							

	expectations in the contractor and consultants' contracts							
b)	Allocation of funds for GBV related costs in procurement documents							
f)	Codes of Conduct signed and understood <ul style="list-style-type: none"> Review CoC implementation 							
	9. Separate toilet and shower facilities for men and women and GBV-free signage							
a)	Display signs, posters and pamphlets around the project site that signal to workers and the community that the project site is							

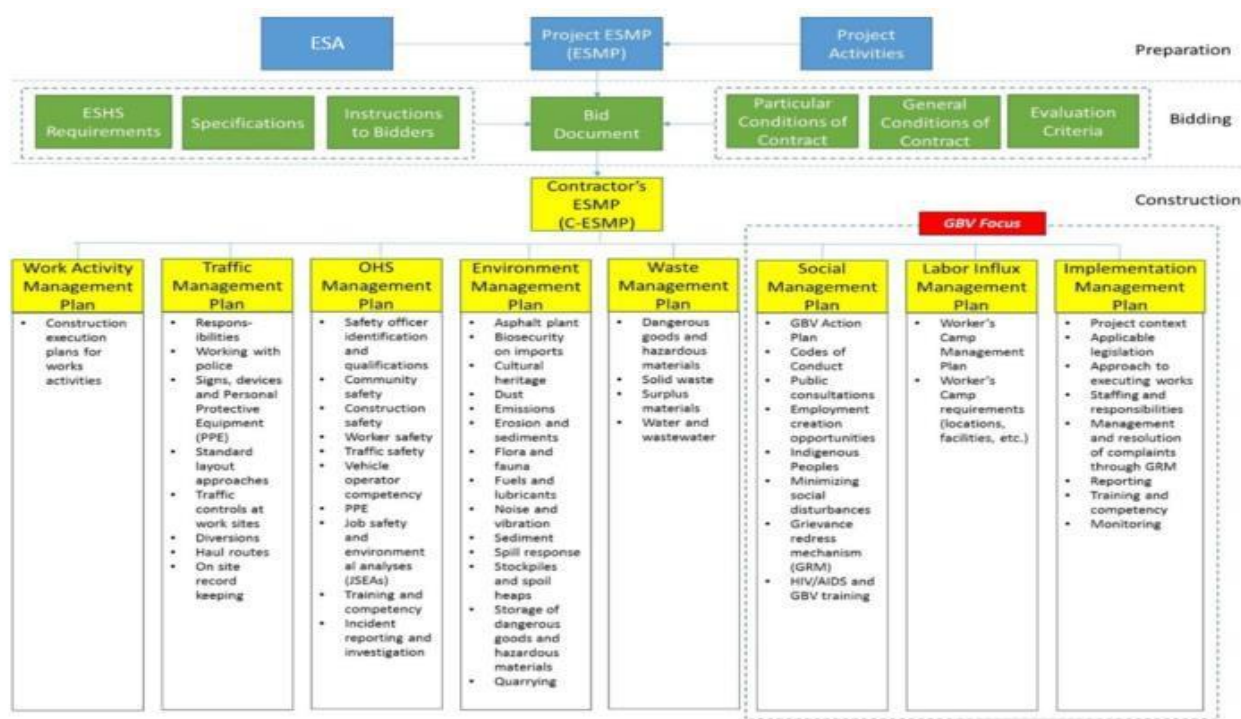
	an area where GBV is prohibited							
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Annex 5: Addressing SEA and SH in the ESMP

The project's ESMP contains elements to address SEA and SH risks. The figure below shows the overall process from preparation through to construction.

During preparation, the ESA (if prepared) and project ESMP are prepared by the Borrower, publicly consulted on, reviewed and cleared by the TDB, and publicly disclosed. The Borrower is required to implement the project ESMP as part of TDB'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.

In the bid for civil works, contractors have to provide a number of management plans and these ultimately become part of the C-ESMP which the contractor must follow during project implementation. The management plans will vary depending upon the nature of the projects, but SEA and SH needs to be included as appropriate.



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 and 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.

The C-ESMP should include:

- Implementation of SEA/SH Prevention and Response Action Plan and Accountability and Response Framework: this is the detailed plan by which the contractor will implement the SEA/SH Prevention and Response Action Plan 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 and 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 and SH risks.

To ensure that the SEA/SH risks are managed, it is important that:

1. 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 safeguard requirements (embodied in the ESMP) and demonstrate that sufficient funds are budgeted for that purpose.
2. 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 borrow pits), unless the supervising Engineer or other relevant project manager is satisfied that appropriate measures are in place to address SEA and SH risks and impacts through the C-ESMP.
3. Public consultations be held on the C-ESMP, with the active participation of the contractor and the supervising Engineer's E&S specialist. These consultations must be well documented and include separate consultations with women and girls.
4. Employee consultations be held on the CoC and staff reporting, with the active participation of the contractor and the supervising Engineer's E&S specialists. These consultations must be well-documented and include separate consultations with female staff persons.
5. 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.
6. The C-ESMP be publicly disclosed on the Borrower's project web site, and at other local locations.
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 borrower's web site.

Annex 6: Responding to SEA and SH Allegations

A Survivor-Centered Approach

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 or 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.

Confidentiality is essential throughout the process. Otherwise, the survivor risks retaliation and a loss of security.

If the alleged perpetrator is an employee of the contractor, consultant or borrower, to protect the safety of the survivor, and the workplace in general, the borrower, 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 SEA/SH expert and/or 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.

GBV Service Providers

One of the most effective ways of addressing SEA or SH risks and incidences lies in working with GBV service providers and other community-based organizations that are able to support the project in addressing any case of SEA or SH, while also working to proactively prevent such cases.

- **Identifying GBV Service Providers:** All projects are recommended to identify GBV services provider(s)—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 borrower or TDB should undertake a mapping exercise through a portfolio approach that identifies qualified GBV service providers, NGOs and community-based organizations in communities adjoining the project. 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 TDB and the borrower, 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.
- **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 borrower 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.

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), 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/>.

It is important that the GBV service providers understand their legal obligations, the legal limits of confidentiality, as well as their professional codes of practice, particularly when it comes to reporting SEA or SH cases to the police. The World Health Organization (WHO) does not recommend mandatory reporting of GBV to the police but if a country's legislation requires mandatory reporting, the GBV service provider should inform the borrower and the potential survivor of this obligation, as well as of any other limits of confidentiality.

Handling SEA/SH Complaints

All projects need to have a framework for properly handling SEA and SH allegations, which should be outlined in the Accountability and Response Framework. There are at least three key actors involved in handling SEA and SH allegations: (i) the GM operator; (ii) the GBV service provider and (iii) the representative of the borrower. It is therefore essential that prior to SEA or 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 and SH. Teams may therefore need to identify alternate channels for reporting, such as the GBV service provider.

The borrower should establish the Accountability and Response Framework for resolving SEA and 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-centred 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 to address and resolve SEA or SH-related complaints and wherever possible a dedicated focal point from the GBV service provider should be part of the resolution process.

The process for addressing complaints would typically be along the following lines (also see Section 7.2 on GMs for SEA/SH).

- The GM operator will keep SEA and 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.
- 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.
- If requested by the borrower (and agreed by the survivor), a survivor's representative/advocate from the GBV service provider will participate in the SEA or 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.
- As part of the established resolution mechanism, SEA and SH allegations are considered and assessed, paying attention to due process for all involved. 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 borrower is tasked with implementing the agreed-upon plan, which should always be in accordance with local legislation, the employment contract and the CoC.
- Through the GBV service provider, the SEA or SH resolution mechanism advises the GM operator that the case has been resolved, and it will then be closed in the GM.
- The borrower and TDB will be notified that the case is closed.

As noted earlier, the GBV service provider and borrower representatives involved in the SEA or SH case resolution, **need to understand their legal obligations when it comes to reporting SEA or 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

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. Any survivor reporting GBV through a reporting mechanism in a TDB-funded project 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 and 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.

With regard to the support given to the survivor by the GBV service provider, under the survivor-centred approach the case is only closed when the survivor no longer requires support.

Reporting to Management

Any case on SEA or SH received by the GM is expected to be reported to the borrower within 24 to 48 hours of receiving, and the borrower is expected to report to TDB within the same time period. The information required to meaningfully report to management on SEA and SH cases should come from the monitoring of cases of SEA and SH in the GM and by reviewing regular supervising Engineer's and/or borrower's reports. Borrowers should include key data on SEA and SH in the Aide-Memoires and Implementation Status Reports.

Resolving and Closing a Case

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 or SH resolution mechanism; and
- The support that the survivor receives from the GBV service provider.

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.
- When the survivor proceeds with the complaint, the case is reviewed through the established SEA or SH resolution mechanism and a course of action is agreed upon; the appropriate party who employs the perpetrator (i.e., the contractor, consultant, or borrower) takes the agreed disciplinary action in accordance with local legislation, the employment contract and the CoC. Within the established SEA and SH resolution mechanisms, it is confirmed that the action is appropriate, and the GM is then informed that the case is closed.

All SEA and 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 or 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.

Annex 7: Working with GBV Service Providers

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.

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.

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.

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 groups¹ that may be most susceptible to project-induced GBV, particularly SEA;
- In consultation with the IA, on the basis of the community mapping, identifying the specific SEA/SH prevention activities to be undertaken to address SEA/SH risks (see Chapter 2 for the types of risks to be considered);
- 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).

To contract the GBV service provider, experience has shown that the most effective approach is for the borrower 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.

In High SEA/SH risk contexts, it may be advisable to put a GBV service provider/NGO under contract to the borrower to provide a range of SEA/SH prevention 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 borrower to hire a fulltime GBV specialist to ensure the provisions are being adhered to appropriately.

Additional Resources and Tools

George Washington Women's Institute, 2017. *Gender-based Violence Research, Monitoring and Evaluation with Refugee and Conflict-affected Populations*, <https://globalwomensinstitute.gwu.edu/sites/g/files/zaxdzs1356/f/downloads/Mannual%20and%20Toolkit%20-%20Website.pdf>

Inter-Agency Standing Committee (IASC) (2015). Guidelines for Integrating Gender-Based Violence Interventions in Humanitarian Action: Reducing risk, promoting resilience and aiding recovery. https://gbvguidelines.org/wp/wp-content/uploads/2015/09/2015-IASC-Gender-based-Violence-Guidelines_lo-res.pdf

Safeguarding Resource and Support Hub:
<https://safeguardingsupporthub.org/documents>

United Nations PSEA Task Force Resource Site:
<http://pseataaskforce.org/en/>

United Nations Secretary-General's Bulletin on "Special measures for protection from sexual exploitation and sexual abuse" (ST/SGB/2003/13), 9 October 2003

World Bank (2019). Good Practice Note – Addressing SEA/SH in IPF Involving Major Civil Works. The World Bank, Washington, D.C.
<http://pubdocs.worldbank.org/en/632511583165318586/ESF-GPN-SEASH-in-major-civil-works.pdf>

World Bank (2014b). Interventions to Prevent or Reduce Violence Against Women and Girls: A Systematic Review of Reviews. The World Bank, Washington, D.C.
<http://documents.worldbank.org/curated/en/700731468149970518/Interventions-to-prevent-or-reduce-violence-against-women-and-girls-a-systematic-review-of-reviews>

World Bank (2016a). Managing the Risks of Adverse Impacts on Communities from Temporary Project Induced Labor Influx. The World Bank, Washington, D.C.
<http://pubdocs.worldbank.org/en/497851495202591233/Managing-Risk-of-Adverse-impact-from-project-labor-influx.pdf>

