



# Food System Resilience Program

## GBV/SEA/SH Prevention and Response Action Plan

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**LIST OF ACRONYMS**

<b>Acronym</b>	<b>Meaning</b>
CoC	Code of Conduct
CSO	Civil Society Organization
ESS	Environmental and Social Standards
GBV	Gender Based Violence
GPN	Good Practice Note
GR	Grievance Resolution
GM	Grievance Mechanism
IPF	Investment Project Financing
MDAs	Ministries, Departments and Agencies
M&E	Monitoring and Evaluation
NGO	Non-Governmental Organization
PWD	People Living with Disabilities
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SP	Social Protection
UNSCR	United Nations Security Council Resolution
WHO	World Health Organization
AF	Additional Finance
GAFSP	Global Agriculture and Food Security Program
CERC	Contingency Emergency Response Component
SLMet	Sierra Leone Meteorological Agency

## EXECUTIVE SUMMARY

This action plan provides a background information to the project, stating the project objective and geographical coverage and summarizing the project component activities and implementation arrangement.

A brief explanation of some key concepts such as gender-based violence, sexual harassment, sexual exploitation and abuse, youth, and people living with disability (PWD) around which activities in the action plan are developed has been provided.

The action plan has been developed in line with the national laws of Sierra Leone, and international policies, conventions and acts. National legal and policy documents which informed the formulation process include the 1991 Constitution of Sierra Leone – sections that guarantee human rights, security and promote freedom from violence and abuse; the national youth policy which seeks to promote widespread action on youth development; national strategy for response to sexual and gender-based violence; as well as domestic violence, sexual offences, registration of customary marriage and divorce, and gender equality and women empowerment acts.

International admonition and best practice guidelines were obtained from ILO Convection on Harassment (ILO C190) which aims to eliminate workplace violence and harassment and redefines a future of conducive work environment; the Child Right Act of 2007 which identifies the rights and responsibilities of children and protects them from being dehumanized and violated, the Anti Human Trafficking Act of 2007 which criminalizes the use of human transaction through movements for individual financial, material and other gains, the Convention on the Elimination of All forms of Discrimination Against Women; and the Beijing platform for action which advances women’s rights and gender equality world-wide.

Relevant World Bank environmental and social standards (ESSs), good practice/technical notes that ensure sustainable, non-discriminatory, transparent, participatory, environmentally, and socially accountable project implementation while assuring effective management of GBV/SEA/SH issues were consulted.

The action plan elaborates on anticipated project related GBV/SEA/SH risks as well as specific factors that may precipitate the anticipated risks. Guiding principles and code of conduct with accompanying sanctions that guarantee the safety, security respect for all persons, ensuring well-being of project staff, service providers, beneficiaries and other stakeholders, and facilitate effective management reporting and management of GBV/SEA/SH cases have also been defined in the action plan.

A background to the developed Project Grievance Redress Mechanism outlining the channels for receiving project related grievances and steps for case resolution and closure have been provided in this document. Similarly, GBV/SEA/SH allegations uptake as well as other steps and protocols for referring, redressing, monitoring and closing such allegations are detailed out in the action plan.

Embodied in the action plan is an implementation framework defining institutional structures, designated personnel and other stakeholders with roles and responsibilities at different levels to ensure GBV/SEA/SH, prevention/mitigation and survivor support.

Complementary actions such as awareness arising and community stakeholder's engagements; development and dissemination of IE&C materials on GBV/SEA/SH; publication of available services in project communities; training and capacity building for key project actors; effective collaboration, networking and communication with stakeholders; monitoring, knowledge management and reporting which are important elements and provide the enabling environment for implementation of the action plan have been emphasized.

Highlighted in this regard also is the role of a dedicated non-governmental entity and other complementary GBV/SEA/SH service providers in consonance with the chosen Model 3 of the World Bank technical note on Grievance Mechanisms for Sexual Exploitation and Abuse & Sexual Harassment. The central thrust of this model is the outsourcing of key GBV/SEA/SH case management functions to a dedicated non-governmental entity with expertise in GBV/SEA/SH. The dedicated entity will develop methodology and tools, deliver results in the GBV/SEA/SH case management value chain of case uptake; sorting and processing acknowledging and follow-up; verifying, investigating and acting; monitoring and evaluating; providing feedback to survivors; and reporting to the project.

In the spectrum of the operations of the entity as well as other actors in the GBV/SEA/SH case management, survivor-centered protocols such as confidentiality, anonymity, survivor-consent, and protection of survivors from stigmatization and reprisal will be respected.

The action plan culminates in described project activities with accompanying risks, prescribed mitigating for the risks, responsible parties for implementing the mitigation measures over defined timelines and provisional budgets for effecting the measures. Also featured in the roadmap are indicators for measuring the achievement of the measures reflecting the risks associated with the project activities.

## 1.0 INTRODUCTION

The Government of Sierra Leone with support from the World Bank is implementing the West Africa Food System Resilience Program. This project seeks to contribute to the prevention of food insecurity and crisis in the sub region, reduce vulnerability to climate change, strengthen local institutions, improve economic opportunities, build public trust, and strengthen regional food and nutrition security in the sub region. In its implementation one of the key considerations are issues surrounding GBV/SEA/SH - its prevention, response and adherence to guiding principles.

This GBV/SEA/SH Action Plan is a roadmap that the FSRP 2 will during implementation of the project focus on with interest on how to mitigate and or provide services to survivors and recommendations to relevant service providers. It adopts an approach that considers the climate around GBV as well as SEA/ SH in workplaces and beneficiary communities and aims to include appropriate policies and codes of conduct that must be implemented together with training and awareness raising programs to address and prevent the occurrence of these socio-economic woes.

The importance of GBV/SEA/SH action plan in the FSRP 2 is to eliminate all related sexual violence and promote safe working environment for all project staff, implementing partners and beneficiary in an orderly and comprehensive manner using an inter-divisional, inter sectoral and community-based approach for the successful implementation of the FSRP 2. It also ensures that no discrimination against persons either because of their gender, age, social status, and physical conditions are left out of the project delivery processes. It also ensure unconditional access to benefits and a formidable linkage between the PIU and the relevant service providers for reporting, recording, safe keeping and confidentiality based on ethical principles surrounding GBV and sensitive SEA/SH issues: be they in the areas of appropriate care and services to survivors of GBV/SEA/SH, provision of productive resources, legal assistance to mention but a few are readily made available in project operational communities to swiftly address any of gender related discrimination and abuse. To achieve these, the project must allow several but safe and credible entry points accessible to especially women, youths and physically challenged: starting with the PIU and cascading right across project operational communities.

The additional finance support from the AF 1 (CERC) is geared towards effective implementation of component 4 in responds to GoSL's request to address the short- and medium-term implications of the global food, fertilizer, environment and fuel price crisis for the country by improving access to food and strengthening agricultural production,

particularly for food insecure districts and smallholders. This component proposes to meet the immediate food and nutrition needs of acutely food insecure agricultural households and communities identified for support through the Government-led targeting process. With the (GAFSP), since Sierra Leone is chronically food insecure, experiencing recurrent episodes of acute need: Ebola, mudslides, flooding and climate variability which is affecting our dependent on rainfed agriculture. This has led to a low rating on the Global Hunger Index recording levels of hunger considered “serious” or “alarming”, especially over the past decade. Food insecurity and malnutrition are currently worsening in Sierra Leone, and due to these concerns, the World Bank approved the GAPSE. With these additional finances risks of Gender Base Violence (GBV) and violence/exploitation of children and persons with disabilities, specifically related to food distribution under both the AF1 and AF2. GBV risk assessment will also be re-evaluated during implementation to consider these new activities, and update to the SEA/SH Mitigation and Response Action Plan to incorporate additional issues relating to prevention/mitigation and case management of project related SEA/SH cases among beneficiaries, service providers, and implementing partners and even project management staff, including measures related to mitigating SEA/SH risks to children/youths and persons with disabilities under the school feeding activity, cash transfers, and access to project related facilities and services.

With these there will be additional support for more food resilience activities, implementation of which has the likelihood for increased SEA/SH related risks in the overall project context. Thus, the need for increased financing for interventions/activities to prevent or mitigate the incidences of GBV/SEA/SH in the domains of Program Management and Service delivery and these must be earnestly addressed. Appropriate interventions will include sensitization and education of stakeholders on GBV/SEA/SH issues to raise their awareness, deepen their knowledge and propel them to act; effective enforcement of adherence of GBV/SEA/SH related code of conduct by program management staff and service providers; building capacity and supporting non-governmental service providers to address the needs of GBV/SEA/SH survivors and bringing perpetrators to book.

## **2.0 PROJECT DESCRIPTION**

At the national level, the project will directly benefit 266,200 farming households, with impact on 943,200 direct beneficiaries, of which at least 45 percent (424,440) will be women, 40 percent (377,280) youth, and 5 percent (47,160) vulnerable groups, including



people with disabilities. Of the total number of beneficiaries (182,000), t During project inception phase, analysis was done to identify barriers and entry points for gender and social inclusion. In addition to gender and youth empowerment being mainstreamed across all interventions in response to analysis conducted at the project appraisal stage, the project will also implement specific activities that target women and youth groups across all components of the project. The project will also benefit institutions involved in the Food and Nutrition Security, Early Warning System (FNSEWS) in the form of training, infrastructure support, relevant equipment, and operational costs. The project aims to also strengthen private sector actors involved in the three selected value chains (rice, cassava, and livestock). These private sector actors will benefit from capacity building and business opportunities through matching grant arrangements. Appropriate beneficiary selection criteria will be developed to ensure that all interventions reach the most marginalized persons in the community; conform to environmental and social safeguard protocols and benefiting private sector actors meet high performing standards. Other benefiting entities will include Farmers' Associations, the Sierra Leone Agricultural Research Institute (SLARI), Njala University (NU), agribusinesses and other public and private sector institutions.

This project will be implemented in the fifteen (agricultural) out of the sixteen districts in Sierra Leone. However, for respective value chains, the following districts will be mainly targeted:

- i. **Rice**: Bonthe, Port Loko, Tonkolili, Bo, Kenema and Kambia
- ii. **Cassava**: Bonthe, Bo, Moyamba and Pujehun
- iii. **Livestock**: Bo, Moyamba, Koinadugu, Falaba/ Large Ruminants: Koinadugu,

**The Project Development Objective (PDO)** which is “to increase preparedness against food insecurity and improve the resilience of food system in Sierra Leone” **will be achieved through the following five components:**

**Component 1: Digital Advisory Services for Agriculture and Food Crisis Prevention & Management**

This component seeks to take advantage of new information technologies, data sources and service delivery models involving the private sector to provide digital advisory services to address the multi-dimensional nature of Food Security. This component has two subcomponents:

**Sub-Component 1.1** - Upgrading Food Crisis Prevention & Monitoring Systems (to be implemented at the regional level); and 1.2 - Strengthening Creation and Provision of Digital Advisory Services for Farmers which is to be implemented at the country/national level.

**Sub-component 1.2** - Strengthening Creation and Provision of Digital Advisory Services for Farmers - seeks to increase access to and use of location-specific information relevant to food security by decision makers and farmers via national extension systems. Subcomponent activities will include: (i) capacity building and institutional strengthening activities for hydromet and agromet service providers (public & private) at the national level; (ii) enhancing the national capability to observe hydromet phenomena to supplement regional and global weather data and infrastructure; (iii) development and provision of impact-based forecasting, warning and advisory services to respond to the demands of the agriculture and food security; (vi) support the timely delivery of agro-meteorological information to farmers using multi-modal channels including ICT in partnership with the private sector (telephone companies, agro-dealers, service providers) and civil societies; and (v) support to the development of climate information that can better inform the development of agriculture and risk financing instruments (emergency funds, insurance, derivatives, contingency loans) and cross-border counter cyclical farmer support measures.

## **Component 2: Sustainability & Adaptive Capacity of the Food System's Productive Base**

This component targets the resilience of agro-sylvo-pastoral production systems allowing small and medium producers, especially women and youth, to sustainably meet their nutritional needs and raise incomes from the sale of surpluses in local and regional markets. This would be achieved through: (i) adapting and adopting technologies, innovation, and knowledge to counter the evolving challenges of the food system; and (ii) building resilience in food insecurity priority areas through multi-sectoral interventions including better access to innovation and technologies. The component activities are structured within two subcomponents, including 2.1: Adapting and adopting Innovations and Technologies for Resilient Food Systems (to be implemented at the regional level); and 2.2: Strengthen food security through sustainable practices in targeted areas (to be implemented at the country/national level).

The sub-component 2.2 - Strengthen food security through sustainable practices in targeted areas - which will be implemented at the national level, aims at sustainably improving rural households' food security and their resilience to climate variability in targeted areas. The interventions will cover specific themes including (i) land and

watershed restoration; (ii) floodplains restoration; (iii) water mobilization and irrigation development; and (iv) delivery of farm/community level CSA packages of technologies.

### **Component 3: Market Integration & Trade:**

The component's objective is to expand food trade in West Africa to enable an effective distribution of surplus produce to deficit regions and facilitate production and commercialization of agricultural inputs and technologies within and across national borders. This would be achieved through attracting private investment along the region's priority value chains. The two subcomponents into which the component activities are structured include 3.1 - Facilitate Trade across Key Corridors and Consolidate Food Reserve System (to be implemented at the regional level); and 3.2 - Support to Development of Strategic Value chains with incorporation of information obtained from comprehensive gender analysis (to be implemented at the country/national level).

Under sub-component 3.2 - Support to Development of Strategic Value chains - the project would support the development of up to three value chains, focusing on backward and forward segments of priority staple crops and short cycle livestock value chains, with the potential for tangible positive impacts on regional food security.

### **Component 4: Contingent Emergency Response Component**

The objective of this component is to make resources available to strengthen the response capacity of the Government in case of emergency situations sparked by natural disasters (pests, droughts and floods, pandemic outbreak, etc.) through a synergy of actions. The CERC has been activated under the Crisis Response Window (CRW), which is the AF 1 of the FSRP. The following interventions are supported under this component through the AF1 with defined specific objectives:

To meet the immediate food security needs of vulnerable groups, over a period of 3-6 months:

- i. **Provide food and nutrition assistance to vulnerable households based on fair GBV/SEA/SH sensitive distribution criteria.** Some 20,000-crisis affected vulnerable farm households (approximately 100,000 people) will receive three (3) months of cash transfers. Of these, 75 percent of beneficiaries will be female-headed households. The cash transfer activity will be implemented by the Social Safety Net Project coordinated through the National Commission for Social Action (NaCSA) using existing cash transfer systems (targeting, value provision, and administrative infrastructure). The cash transfers will be based on criteria such as equity, needs, non-discriminatory and unconditional equal access. To ensure a coordinated response to the high fuel and food price crisis, NaCSA will implement

this program in coordination with WFP and other partners of national food security and early warning system. Through this scheme, the project will reach to help them meet their immediate food and nutrition needs and minimize the impact on their livelihoods.

- ii. **Provide cash for work to support local food production.** 8,700 smallholder farming households within 158 Farmer Based Organizations will be provided with 60 days of employment in public works, focusing on rehabilitation of critical agricultural infrastructure, particularly that affected by recent floods, including 1,300 hectares of IVS.<sup>1</sup> The program will have two layers of targeting: (a) geographic according to the level of food insecurity in districts; and (b) at the household level, self-targeting of the poor within food insecure communities. The wage rate will be no higher than the market wage for unskilled labor (agricultural daily wage) in different locations. Under this activity, the project with technical support from WFP will also support: (i) deploying 40 power tillers to high performing groups to mechanize land preparation; (ii) fencing 50 hectares of IVS in Falaba district to mitigate conflicts between crop farmers and cattle herders; (iii) upgrading of 15 Farmer based organization (FBO) stores and rehabilitation/construction of 15 drying floors to improve post-harvest management; and (iv) restoring degraded water catchment areas through planting 25,000 economic trees.
- iii. **Support school feeding to prevent the deterioration of nutrition status of children.** The AF will support school feeding in crisis affected districts to enhance nutritional levels of the children from deprived homes. WFP will be the main implementing partner, working in close partnership with the School Feeding Secretariat which is responsible coordination, quality assurance, monitoring, and reporting. WFP will procure and deliver in-kind food assistance to 120,000 children attending public primary schools in 34 chiefdoms in Karene, Kenema and Bonthe districts, shown to be among the most food insecure by the 2020 *Comprehensive Food Security and Vulnerability Analysis*. All actors involved in the school feeding program (WFP) – for in-kind food assistance; School Feeding Secretariat - for provision of coordination, oversight, monitoring and reporting responsibilities; School Management Authorities – for ensuring adequate and quality food and report on activities of caterers; Caterers - for facility level preparation and service of quality and adequate food to school children) – will

sign and adhere to the project code of conduct for service providers. The code of conduct, among other things will ensure fair distribution of benefits and protection against SEA/SH. With this support, targeted schools will prepare and serve daily hot meals, ensuring that they meet 30 percent of their daily nutritional needs, increasing attendance, retention, and educational attainment. The program will finance WFP to procure 320 Metric Tons (MT) of rice locally for the first term, and 1,400 MT internationally for the second and third term. Some 420 MT of pulses, 140 MT of vitamin-A fortified vegetable oil, and 70 MT of iodized salt will be procured internationally.

**To boost local production of a diversified basket of food**, over a period of 24-36 months, the project will:

- i. **Finance procurement of agricultural planting materials and inputs, organize advisory services and technical training to restore the productive capacities of crisis affected farm households.** Some 30,000 farming households will be supported, focusing on improved tolerance to climate-related stress and short duration crops to maximize the 2022/2023 cropping season. The beneficiaries will include about 3,000 recent flood affected households. The intervention will support the delivery of 4,000 tons of fertilizers and soil amendments and 3,000 tons of improved short duration seeds, as technology packages, to cultivate 30,000ha of priority crops (particularly rice) through the e-Voucher scheme. Crisis affected farmers will be supported to cultivate 10,000 ha of bio-fortified cassava and orange flesh sweet potato varieties. The AF will also finance expanded access to mechanization services for land preparation and harvesting, through machine ring operators, as well as other production support services, including support for agricultural extension services (using the e-extension platform where accessible). The delivery of high-yielding short-duration varieties of target crops would help farmers to take advantage of rains and residual moisture in the floodplains in raising a successful second crop. This will help restore productive capacity, boost crop yields, and improve food security in the medium-term.
- ii. **Promote the cultivation of high nutrient crops such as legumes (groundnut, cowpeas, and soybeans) and vegetables in crisis-affected communities,** particularly those severely affected by recent floods. Beneficiary farming households and FBOs will be supported with simple tools for land preparation, and technology packages comprising early maturing seeds, and organic and inorganic fertilizers and pesticides, aiming to cultivate 850 ha of groundnuts, 155

ha of soybeans, 400 ha of cowpeas, and 2,000 ha of vegetables. 2 tons of assorted onion and vegetable seeds will be procured, in addition to some 2,000 tons of dung through local service providers. Five (5) solar water irrigation pumps for large-scale vegetable production during the dry season will be installed, focusing on the production of onions and other assorted vegetables through female farmer groups. With technical assistance from FAO, the project will finance: (i) training in climate smart practices including organic production system and integrated pest management systems and strategies; (ii) capacity strengthening of farmers, marketing cooperatives, and aggregators to foster linkages among value chain actors and smoothen markets, through establishing two regional agricultural business platforms to bring together smallholders and the private sector; and (iii) nutrition education to improve production and consumption diversification.

**To create and rehabilitate resilience-enhancing productive assets**, over a period of 24-36 months, the project will:

- i Provide targeted beneficiaries in food insecure districts with grants to acquire assets such as labor-saving small farm implements and tools to enhance productivity, and in-kind support to own and rear livestock as sources of alternative livelihoods. The sub-component will emphasize the integration of climate-smart practices across the supported interventions to ensure sustainability and build climate resilience. With technical assistance from FAO, the project will support vulnerable farm households in short cycle livestock production, particularly in backyard poultry, small ruminants (sheep and goats), piggery and aquaculture production. These will internalize previous lessons learned and be provided as in-kind support to broaden income sources of the farm household, improve capacity to manage shocks and improve household nutrition. This will include support to produce 250,000 six-weeks-old chicks of improved breeds of cockerels to benefit 5,000 farm households for backyard poultry that would also improve local breeds. About 8,000 small ruminants (sheep and goats) with improved climate-resilient breeds will be procured and distributed to 2,500 vulnerable farm households, who, in turn, will be required to pass on the progeny as gifts to subsequent sets of beneficiary households. Beneficiaries will also receive technical assistance to construct appropriate housing for the livestock and support initial feed needs (20 tons) and veterinary products aimed at improving livestock health and husbandry.

### **Sub-Component 4.1: Support to Implement Government’s Quick Action Food Security Response Plan**

The reallocation into this new sub-component responds to GoSL’s request for the activation of the CERC to address the short- and medium-term implications of the global food, fertilizer, and fuel price crisis for the country by improving access to food and strengthening agricultural production, particularly for food insecure districts and smallholders. This subcomponent proposes to meet the immediate food and nutrition needs of acutely food insecure agricultural households and communities identified for support through the Government-led targeting process.

### **Component 5: Project Management**

This component would finance project management costs of the PIU to be established within the National Development Partner Project Coordinating Office (NDPPCO) for staffing, monitoring, and evaluation, including project technical audits (as needed) and mid-term and end-project evaluations, safeguards, financial management, procurement, and training as well as cover any costs related to the setup of a grievance redress mechanism. The component will also support advocacy, knowledge exchange and partnerships for sustainable agriculture and food systems resilience.

### **The GAFSP Additional Financing**

The program has also received additional funding through the Global Agriculture and Food Security Program (GAFSP) to scale interventions mainly under component 2 with little administrative support under component 5 of the FSRP. The Program Development Objective of the main FSRP is maintained for this AF. Interventions are supported to be implemented in six selected districts (Pujehun, Moyamba, Port-Loko, Tonkolili, Kambia, Koinandugu), focusing on vulnerable households and communities. See details of the planned interventions below:

**Subcomponent 2.1: Consolidate Regional Agricultural Innovation System** –Under this sub-component, the GAFSP grant will fund the scale-up of interventions to enhance the delivery of agricultural extension services to farmers and other economic operators in the agricultural value chains. This activity will contribute to the strengthening of the agricultural extension system with additional equipment and staff training to enhance the capacity of the Ministry of Agriculture and Food Security (MAFS) to deliver extension services. It will (i) support the review and strengthening of the current extension system

to enhance extension service delivery through the use of digital platforms, with private sector participation, to significantly increase the reach, impact and cost effectiveness of the county's extension system; (ii) expand the space for innovative technologies and digital techniques in the delivery of agricultural advisory and other services; (iii) support the operational needs of the field extension staff through skills development, provision of relevant technology and digital tools; (iv) promote private sector participation in the delivery and operation of the recently launched MAFS e-extension system to ensure sustainability; and (v) provide logistical and mobility support (like motorbikes) to frontline extension staff to enhance field operation and monitoring. The core beneficiaries of this sub-component will be the extension staff of MAFS at national and district level, private service providers and farmer-led facilitators.

**Key Activities:** To deliver this sub-component, the following scale-up activities will be financed: (i) further develop and regularly update agricultural extension portal to which the farmer knowledge library (Interactive Voice Response (IVR) system) and the Call Center (operated at MAFS) will be linked. The e-extension portal will digitize and store all extension messages and information for easy access, including producing and disseminating documentary videos of improved agricultural practices and technologies; (ii) provide Technical Assistance in reforming agricultural advisory practices towards greater use of digital systems; (iii) provide training to district extension staff and specialists on extension services to farmers and monitoring of field-based production activities using appropriate digital systems and tools; (iv) provide support for the training of farmer-based facilitators on new extension tools; (v) procure electronic devices to support data collection, reporting, and knowledge management and dissemination; (vi) support the operationalization of the MAFS e-extension system, as a key extension delivery tool, through the provision of training on effective farmer engagement, provision of smart android devices for call response, and the provision of incentives for IVR and Call Center operators (especially the volunteers until MAFS finalize the regularization of their employment by GoSL); (vii) facilitate engagements with the private sector and Telecoms in leading the delivery, operation and management of the digital tools for sustainability; (viii) support to operationalize the IVR system to provide ready-to-go information to farmers 24/7. This support will include IVR licenses and hosting renewal and maintenance, awareness raising and sensitization through radio adverts and TV talk shows, community meetings, newspapers publications, etc.; and (ix) engage National Federation of Farmers of Sierra Leone (NaFFSL) to work with farmers through the commodity platform approaches for adoption of best farming practices and commitment to improving production.



**Sub-component 2.2: Strengthening Regional Food Security through Integrated Landscape Management (ILM)** - The AF will scale up interventions of the parent project that promote climate-smart and nutrition-sensitive agriculture practices, technologies and interventions. It will scale-up FSRP interventions towards the development of ILM technologies, focusing on communal lands to strengthen the natural resource base in a sustainable way while promoting appropriate climate-smart agricultural practices and technologies in the context of the support for the cultivation of rice, cassava, and vegetables through the supported e-voucher program. This support will increase the target of FSRP's ILM intervention in the IVS by 8,000 ha.

**Key Activities:** To deliver this, the GAFSP AF will provide additional support for financing stakeholder mobilization and awareness raising for participatory integrated communal landscape planning and management, including the establishment, or strengthening of the functioning of local committees to lead the implementation. This will be led by civil society groups/NGOs who will facilitate participatory work for planning on communal land. Foreseen investments include (i) civil works for improved soil and water management (rehabilitation/development of 7,000 ha IVS, lowland and bolilands (seasonal hydromorphic swamps) through the rehabilitation and improvement of weirs, dykes, bunds, water harvesting and erosion control structures, and 1000 ha of small-scale and efficient irrigation systems, etc.) on communal lands (cultivated by smallholders) identified through participatory landscape planning; (ii) training community youth contractors, farmers, and engineering staff in IVS rehabilitation and improved water management practices; (iii) establishing and training Water User Associations (WUAs) and Land User Associations (LUAs) for sustainable management of water catchment and irrigation systems, and lowland ecologies respectively who will ensure that all community members have equal access to the developed lands; (iv) training to major farmers and WUA and LUAs' members on CSA and agronomic practices, and (v) investments in the deployment and adoption of CSA packages that respond to current and projected impacts of climate change and intend to maximize productivity and climate resilience, as well as environmental co-benefits (including greenhouse gas emissions reduction) with focus on improved soil and water management, integrated nutrient management (including preparation and application of organic fertilizers), increased input-use efficiency.

**The GAFSP AF will also augment the productivity enhancing support** to farmers through private sector delivery using the e-voucher system. This includes, inter alia, support for (i) CSA packages such as high-yielding, early-maturing, and drought-resistant, acidity and salinity tolerant genetic material; and (ii) environmentally friendly practices for agricultural intensification including organic fertilizers, liming to minimize

soil acidity and enhance fertilizer use efficiency, training on fertilizer use efficiency, biological plant pest and disease control, etc. The AF will also pilot the improvement of community vegetable gardens (5-10 ha each) into modern community vegetable gardens for vulnerable women (including persons with disability) in 20 vegetable growing areas in the project intervention zone to diversify their production and enhance household incomes and nutrition. Under the community garden scheme, the AF will finance, among others (i) pressurized water management technologies to modernize production systems, with associated investments such as on-farm water storage tanks, on-farm drip or sprinkler irrigation equipment, greenhouse and vertical farming with appropriate digital enhancements, fencing, solar energy system and pumps (to promote green energy use); (ii) training of women vegetable gardeners on modern vegetable farming as well as on the operation and maintenance of the financed irrigation equipment to ensure its sustainability; (iii) training the women groups on business facilitation and market development; and (iv) facilitation of productive partnerships with agribusinesses downstream the vegetables/horticulture value chains to guarantee access to high value vegetable markets. Scaled up private sector investments are expected in areas of the vegetables/horticultural value chains that will enhance the efficient use of the precision irrigation infrastructure, product quality improvement (towards meeting global standards) and in market development. This activity will be implemented with Technical Assistance from FAO, as key implementing partner, in association with business development services providers.

**Moreover, the AF will promote nutrition-sensitive practices** for vulnerable groups through a variety of activities, including the support for training and establishment of homestead/kitchen and community vegetable gardens for a subset of beneficiaries, support to women groups to establish horticulture value chains to expand the supply of nutritious food in the country (as described above), capacity-building in MAFS and other institutions, and information campaigns for rural families to grow, purchase and consume more nutritious food and increase dietary diversity. Prioritized value chains for support under the AF include rice, biofortified cassava, beans (cowpeas), soybeans, groundnuts (peanuts), orange flesh sweet potatoes and vegetables. The sub-component will also support behavioral and communication campaigns for consumer acceptance of nutritious diets, especially the biofortified crops.

**The AF will also finance the increase in the productive capacities of 18,000** eligible vulnerable farmers to enable them to engage in continued production of key staple foods in the short-medium term (6-24 months), to complement the emergency response interventions of FSRP to alleviate the impact of the food crisis in Sierra Leone. The project will finance: (i) procurement and distribution of improved seeds and planting materials,

with a focus on key food crops and vegetables through private sector delivery using e-vouchers cultivate an additional 9,000 ha of land for rice (5,000 ha), bio-fortified cassava (2,000 ha) and sweet potatoes (1,000 ha orange flesh variety) and vegetables (1,000 ha for female producer groups mainly); and (ii) provision of requisite organic inputs (organic fertilizers and bio-pesticides) and advisory services in support of improved productivity and production system resilience to climate change.

## **Project Institutional Arrangements**

***Project Management Unit (PIU)*** – The overall day-to-day management of the project will be carried out by the PIU established within the Ministry of Agriculture and Forestry’s National Development Partners Project Coordinating Office (NDPPCO). The PIU in the NDPPCO shall consist of the following personnel: (i) Project Coordinator, (ii) Financial Management Adviser/Specialist, (iii) Monitoring and Evaluation Specialist, (iv) Procurement Specialist, (v) Data Analyst, and (vi) an Environmental and Social safeguards unit with 3 specialists: an Environmental Specialist, Social Specialist, and Gender Specialist.

***Project Steering Committee (PSC)*** – A Project Steering Committee (NPSC) will be established to provide policy guidance and oversight. The Steering Committee will be responsible for: (i) approving the annual work plans; (ii) approving the annual procurement plan; and (iii) reviewing progress in the implementation of the work plans and other aspects of project performance, including taking responsibility on fiduciary oversight responsibilities; and (iv) ensuring that there is policy and implementation coordination, not only between sub-components of the project but also among all the project implementing institutions. The Minister of Agriculture and Forestry, as the key sector ministry, will chair the NPSC which will comprise relevant officials from the other sector ministries and the state and non-state institutions involved in project implementation.

## **Implementation Arrangements**

Some of the project’s activities will be executed in partnership with public sector implementing agencies. The NDPPCO will sign Memoranda of Understanding and output agreements with those entities as Project Implementation Agencies. Component 1 will be led by the Sierra Leone Meteorological Agency (SLMeT, Component 2 by MAF, Component 3 by the Directorates and agencies under Ministry of Trade and Industry, in partnership with MAFS. Implementation arrangements will be detailed in the PIM.

Additionally, Sierra Leone's culture is male dominated and FSRP beneficiary regions are no exceptions thereby exposing community members further to the risk factor of GBV as communities within these regions are mostly characterized by:

- Wife inheritance to have access to deceased properties, forced and early marriage of girls is a common cultural practice, and that women and girls do not freely participate in public consultations.
- School enrolment and retention rates among girls in target communities are still low due to domestic responsibilities, child marriage, teenage pregnancy, unsafe school environment including sexual harassment (sex for grades) long distances to schools, and lack of sanitation facilities and supplies among other factors up until now that there existing acts and laws which need to be cascaded to rural communities.

### 3.0 DEFINITION OF CONCEPTS

This section provides a brief explanation of some key concepts as they relate to this write up. These include Gender issues, Gender-Based Violence (GBV), Sexual Harassment (SH), Sexual Exploitation and Abuse (SEA), Youth issues, Child, Child Labour, and Persons with disabilities (PWDs).

**Gender Issues:** Gender issues include all aspects and concerns related to women's and men's lives and situation in society, the way they interrelate, their differences in access to and use of resources, their activities, and how they react to changes, interventions and policies.

**Gender- Based Violence (GBV):** GBV refers to harmful acts directed at an individual based on their gender. It is rooted in gender inequality, the abuse of power and harmful norms. It is a serious violation of human rights and a life threatening and protection issue. This also includes harmful practices occurring between individuals, within families and within the community. These include sexual violence, domestic or intimate partner violence, human trafficking, forced and/or early marriage, and other cultural practices like female genital mutilation and wife inheritance that cause harm to persons especially women because of their sex.

**Sexual Exploitation and Abuse:** Actual or attempted abuse of a position of vulnerability, power, or trust, for sexual purposes, including, but not limited to, profiting monetarily,

socially or politically from the sexual exploitation of another<sup>2</sup>. In the context of FSR project, beneficiaries or members of protected affected communities especially women and children are likely to face this challenge either by consultants and or implementing agencies and therefore the need for a strong code of conduct to govern project staff and staff of implementing agencies.

**Sexual Harassment:** According to the Equal Employment Opportunity Commission, Sexual harassment includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical harassment of a sexual nature in the workplace or learning environment.<sup>3</sup> Sexual harassment most often occurs in an official set up among staff members of an unequal positions and may be perpetuated in forms and manifestation including following:

- Intimidation by withholding of certain facilities and or even demotion of a staff.
- Threats and acts of physical and sexual violence.
- Bullying, physical and verbal abuse from work colleagues, or superiors.
- Sexual harassment and unwanted sexual advances.
- Abuse and harassment around pregnancy.

SH differs from SEA in that it occurs between personnel/staff working on the project, and not between staff and project beneficiaries or communities. The distinction between SEA and SH is important so that guiding policies and staff training can include specific provisions on the procedures to report SEA and SH. SH can be experienced by both women and men. There are different forms of gender-based violence that occur in the workplace which must be made known to every worker as part of their induction into the project.

**Youths:** The United Nations, for statistical purposes, defines those persons between the ages of 15 and 24 as youth without prejudice to other definitions by Member States."<sup>4</sup> But in the Sierra Leonean Context and this write up considers a youth as someone between

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<sup>3</sup> Equal Employment Opportunity Commission ( accessed 3<sup>rd</sup> March 2023)

<sup>4</sup> Secretary Generals Report to the General Assembly

the ages of 15- 35<sup>5</sup>**Child:** The UN Convention on the Rights of the Child defines a child as a person (boy or girl) under the age of 18 years.

**Child Labour:** According to the ILO, Child Labour refers to work that deprives children (any person under 18 years) of their childhood, their potential and their dignity, and that is harmful to their physical and/or mental development.

**People with Disability:** Disability is the experience of any condition that makes it more difficult for a person to do certain activities or have equitable access within a given society. Disabilities may be cognitive, developmental, intellectual, mental, physical, sensory, or a combination of multiple factors<sup>6</sup>.

#### **4.0 LEGAL, POLICY AND INSTITUTIONAL FRAMEWORK**

This Gender-Based Violence, Sexual Harassment, Sexual Exploitation and Abuse Action Plan is prepared in line with the appropriate national laws and policies of Sierra Leone. As well, the Action Plan is in tune with relevant the World Bank Environmental and Social Standards (ESSs), specifically ESS1, ESS2, ESS4 and ESS10 and the GBV/SEA/SH Good Practice Notes in IPF involving Major Civil Works Project. The Plan also conforms with international relevant conventions. The relevant policies, laws, strategies, conventions, and technical guidance (categorised into national and international) that have informed the formulation of this Action Plan are described as below:

##### **The National Youth Policy (NYP) of 2003**

The Sierra Leone National Youth Policy (NYP) formulated in 2003 seeks to create a level playing field for youths to actualize their fullest potentials, be competitive nationally and globally, and to contribute as good, responsible citizens to the development of the country. It aims to catalyze widespread action on youth development across five priority areas including education; employment and entrepreneurship; youth leadership and development; health, fitness, and sports; and social justice.

The NYP defines Youth as any Sierra Leonean (female and male) within the 15-35 age bracket, and prescribes the mainstreaming of youth concerns, activities and contributions as critical inputs in the development process of Sierra Leone. The policy also provides guidelines as to the responsibilities of adults, the state and the private sector to the youth on one hand, and the responsibilities of youth to society on the other hand. For effective

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<sup>5</sup> Government of Sierra Leone

<sup>6</sup> <https://en.wikipedia.org/wiki/Disability> date accessed 3rd March 2023

implementation, the policy endorses strengthened collaboration between Youth Organisations, Youth Support Agencies, NGO's, and all line Ministries that are concerned with youth related activities.

National laws and Strategies - Detailed in Table 1 below.

**Table 1:Related National Laws and Strategies**

#	Relevant Laws and Strategies	Purpose
1.	<b>Constitution of Sierra Leone:</b>	The Sierra Leone Constitution (1991) Section 15 of the Constitution guarantees fundamental Human Rights of the individual irrespective of sex. In the area of protection from violence, Section 15(a) of the Constitution provides for the right to life, liberty, and security of person, while Section 20 stipulates that no person shall be subject to any form of torture or punishment or other inhuman or degrading treatment. These constitutional provisions constitute the basis for government to formulate and implement appropriate policies, acts and strategies/programs that especially protect and promote the rights of women, children and disabled; safeguard them against violence and abuse; and promote their socio-economic development.
2.	<b>Gender Equality and Women's Empowerment (GEWE) Act enacted in 2022</b>	Under this Act, GEWE act aims at mainstreaming gender into all development and political processes in Sierra Leone to promote the livelihoods and social protection for women, men, boys and girls for sustainable peace and economic growth. The act emphasizes on ensuring equal opportunities for all sexes to attain senior positions in the workplace, and equal access to productive resources and capacity building training opportunities.
3.	<b>Sexual Offences Act of 2012</b>	Delineates actions that constitute sexual offences, including rape, indecent assault, sexual harassment, incest, indecent exposure, prostitution and child pornography – most of which are considered in the Action Plan.
4.	<b>Persons with Disability Act of 2011</b>	Defines and categorises persons with disability, prohibits discrimination against persons with disability, and provides for equalization of opportunities for persons with disability.
5.	<b>Registration of customary Marriage and Divorce Act, 2009 (Act 05)</b>	Provides for the registration of customary marriages and divorces and for other related matters. Protects girls from forced marriage and makes provision for 18 years as the minimum age for customary marriages, and requires the consent of both parties.
6.	<b>The Child Right Act of 2007</b>	It identifies the Rights of Children as well as their responsibilities, protecting children from being dehumanized and violated. The Act consolidates the age of a child, defines the age limit, looks at issues of early marriage and child neglect among others.
7.	<b>The Anti Human Trafficking Act of 2007</b>	The Act criminalizes the use of human transaction for their individual gainful use when moved from one place to another, without the consent of the person being used. In most cases people are being taken for prostitution; labor, under the guise of helping the development of the individual when their intention is clearly to make money. The most vulnerable groups that suffered from this are women and children. In Sierra Leone, women are being used for prostitution, while the bulk of children are being taken from the provinces for the sole purpose of using them for petty trading, prostitution amongst others, deceiving the parents and the children that the children are being taken for schooling.

#	Relevant Laws and Strategies	Purpose
8.	<b>Domestic Violence Act enacted in 2007.</b>	It defines, criminalizes and prescribes penalties for actions that constitute domestic violence in domestic relationship i.e., between couples and partners, parents and children and other family members. It seeks to address the high incidence of domestic violence in Sierra Leone which sometimes results in death.
9.	<b>Devolution of Estate Act of 2007</b>	An Act to provide for surviving spouses, children, parents, relatives, and other dependents of testate and intestate persons and to provide for other related matters.
10.	<b>National Strategy for Response to Sexual and Gender based Violence (2021-2023)</b>	The strategy demands the adoption of a transformative approach-including through attitudinal change - to accelerate implementation of existing plans and strategies and broaden the reach of protective services so that women and girls are better able to access support and care.

## World Bank Group Gender Policy

The WBG's work on gender is an ambitious and shared commitment across the institution. In 2022, the Bank launched the year-long Accelerate Equality initiative, which explores the progress made and lessons learned over the last 10 years in closing gender gaps and promoting girls' and women's empowerment.

This initiative drives for transformative change in the future and provides an opportunity to showcase successes, learn, and develop ideas and further momentum for the future of gender equality and women's leadership, while taking stock of remaining challenges and strengthening partnerships towards equality.

Noticeable successes recognized by of the initiative across the world are decreased maternal mortality rate by about 10 percent, increased girls' enrollment in secondary school by about 5 percent and relatively increase in the number of women representatives in national parliaments.

Gaps identified in the context of the Initiative, which are also pertinent in Sierra Leone are low female labor force participation, restrictions in women's economic rights especially related to access to productive resources, persistence of significant gender wage gaps disadvantaging women and young girls, absence or inadequate protection for women and young girls, widespread violence and other forms of abuse against women and girls, persistence of gender-unequal social norms that assign bulk of childcare and household chores to women and girls across countries; and early child marriages. These gaps invariably impede women and girls' access to quality healthcare, education, jobs,



and civic participation. They also critically render women and young girls socially and economically vulnerable.

Suggested mechanism towards transformative change toward gender equality involves a collaborative effort for increased investments to:

- Protect and invest in girls', women, and people of all gender identities to enable them to achieve their full potential,
- Reform laws and policies to shift social and gender norms and vary power relations between men and women.
- Build human capital and more inclusive and equitable societies.
- Ensure that all people have access to quality education, health services, and safety nets to make people and societies more resilient to shocks caused by health emergencies, climate change, or economic crises.
- Place more attention on the needs of women and girls' and other gender groups facing multiple forms of disadvantage, including poverty, migrant status, ethnicity, race, disability, and location.
- Promote women's leadership and empowerment, alongside girls' education, family planning, reproductive and sexual health and reduced child marriage.

The FSRP 2 GBV/SEA/SH Action plan was formulated with lessons from the above gaps and remedial mechanisms to inform the development of activities related to institutional collaboration, capacity development, empowerment of women, young girls and persons with disability; accessibility to productive resources, information and support services; stakeholders' consultations; and participation in decision making processes.

### **ILO Convection on Harassment (ILO C190).**

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

## **Convention on the Elimination of All forms of Discrimination Against Women (CEDAW) of 1988**

CEDAW is an international legal instrument that requires countries to eliminate discrimination against women and girls in all areas and promotes women's and girl's equal rights, social justice, decent work and bridging of gender gaps.

### **Beijing Platform for Action**

An action for advancing Women's rights and gender equality world-wide. It is a visionary agenda for the promotion of rights and empowerment of women and young girls in a manner that such women and young girls can effectively participate in decision making, leadership positions, governance systems of their respective countries/societies.

### **Relevant World Bank Environmental and Social Standards (ESS)**

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

#### **ESS1: Assessment and Management of Environmental and Social Risks and Impacts.**

These standards place the responsibility of ameliorating the environmental and social impacts of a Bank-financed project on the borrower. Specifically, the objectives are to:

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

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

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

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

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

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

**ESS 5: Land Acquisition, Land Use Restrictions, and Involuntary Resettlement.**

ESS5 recognizes.

- i. that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons. Project-related land acquisition<sup>1</sup> or restrictions on land use
- ii. may cause physical displacement (relocation, loss of residential land or loss of shelter), economic displacement (loss of land, assets or access to assets, leading to loss of income sources or other means of livelihood), or both. This could be more devastating for women headed households.

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

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

### **Technical Guidance Documents**

The formulation of the Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) Action Plan was also greatly informed by the following documents:

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

**World Bank Good Practice Note: Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing Major Civil Works.** This Good Practice Note (GPN) serves as a tool/guide for Borrowers to identify GBV, Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) related risks that can emerge in Bank Investment Project Financing (IPF) with major civil works contracts and develop best practices to prevent, minimise and/or mitigate such risks. The GPN is developed based on World Bank experience and good international industry practices, including those of other development partners. The focus is on Sexual Exploitation and Abuse (SEA)-exploitation of a vulnerable position, differential power, or trust for sexual favours and actual or threatened sexual intrusion. Workplace Sexual Harassment (SH) in the form of unwelcome sexual advances, request for sexual favours and sexual physical contact, which are the forms of GBV most likely to occur or be aggravated by IPF. The document proposes feasible evidence-based approaches that emphasize prevention, risk

minimization and management, especially risks that harm girls, women and Persons with Disabilities. It also prioritises the importance of building on national, district and community levels' knowledge through stakeholder engagement and continuous monitoring and learning. This document is included in the references.

**Grievance Mechanisms for Sexual Exploitation and Abuse and Sexual Harassment in the World Bank-financed Projects. Interim Technical Note:** The World Bank is committed to preventing and appropriately responding to incidences of SEA/SH and other forms of GBV in the projects it supports. Managing such allegations requires a different approach and methodology that that of those types of concerns raised through the project led GRM due to the sensitive nature of the GBV/SEA/SH, the potential risks to survivors around stigma, rejection, compromises, or harm some of which can even be life threatening thus the reluctance for many survivors to come up. The Technical Note focuses on GM for SEA/SH which are crucial building blocks for the prevention and response strategies of Borrowers. This note provides World Bank task teams with information about SEA/SH GMs so they can effectively advise Borrowers in setting up or adapting GM to cater for the safe and ethical uptake of SEA/SH allegations in line with the ESMP.

## 5.0 ANTICIPATED GBV/SEA/SH RISKS

Considering the high gender risk level of the project, community members especially women and children within beneficiary communities are highly at risk of GBV/SEA/SH including rape, assault, abuse and defilement which could be perpetrated by Project Staff, District Council personnel who will be associated with the project, Contractors, Contractors' Supervisors/sub-project managers, Contractor's Suppliers, Community Facilitators, Service Providers including local aggregators, members of community level implementation structures, Volunteers and Suppliers. Besides these, the risks of backlash in forms of violence and sexual harassment against women who participate in the project including in entering male dominated markets and occupations are foreseen. The following, (not exhaustive) are some anticipated GBV/SEA/SH risks associated with implementation of the project interventions.

1. Project, MDAs and District Councils Staff involved in selecting vulnerable beneficiaries (especially young ladies) may demand sexual favours in return for selection of especially women and young ladies as beneficiaries of the project.

2. Project Beneficiaries (especially women and girls) in the beneficiary communities can be victims of SEA-/SH such as rape, sexual assaults, defilement caused by Project, devolved MDA and the beneficiary District Councils Staff; Project Contractors and or Contractors' Supervisors; Community Facilitators, Members of the community level implementation structures, Service Providers; Aggregators, Trainers and Suppliers during project delivery activities. Community members can be victims of GBV which can not be necessarily project related.
3. Vulnerable persons including persons with disabilities, girls marginalized individuals and women can be targets of sexual exploitation or abuse in the process of accessing benefits (targeting or recruitment) under the project.
4. Project, MDA, District Council Staff, Contractors and or their Supervisors, Community Facilitators, Service Providers, Trainers, Mentors/Coaches,Volunteers and Suppliers, trainers may discriminate against women and persons with disabilities in the inclusion for and participation, recruitment, task assignment, training, decision making (selection, targeting or decision making) in the project implementation processes.
5. Project Staff and other Actors at all levels (national, regional, district and community) may abuse other staff, functionaries, or members of project beneficiary communities physically and/or verbally. They may as well be victims of abuse and other forms of SEA/SH themselves.
6. Project, MDAs, beneficiary District Councils' Staff, Project Contractors' Supervisors and other Staff, other Clients and their assigns, Community Facilitators, Members of the community level implementation structures, Service Providers' Staff, and Suppliers may discriminate amongst each other based on the level of authority or may be victims of SEA/SH and physical or verbal abuse arising from their interactions along the project delivery chain.

Specific factors that may underpin the anticipated GBV/SEA/ SH risks elaborated above are listed in Table 2 below: Most of the risk factors listed cut across the various components of the FSRP 2.

**Table 2: GBV/SEA/SH Risks Related Factors**

#	GBV/SEA/SH Related Risk Factors
1	Massive influx of transient male and female workers into local communities with poor housing, infrastructure and other social amenities for the increased population.
2	Influx of young male from adjoining communities in the district for social cohesion events
3	Considerations will also be made for sex disaggregation of the responsibilities to be assigned each worker at the project site
4	Social cohesion events such as football matches, entertainments, festivals
5	Women and young girls hawking around project work sites and periodic markets in beneficiary communities.
6	Selection, targeting and enrolment activities of unskilled Labor beneficiaries
7	Selection of beneficiaries for Local Economic Development Programs
8	Gender Discrimination in accessing economic/livelihood promotion services
10	Considerations in assigning roles and remunerations
11	Recruitment of Community Facilitators/Volunteers/Change Champions
12	Enrolment and training of enumerators
13	Selection of participants for training and capacity building activities.
14	Protective clothing and accessories for health and safety
15	Poorly designed or maintained physical spaces on project sites and in workers' accommodation. (e.g., poor lightening in and around construction sites and access routes.)
16	Unavailability of support services at project sites (i.e., caregivers and shed for children)
17	Determination of conditions of service (remuneration, workload, time schedules etc) for employees.
18	Recruitment of child laborers
19	Categorization of skills development or capacity building programs based on gender and social status
20	Change in economic status of women with consequent shift in household roles and power relations.

## 6.0 THE GBV/SEA/SH FRAMEWORK FOR PREVENTION AND RESPONSE

The WB SEA/SH Good Practice Notes in IPF involving Major Civil Works will guide the Project in ensuring that it implements the requirement to effectively address GBV/SEA/SH risks to the Project. Consistent with the project's level of risk, which has been assessed as substantial for SEA/SH, the project will develop a prevention, mitigation and response action plan that includes an accountability framework. The action plan, which will be implemented by the GBV Specialist, will include the development of a code of conduct including prohibited behaviors and sanctions in case of violation which shall be signed by all categories of workers; the operationalization of an GBV/SEA/SH sensitive GRM; the training of workers on the code of conduct, the

GRM, SEA/SH; the sensitization of local communities; periodic consultations of women and girls in accessible and safe places; mapping of GBV/SEA/SH service providers; and signing of referral protocol.

### **6.1 Guiding Principles**

The following guiding principles will be adhered to under the auspices of the GBV/SEA/SH Action Plan implementation during project interventions across the Project Components and project implementation communities and beneficiaries:

- i. All persons contracted to work under the FSRP 2 will be treated with respect regardless of their race, colour, ethnicity, religion, political affiliation, disability, birth or other status.
- ii. Gender-based violence, including sexual exploitation and abuse and sexual harassment (GBV/SEA/SH) undermine the mental and physical well-being of persons, and that everyone, including children, have the right to live free from GBV/SEA/SH.
- iii. All forms of GBV/SEA/SH are unacceptable, irrespective of where they occur – in offices, at the work/sites, work/site surroundings, or at worker’s camps.
- iv. The safety and security of survivors of GBV/SEA/SH is of the utmost priority, and must at all times be safeguarded.
- v. Perpetrators will be held accountable for their actions, as GBV/SEA/SH constitute acts of serious misconduct and are therefore grounds for disciplinary measures, penalties and/or termination of employment and service contract.
- vi. Sexual activity with children under eighteen (18), including online harassment, is prohibited. Mistaken belief regarding the age of a child and consent from the child is not a defense in its perpetration.
- vii. The use of inappropriate language or behavior towards women, children and men that may be deemed as harassing, humiliating/demeaning, abusive, sexually provocative or culturally inappropriate is frowned upon and will not go unsanctioned.
- viii. Exchange of money, material products, sex and sexual favours as a basis for provision or denial of employment, contracts and other benefits under the Project is a grievous GBV/SEA/SH breaches and will attract necessary punitive measures.
- ix. Sexual interactions between Project Contractors’ employees or workers at any level and members of the communities surrounding the Project sites that are not consensual among all parties involved in the sexual act are strongly abhorred and discouraged.



- x. The provision of avenues and mechanisms for reporting allegations of GBV/SEA/SH as well as the necessary protection for persons who make allegations of, or report cases of GBV/SEA/SH against retribution, intimidation, retaliation and victimisation is mandatory under the Project. The provision of these avenues and mechanisms will be incumbent on the PIU as well as service providers at all levels.
- xi. Management personnel as well as all stakeholders of the Project have a responsibility to support and maintain an environment that is devoid of the manifestation of GBV/SEA/SH.
- xii. Whistle blowers on GBV/SEA/SH will given the utmost protection, as is necessary.
- xiii. Investigation and referral of complaints of GBV/SEA/SH will be done in a manner that give utmost protection and confidentiality of the both the victim nd the perpetrator including upholding their right to dignity.

## **6.2 The Prevention and Response Implementation Arrangement**

The Implementation Framework details personnel at different implementation levels to work on GBV/SEA/SH mitigation, prevention, and response measures, applying skills received from trainings and complying with developed code of conduct and other protocols. In this framework, the project’s GBV Specialist receives allegations through the general GRM and or designated GBV/SEA/SH uptake channels and forwards the allegations to a dedicated entity to be recruited for appropriate action as well as to the project GBV/SEA/SH Committee to be anchored at the project Safeguards Unit for determination of their linkage with the project. Aside from the FSRP 2 personnel, the role of other stakeholders is crucial. GBV Focal Persons at the District and community levels are critical in following up on the resolution of GBV/SEA/SH cases. All the other personnel assigned relevant tasks will undertake sensitization, community engagement and training activities. Table 3 below describes roles and responsibilities of assigned personnel and stakeholders.

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

**Table 3: Roles and Responsibilities of Stakeholders**

Structure	Designated Staff	Roles and Responsibilities
Project Management Unit	GBV Specialist (GM Operator)	<ul style="list-style-type: none"> <li>• Oversee the overall implementation of preventive, mitigative and response measures to reduce GBV/SEA/SH risks on the Project.</li> <li>• Operationalize GRM sensitive to GBV/SEA/SH complaints.</li> <li>• Liaise with Contractors/Employers, Consultants, Suppliers , MDAs and service providers for updates on the resolution of cases and report to the Project and the World Bank.</li> <li>• Oversee training of FSRP2 staff, service providers and other stakeholders on , GBV/SEA/SH using training modules based on the WB Good Practice Notes.</li> <li>• Ensure effective monitoring, evaluation, reviews and reporting.</li> <li>• Coordinate GBV/SEA/SH service providers mapping and participate in discussions related to referral protocols.</li> <li>• Prepare a code of conduct with prohibited behaviors and sanctions and coordinate its compliance by project stakeholders.</li> <li>• Follow up on GBV/SEA/SH cases with service providers and at community level</li> <li>• Facilitate women and girls separate periodic consultations.</li> <li>• Ensure timely releases of funds for the implementation of GBV/SEA/SH activities</li> </ul>
GBV/SEA/SH Committee	Secretary to the Committee	<ul style="list-style-type: none"> <li>• Receive allegations and determine their likely linkage with the project.</li> <li>• Support GBV/SEA/SH sensitisation, education and training programmes</li> <li>• Support the oversight, monitoring and evaluation of the implementation of the GBV/SEA/SH action plan</li> </ul>
World Bank and other DP funded Agricultural Projects	Social Development/Safeguards/GBV Focal Persons	<ul style="list-style-type: none"> <li>• Collaborate and develop synergy and share best practices with FSRP 2 on GBV/SEA/SH issues</li> <li>• Social Safeguards Unit of the WB provides guidelines and monitors interventions to address GBV/SEA/SH issues under the FSRP 2</li> </ul>

Structure	Designated Staff	Roles and Responsibilities
District and Community GBV/SEA/SH Committees	Focal Persons (GM Operators)	<ul style="list-style-type: none"> <li>• Support sensitisation, education and communication and mitigation measures.</li> <li>• Receive and refer allegations to dedicated entity for action as may be requested by survivors.</li> <li>• Support training activities</li> <li>• Be part of investigation team in case of GBV/SEA/SH to determine if the perpetrator is related to the project and propose sanctions according to the Code of conduct.</li> </ul>
Relevant MDAs	GBV/SEA/SH Focal Persons	<ul style="list-style-type: none"> <li>• Support prevention, mitigation and M&amp;E measures.</li> <li>• Receive and refer cases to dedicated entity or project GM channels for redress</li> </ul>
Dedicated Entity	GBV/SEAS/SH Focal Person	<ul style="list-style-type: none"> <li>• Support mitigation and redress measures -sensitisation, education and communication.</li> <li>• Develop grievance mechanism for GBV/SEA/SH allegations including specific survivor-centered protocols for receiving, recording and addressing GBV/SEA/SH allegations;</li> <li>• Update GBV/SEA/SH Service providers' map</li> <li>• Provide appropriate redress/support/care services to survivors.</li> <li>• Refer/link survivors to other complementary GBV/SEA/SH service providers (when necessary) for support and report/redress;</li> <li>• Maintain confidentiality, safety and security of survivors in accordance with best practice and ensuring survivor-centeredness.</li> <li>• Co-operate with the GBV/SEA/SH Committee of the FSRP Project when they follow-up to know the status of the case.</li> <li>• Provide information on its activities including on when a case has been resolved to the PIU/GM Operator so that it is recorded and closed in the project GBV/SEA/SH case management system.</li> <li>• Establish their own case management support system for processing GBV/SEA/SH cases</li> </ul>
Complementary GBV/SEA/SH	GBV/SEA/Focal Persons	<ul style="list-style-type: none"> <li>• Support mitigation and redress measures -sensitisation, education and communication when requested to do so by the GBV/SEA/SH Committee or the dedicated entity.</li> </ul>

Structure	Designated Staff	Roles and Responsibilities
Service Providers (to whom the dedicated entity may refer survivors to when the support required by the survivor is not within the competency of the dedicated entity)		<ul style="list-style-type: none"> <li>• Provide appropriate redress/support/care services to survivors referred by the dedicated entity.</li> <li>• Maintain confidentiality, safety and security of referred survivors in accordance with best practice and ensuring survivor-centeredness.</li> <li>• Co-operate with the GBV/SEA/SH Committee of the FSRP Project when they are on monitoring missions.</li> <li>• Provide information on their activities including on when a case has been resolved to the dedicated entity so it can be recorded, closed and reported to the PIU/GM Operator</li> <li>• Establish their own case management support system for processing GBV/SEA/SH cases</li> </ul>
District Councils	GBV Desk Officers who have been posted to the District by the Ministry of Gender	<ul style="list-style-type: none"> <li>• Support the implementation of the GBV/SEA/SH mitigation measures such as sensitisation, stakeholder engagements, advocacy, etc.</li> <li>• Receive GBV/SEA/SH cases and report same to the GRM Committee for referrals and resolution.</li> <li>• Facilitate training of FSRP service providers and other stakeholders on GBV/SEA/SH.</li> </ul>
Contractors, Suppliers, Consultants	GBV/ SEA/SH Focal Persons of the Contractor/Supplier/Consultant	<ul style="list-style-type: none"> <li>• Support sensitization, education and communication outreaches.</li> <li>• Ensures implementation of on-site GBV/ SEA/SH policies and code of conduct.</li> <li>• Facilitate the receipt and referral of cases.</li> <li>• Implement sanctions/disciplinary actions against defaulting employees (GBV/SEA/SH perpetrators).</li> </ul>
Communities	Community Facilitators	<ul style="list-style-type: none"> <li>• Support sensitization, education, and communication outreaches.</li> <li>• Receive GBV/SEA/SH cases from the communities and report same to the designated entry points for resolution.</li> </ul>
	Community Members / Beneficiaries	<ul style="list-style-type: none"> <li>• Report Cases to the Various Channels including those established by dedicated entity for redress/support</li> </ul>

Structure	Designated Staff	Roles and Responsibilities
		<ul style="list-style-type: none"> <li>• Spread information on GBV/SEA/SH services and benefits at the community and household levels.</li> </ul>
	Traditional, Religious and Opinion Leaders	<ul style="list-style-type: none"> <li>• Support the sensitization, education, and communication processes.</li> <li>• Mobilise community members for related events.</li> <li>• Facilitate case referral using established project GRM, dedicated entity and other channels for redress processes.</li> </ul>

### 6.3 Development and Application of Code of Conduct (CoC)

A CoC is a policy that an organization develops to guide its employees and third parties on the organizations' principles, moral and ethical expectations, and values. CoC refers to a guide to ethical conduct for all contractors, subcontractors, consultants, employees, workers, and anyone acting on behalf of the FSRP2 in implementing project's, activities and assigned tasks. Within the Project, three (3) CoCs will be put in place namely, General CoC, Contractors/Suppliers/Consultants CoC and Individual CoC.

In the project delivery process, it will be mandatory for all staff, contractors, suppliers, consultants and all entities engaged to sign a Code of Conduct (CoC) that specifies appropriate behavioral conduct, responsibility and penalties for non-compliance with GBV/SEA/SH prohibitions, among other social misconducts. Where appropriate, especially for non-lettered workers, the Code of Conduct (CoC) will be translated into local languages and explained to them before they sign CoC which are the actual contracts/legally binding documents for the delivery of prescribed works, goods and services. Communities will also be informed of the CoC provisions during sensitization, education, and communication outreaches.

The under-listed will essentially form the central elements of CoCs and will variously apply (with sanctions for breaches) to Project Staff, Contractors/Suppliers/Consultants, Service providers and individuals:

1. Sexual Abuse
2. Sexual harassment
3. Sexual Exploitation
4. Use of illegal substances
5. Protection against child labour

6. Gifts and benefits
7. Non-discrimination
8. Stakeholders buy-in and participation.
9. Sanitation requirements
10. Use of Inappropriate language or behavior
11. A reporting system for GBV/SEA/SH cases must be developed.
12. Treatment of Women, children and men with respect and dignity
13. Application of sanctions for breaches as described in Section 6.4 below.

#### **6.4 Sanctions for Breaches**

Reported breaches of CoCs as well as other GBV/SEA/SH offences under the project shall attract punitive measures proportionate to the severity of the breach or offence and may include such measures in descending order of severity as report to the police or judicial authorities if the breach is against a minor; report to the police or other legal authorities with the consent of the survivor; termination of employment of service contract; suspension for specified period; formal (written) warning; and informal warning.

#### **6.5 The Project Grievance Redress Mechanism (GRM)**

The Project has developed a Grievance Redress Mechanism that manages complaints and feedback from all stakeholders involved in the project. The Project GRM aims to provide an effective platform to rapidly address grievances, complaints, concerns of stakeholders and provide effective necessary feedback mechanism for the purpose of enhancing project implementation and delivery of intended results to target groups and beneficiaries. Effective implementation or roll out of the GRM across the project area entails creating wide awareness and visibility on the system/mechanism; establishment of institutional structures assigned with roles and responsibilities for a spectrum of actions; building operational capacity of functionaries and stakeholders; taking steps to effectively and efficiently address and resolve the incidence of complaints and grievances when they arise; and effective application of the GR procedure of receiving, assessing, resolving, monitoring and reporting on received/expressed complaints and grievances.

The GRM also creates the enabling environment for filing, addressing, monitoring and reporting on complaints/grievances including on GBV/SEA/SH in a fair, transparent and timely manner, and without retribution against complainants.

### 6.5.1 Complaints/Grievance Redress Structures with and Roles and Responsibilities

To ensure the accessibility and functionality of the GM system, three-tier complaints/grievance redress structures/committees are established with designated roles and responsibilities. This is because the project activities manifest at the three levels and complaints/grievances are bound to emanate and filter through these tiers/levels for resolution. **Table 4** provides the principal roles and responsibilities of the various Committees. The GR Committees at the three tiers are described as follows:

#### **Tier 1: Sub-Project/Community Level Grievance Committee:**

The committee will be formed at the community level where there is actual manifestation of project activity(ies). This seven-member committee will be led by the sub-project manager/supervisor and responsible for receiving, registering, acknowledging, and forwarding complaints to service providers. Other members of this Committee will include the Chief or his representative, the Mammy Queen or her representative, the youth leader, CBO representative, a representative of persons living with disability (PWD), a representative of the Police where there is a police station/post), the Councilor if he/she is resident in the community or the head of the community development committee (CDC). Already, at the community level, there is some traditional grievance redress mechanism built around traditional leaders which will be leveraged in constituting the Project GRM Committee for effective redress of project related grievances. Again, at the community level, most of the proposed personnel for the committee are available. In communities where some of the proposed membership may not be present, the GRM Team will appoint other capable community members to serve on the committee.

#### **Tier 2: District level Grievance Committee:**

The 8-member committee will be led by the District Agriculture Officer as Focal person, with the Chief Administrator, District Environmental and Social Protection Officer, Gender Desk Officer, District Medical Officer, Local Unit Commander, CSO representative, and a representative of the district judicial service office and other service providers as members. The District Focal Person will be responsible for receiving, registering, acknowledging, and forwarding complaints to service providers at the district level. At the district level, because of the decentralization system, some of the proposed GR membership exist as officials of devolved MDAs.

#### **Tier 3: National/PIU level Grievance Committee:**

This 16-member national level committee formed by the Minister of Agriculture and Food Security (MAFS) is headed by the Project Manager with operational/coordinating support provided by the Social Safeguards, Environmental and Gender Specialists who

are also members of the committee. These specialists led by the Social Safeguards Expert will be responsible for the receipt, registration, acknowledgement, and onward transmission of GBV/SEA-SH cases to service providers. For non-GBV/SEA-SH cases, the committee will try to resolve them, but will not restrain a complainant who is not satisfied with a decision to resort to legal means for redress.

Other members will be drawn from a representative each from project Implementing Agencies (IAs) nominated as GRM Focal persons at the MDA agency level. The IAs include Ministries of Water Resources, Finance, Gender, Lands and Country Planning, Basic and Technical Education, Trade and Industry; National Water Resources Management Agency, NaCSA, SLARI, National Federation of Farmers in Sierra Leone, Environment Protection Agency, Sierra Leone Met Agency, Sierra Leone Local Content Agency, Legal Aid Board and Office of National Security and National Disaster Management Authority.

**Table 4: Roles and Responsibilities of GR Committees at the three Tiers**

Level	Structure	Grievance Redress Role/Responsibility
Tier 1	Community/Sub-Project Committee	<ul style="list-style-type: none"> <li>• Support sensitization, information, education, and communication programmers to promote the GRM at the local level.</li> <li>• Receive, investigate, resolve, and report on complaints/grievances that may be received by community/sub-project level complainants.</li> <li>• Refer grievances especially related to contract breaches, corruption, and fraud to PIU to be dealt with according to the World Bank procurement processes.</li> <li>• Receive and refer GBV/SEA/SH to appropriate service providers for redress;</li> </ul>
Tier 2	District Grievance Redress Committee	<ul style="list-style-type: none"> <li>• Support sensitization, information, education, and communication programs to promote the GRM.</li> <li>• Receive, investigate, and resolve grievances that may be referred to by community/sub-project level Committees or transmitted to it directly from local level complainants.</li> <li>• Refer grievances especially related to GBV/SEA/SH to appropriate service providers, or GBV focal point, or the national level for redress;</li> </ul>
Tier 3	National Committee MAFS/PIU	<ul style="list-style-type: none"> <li>• Institutionalize the GRM within functional structures at the national, district and community/sub-project levels.</li> <li>• Provide operational guidelines to implement the GRM.</li> <li>• Provide required resources (financial, material and human) for implementation of the GRM.</li> <li>• Support the sensitization, information, and education programs to promote the GRM.</li> </ul>



		<ul style="list-style-type: none"> <li>• Maintain updated central database on all grievances and their corresponding outcomes and share same with stakeholders.</li> <li>• Participation in GRM appeals process.</li> <li>• Refer grievances especially related to GBV/SEA/SH to appropriate service providers for redress when the survivor consents.</li> <li>• Monitoring grievance-handling processes by GRM Committees and Service providers.</li> <li>• Preparation and submission of Reports on the operation of the GRM to the World Bank;</li> </ul>
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### 6.5.2 The GR Management Procedures for Non-GBV/SEA/SH Complaints

The FSRP 2 GR System is operationalized through procedures described in the seven steps below: The procedures described in the steps are depicted in Figure 1 which is the grievance redress flow chart of case management for non-GBV/SEA/SH complaints as contained in the Project GRM.

#### **Step 1: Submission, of Complaints/Grievances**

This could be done individually or by a group of people who believe they have been negatively affected by the project's activities. The submission could be through dedicated email, telephone line, project website, letter or verbal (In-person), by post or through any project implementation outlets. A complaint submission form will be provided for filing complaints. Within 5 days

#### **Step 2 - Receive, Register and Acknowledge the Complaints/Grievances**

The GR system registers any grievances that come through verbally, filling up the GM form, by phone, project website or by an email in a grievance registration form or directly onto the digital GR database. An acknowledgement of the complaint(s) is sent to the complainant(s) with the next steps and when to expect feedback using a designed format. Timeframe - 7 days.

#### **Step 3 - Screen, Prioritize and Assign Responsibility**

Complaints /grievances received by the project through Focal Persons at all levels - national, District and Community - will be evaluated, categorized, and lodged in the complaints register as well as a central database according to their type, severity and

complexity. This task will be performed by the respective GR Focal persons at the various levels. Timeframe – Within 14 days.

#### **Step 4 - Investigation, Response Design and Resolution Approach**

Having been assigned a complaint/grievance for redress, the Committee involved will conduct an initial background investigation of the complaint/grievance to determine its validity. If satisfied that there is merit in the complaint/grievance, the responsible GR Committee will propose and detail out the options such as joint meetings with complainants, dialogue, constructive engagements, and mediation for resolving the complaint. The preferred option will then be communicated to the complainant and if agreed upon, used as resolution model for the complaint/grievance. The complainant(s) also has/have the option to suggest an approach of his/her/their convenience in terms of cost, safety and reputation implications, which will be respected and applied. If the complaint/grievance is determined to be of no merit, such a result is promptly communicated to the complainant and recorded. Timeframe – Within 10 days.

#### **Step 5 - Operationalize the Agreed Resolution Approach**

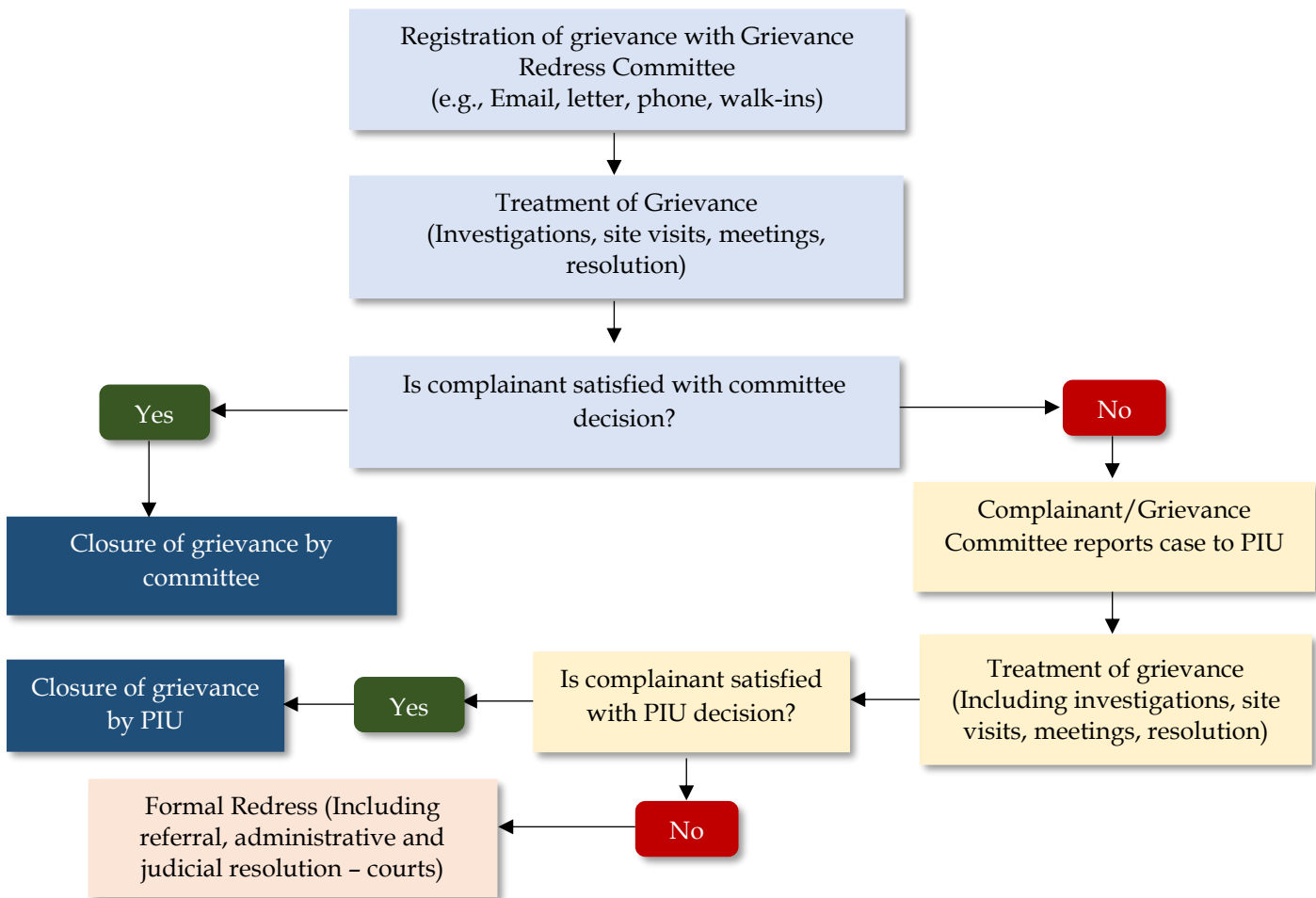
Once an approach is agreed upon, the assigned GR Committee's the Focal Person, will expeditiously undertake the necessary engagements within agreed timeframe until an outcome (satisfactory or unsatisfactory) is arrived at and pronounced to all parties involved as feedback. The resolution engagements will be fair and transparent, affording all parties or their representatives to be heard and emerging issues clarified to them. However, if the engagements fail to yield positive results and the complainant(s) is/are dissatisfied with the way the issue is addressed, he/she/they have the option of appeal. Within 14 days.

#### **Step 6 - Implement, Monitor, and Report on Agreed Resolution Actions**

Upon arrival of an outcome following the operationalization of the chosen resolution approach, the Project Management ensures the steady implementation of actions agreed upon. Focal Persons within the respective GR Committees that dealt with the complaints/grievances will be responsible for tracking /monitoring and reporting on progress and achievements of the specific actions in the grievance resolution outcome. They will also be responsible for documenting and sharing lessons learnt and best practices for future use. Within 1 Month.

**Step 7- Grievance Closure**

A complaint or grievance will be deemed satisfactorily resolved and closed when there is an agreement between the Grievance Redress Committee and the complainant(s) or his/her/their representatives as well as the person(s) or agency(ies) against whom the complaints/grievance/s were brought, that the proposal for redress has been fairly and successfully implemented, the issues addressed and the outcome acceptable by all parties. In this case the complainant(s) will be required to sign a statement confirming that the complaint has been resolved satisfactorily. The Focal Person of the Committee that handled the issues will then record the outcome in the grievance database, provide feedback to all parties involved and report to the project. Within the 1-month timeframe for Step 6 if complaint/grievance is resolved satisfactorily. If legal actions are resorted to, the timeframe will be immediately when the case is adjudicated by the court.



**Figure 1: Complaint/Grievance Redress Flowchart**

### **6.5.3 The GR Management Procedures for GBV/SEA/SH Complaints**

In the context of the FSRP2, grievance management related to GBV/SEA/SH will be outsourced to a dedicated specialized non-governmental service provider in consideration of the substantial project risk level and the complex nature of the project involving many interventions coupled with inadequate capacity of government GBV/SEA/SH service providers. In doing so, Model 3 of the World Bank Interim Technical Notes on Grievance Mechanisms for GBV/SEA/SH will be adapted as a guide. Details of the model are discussed in section 7.0.

## **7.0 GBV/ SEA/SH GRIEVANCE MANAGEMENT UNDER THE FSRP 2**

To effectively manage GBV/SEA/SH allegations the project will adopt Model 3 as of the Interim Technical Notes on SEA/SH Grievance Management. The central thrust of the model is outsourcing the management of all relevant GM tasks to a dedicated non-governmental entity with extensive expertise and capacity to effectively design and manage project related GBV/SEA/SH cases using the steps of the model as described in section 7.1. The principles of confidentiality, anonymity, protection of survivor’s rights, as well as safeguard of survivors from stigmatisation, rejection, and reprisal underpin the operationalisation of the model.

Key institutional arrangements the PIU will make in support to the operationalization of the model include designation of Grievance Operators, establishment of GBV/SEA/SH Committee at the PIU. The GBV Specialist at the PIU will serve as the GM Operator at the national level while the GBV/SEA/SH Focal Persons at district and community levels will be the GM Operators at those tiers.

At the national/PIU level, the project will constitute a GBV/SEA/SH Committee with membership of four officials namely the GBV, Social and Environmental Specialists and a representative of the Ministry of Gender and Children’s Affairs. The Committee to be chaired by the GBV Specialist will be responsible for the verification and investigation of the SEA/SH allegation’s likely link with the project. It will also support the sensitization, information and education programs to promote GBV/SEA/SH mitigation efforts, and provide general oversight and monitoring responsibility in relation to the implementation of the entire project’s GBV/SEA/SH management.

Through competitive procurement process, a dedicated non-governmental entity will be hired by the project to among other tasks, develop grievance mechanism for GBV/SEA/SH allegations including specific survivor-centered protocols for recording

and addressing GBV/SEA/SH allegations; conduct prevention, awareness-raising, and communication activities; provide referral services to link survivors with other related service providers for support and report to the PIU.

The selected dedicated entity will through the GBV Specialist (GM Operator) will provide information on the number of project-related SEA/SH allegations received and/or referred by the grievance mechanism disaggregated by age and sex; the number of open cases and the average time they have remained open; and the number of cases closed and the average time they had remained open. Additionally, for any reporting period, data on the number of survivors who accepted GBV/SEA/SH services for reported incidents and how many did not, will be provided by the dedicated entity.

Other Service providers to whom survivors may be referred to, will in turn provide information on the extent to which support/redress services have been provided to survivors. (A list of some service providers obtained from mapping exercise conducted by the project which can be validated and updated by the selected dedicated entity is provided in Table 5 below). The information provided by such other service providers will reinforce the information contents of the dedicated entity to the PIU through the GBV Specialist.

The GBV Specialist/GM Operator will be in constant communication with the dedicated entity and will in this relationship, manage GBV/SEA/SH issues properly and promptly, monitor and receive information from the dedicated entity, and report to the PIU as well as the World Bank. The information to be reported back to the PIU by the GBV Specialist (GM operator) will include: the nature of the case, whether it is project-related or not, the age and/or sex of the survivor, and if the survivor was referred to services.

## **7.1 Steps in GBV/SEA/SH Grievance Management**

In keeping with the tenets of Model 3 of the Interim Technical Notes on SEA/SH Grievance Management as adopted by the project, as well as drawing lessons from the phases of GBV/SEA/SH Referral Pathway developed by the Government of Sierra Leone (see Figure 2 below), six steps will be followed in addressing reported cases of GBV/SEA/SH as elaborated below:

### **Step 1 - Uptake**

The FSRP2 GBV/SEA/SH grievance management system will receive cases directly from survivors (or complainants, especially if a minor is involved), through the GR Committees, or through any of the multiple channels such as walk-in, a dedicated

hotline, an SMS line, email, a GBV/SEA/SH Service Provider, the PIU, Focal Persons, community facilitators/volunteers/change champions or other state and non-state institutions. These avenues are used as entry points for cases.

A dedicated Entity to be contracted will also develop its own uptake channels that take account of the sensitive nature of GBV/SEA/SH issues as well as the literacy and technological level of the people in the project areas to receive complaints directly from survivors themselves or through their trusted family members or individuals.

In line with the survivor-centered approach, the GM Operator and focal persons from the project's side as well as designated officials of the dedicated entity to whom an allegation is disclosed will provide a safe, caring, and supportive environment to the survivor and maintain confidentiality throughout the steps of providing redress/support to survivors.

### **Step 2 – Sort and Process**

This step will involve designated GM Operators documenting and registering allegations, informing survivors about legal and internal data-sharing obligations and notifying the PIU and the World Bank. In documenting and registering allegations, the GM Operator and Focal Persons in the communities will take note of the nature of the allegations, ascertain whether the perpetrator is related to the project, and record the age, sex, address and family of both the survivor and the perpetrator. Information about whether the survivor was referred to services will also be captured. In dealing with survivors, the contracted GBV Service Provider /Entity will inform the PIU and the survivors of any obligation to report cases to the police. This information will be delivered to the survivor before the disclosure of any information that will lead to mandatory reporting. Information to be shared with the PIU and the World Bank by recipients will be with the consent of the survivors.

### **Step 3 Acknowledge and follow-up.**

Step 3 involves referring survivors to relevant GBV/SEA/SH service providers. Allegations received by project GM Operator or Focal Persons in different communities will be acknowledged and information on services available from various agencies and how to access such services provided to the survivor. Immediately thereafter, the allegation is referred to the dedicated/contracted non-governmental entity for further actions. If received directly by the contracted entity, it will be responsible for addressing the survivor's needs such as health, security, justice, psycho-social and shelter. Where the contracted entity is unable to provide any particular service to the survivor, it will refer

the survivor to other service provider/s who have the capacity to render the required service/s.

In the two referral processes above, tactful information management will be maintained. The survivor's right and consent to control how information about his/her case should be shared with other agencies or individuals as well as any implications of sharing information with other actors will be respected. The survivor's consent as obtained will be documented and signed or thumb-printed by the concerned survivor or his/her trusted representative.

#### **Step 4 - Verify, Investigate and Act**

In this step, four functions will be performed. These include provision of support services to survivors, review of allegations and determination of the likelihood that such allegations are project related; implementation of sanctions for perpetrators in accordance with employment contracts and local labor laws; and resolution and closure of cases.

It will be the responsibility of the contracted entity and other complementary service providers the entity might refer survivors to for complementary services, to provide the needed support to survivors until the survivors are satisfied that the services of the entity and or other service providers are no longer required.

On case-basis, the established GBV/SEA/SH Committee will investigate and determine whether received/referred allegation is project related. If it is ascertained that an allegation is project related, then it is forwarded to the dedicated entity for action. However, if an allegation is determined not to be project related by the GBV Committee, it is referred to community leaders for redress.

At the point where thorough investigations have been carried out and a perpetrator is found to be guilty of an allegation, prescribed sanctions will be applied to him/her depending on the severity of the offence in accordance with the labor laws of Sierra Leone, the employment contracts and the project code of conduct.

The ultimate objective of the GBV/SEA/SH grievance model at this stage is to resolve and close received allegations. There will be two dimensions of resolving and closing SEA/SH cases under the project. 1) the internal project system, in which referred cases to the dedicated GBV/SEA/SH entity or complementary service providers are determined and appropriate actions against perpetrators are taken. 2) the survivor receives needed

support from the GBV/SEA/SH entity and complementary service providers. If the survivor does not wish to submit an official complaint with the employer, the complaint is closed, the resolution and the date it was resolved recorded.

In the event the survivor proceeds with the complaint officially, the case is reviewed by the established GBV/SEA/ SH resolution mechanism, and a course of action is agreed, the perpetrator's employer takes agreed-on disciplinary action against the employee.

Once an action taken according to the established SEA/SH resolution mechanism, and deemed satisfactory by the survivor, the GM Operator is notified by the dedicated entity that the case is closed. The GM Operator in turn, record information about the case and reports to the project and the World Bank.

### **Step 5 - Monitor and Evaluate**

Under this step the GBV/SEA/SH will develop M&E methodology and tools to monitor and track incidence and management of cases and provide quarterly, mid-yearly and annual reports to PIU and the World Bank. The reports will among others, contain information on as the total number of allegations, the number of alleged perpetrators who have a relationship to the project, the type of incident, and the age and sex of survivors. The reports will not contain any information with the potential of being identifying, including names and addresses of survivors, their families, or of alleged perpetrators.

### **Step 6 - Provide Feedback to Survivors**

Timely provision of information to survivors by recipients (GM Operator/GBV Specialist, and Focal Persons from communities and the dedicated entity is crucial in ensuring transparency and accountability in the allegation management process. To this end, through feedback templates survivors will be provided with ongoing updates on especially when the grievance is received; when the case is reported to the PIU if it is project related; when the investigation commences or when a determination is made that there is an insufficient basis to proceed; and when an investigation concludes or when any outcomes are achieved or disciplinary action is taken. When an investigation is concluded, the survivor will be informed first to assess his or her safety before the conclusions of the investigation are communicated to the perpetrator, particularly when sanctions will be taken.





Figure 2: Four Phases of the Referral Pathway

Table 5: List of Some GBV/SEA/SH Service Providers in Sierra Leone

#	Service Providers	Focus Areas of Service Provision
1.	Rainbo Initiative Center	Is a place where people can get help after they have been raped or sexually assaulted in any way. At the Rainbow Centers, they provide free clinical and psychosocial support, medical services, and give medical certificates to victims/survivors of GBV in Sierra Leone.
2.	Ministry of Gender and Children's Affairs	Establishes, coordinates, and monitors the "One Stop Centres (OSCs)" across the country which will support women affected by violence, in private and public spaces, within the family, community and at the workplaces.
3.	Legal Aid	Provides free legal services to poor and vulnerable persons including women, children, persons with disabilities, and survivors of GBV/SEA/SH

#	Service Providers	Focus Areas of Service Provision
4.	Family Support Units of the Sierra Leone Police	<p>The Family Support Units (FSUs) are specialized units attached to police stations across Sierra Leone, with a mandate to investigate all forms of child abuse and violence against children (sexual and physical abuse, exploitation, including commercial exploitation, as well as internal and cross-border trafficking). They also have a mandate to investigate allegations of sexual and domestic violence, as well as commercial and other forms of exploitation against women and vulnerable members of society. Some of the activities that the Family Support Units carry out are as follows:</p> <ul style="list-style-type: none"> <li>- investigation of alleged child sexual violence and abuse cases;</li> <li>- gathering evidence for prosecution of the alleged perpetrator;</li> <li>- referrals for medical assessment and treatment of victims, when the Family Support Unit is the first point of contact and there is no medical report;</li> <li>- giving advice on the process of investigation and prosecution to children/victims and their families/care givers.</li> </ul>
5.	Traditional Authorities	Provide security and sometimes safe homes for the protection of community members including children, women, PWDs, provide counselling and other community services to victims of violence, exploitation and abuse.
6.	Legal System	Ensures that survivors receive justice and perpetrators are brought to justice.
7.	Family Support Unit	Provides advice on the process of investigation and prosecution to children/victims and their families/care givers. The Family Support Units have a partnership with the Ministry of Gender and Children's Affairs in an effort to combat all forms of abuse against children and women.
8.	Save the Children	With the establishment of the six "One Stop" Centers by the Government of Sierra Leone in July 2020, several child protection agencies are supporting these centers so that children who are victims of sexual and gender-based violence are provided a safe space, adequate medical care and legal services to bring cases to court. Save the Children's activities align to this government's policy on protecting children.
9.	World Vision	Provides health and nutrition services, access to education and protection of all children.
10.	Plan International	A development and humanitarian organisation that advances children's rights and equality for girls.
11.	Care International - SL	Ensure the routine inclusion, resourcing, and monitoring of GBV risks mitigation measures across all programming; works with communities to shift patriarchal social norms and address the root causes, exacerbating factors and impacts of GBV/SEA/SH in crisis contexts; creates and manages safe-spaces for women and girls; provides gender and age sensitive sexual and reproductive health in emergency services including where possible, the clinical management of rape, engage men and boys to prevent and address GBV in their communities and inform learning adaptation and scale up. CARE's work also involves advocacy to influence changes in sector-wide humanitarian processes, practices, policies and programming in ways that address GBV/SEA/SH.

#	Service Providers	Focus Areas of Service Provision
12	Defence for Children S/L	Monitors and documents violations of children’s rights and provides legal assistance to child victims of violence and children in conflict with the law, including those who are detained and accused wrongfully.
13.	Don Bosco	Salesians at Don Bosco Fambul runs a Girls Shelter where professional social workers and pastoral workers provide crisis intervention and follow-up care for girls and young women who have been victims of sexual assault.
14.	Aberdeen Women’s Center (AWC)	Is a hospital providing a range of free health services to women, adolescent girls and children of Sierra Leone. Specifically, they focus on fistula, maternal and child health, as well as family planning services. AWC’s mission is “to provide high quality, holistic care and treatment free of charge.”
15.	Commit and Act Foundation	Commit and Act is an organization dedicated to empowering vulnerable populations and they work with local healthcare workers and other professionals to aid survivors and help prevent violence. Through a survivors-centered approach, they treat survivors of <b>domestic and gender-based</b> assault, people struggling with trauma and community members facing mental health difficulties. They do provide a safe, accepting shelters and workshops, while offering space both to heal from pain and to build fulfilling lives and families.

## 7.2 Enabling Actions to Operationalise the GBV/SEA/SH Action Plan

### → Integrating GBV/SEA/SH Contractors’/Suppliers’/Consultants’ Obligations

To prevent, minimize or manage the incidence of GBV/SEA/SH issues, the Project will ensure that Contractors, Suppliers and Consultants engaged for major contracts adopt a GBV/SEA/SH strategy to be furnished by the PIU. Key elements of the strategy are summarized in Table 6

**Table 6: GBV/SEA/SH Prevention and Response Strategy for Contractors, Suppliers and Consultants**

Strategy	Description	Tailored Actions/measures
Screening	Screen the particular activity on contract, supply or consultancy to identify potential GBV/SEA/SH risks	<ul style="list-style-type: none"> <li>• Rate the identified risks and impacts in line with the hierarchy of impacts.</li> <li>• Propose possible mitigation options</li> </ul>
Assess and prepare	Assess sub project context for risks and vulnerabilities for GBV/SEA/SH. Assess and document contractor’s ability to understand and act on gender gaps in the workforce, and put in place staff,	<ul style="list-style-type: none"> <li>• Understand and identify incidents and the prevailing climate for GBV/SEA/SH.</li> <li>• Understand how the contractor’s operations may be impacting GBV/SEA/SH in the host communities.</li> <li>• Attend Pre-tender training organized by the PIU for firms and assist interested firms in assessing and understanding the Labour-intensive models.</li> </ul>

Strategy	Description	Tailored Actions/measures
	structures and plans to address these issues	
Application of mitigation options	Based on the assessment provide mitigation techniques to be applied	<ul style="list-style-type: none"> <li>• Filling capacity gaps through training</li> <li>• Supply of various materials for references</li> </ul>
Address	Take specific practical actions to increase gender diversity, inclusion and equitable opportunities and work distribution	<ul style="list-style-type: none"> <li>• Adopt employee and Code of Conduct for addressing GBV/SEA/SH.</li> <li>• Adhere to contractor level and individual code of conduct to prevent, report and address GBV/SEA/SH.</li> <li>• Train workers on GBV/SEA/SH.</li> <li>• Consult with local communities and project on the project activities, how to report complaints, as well as GBV/SEA/SH support services.</li> </ul>
Supervise, Monitor, evaluate results and sustain	Develop appropriate reporting mechanisms for tracking and addressing GBV/SEA/SH complaints	<ul style="list-style-type: none"> <li>• Implement a tailored GM and GBV/SEA/SH tracking system based on clear indicators.</li> <li>• Co-operate with the Project Team in their monitoring and supervisory role in respect of a case.</li> </ul>

Within the strategy, all Contractors with their sub-contractors, Suppliers and Consultants as appropriate shall:

1. Go through the procurement and bidding processes with the understanding that they must satisfy the requirements of mitigating, preventing and responding to GBV/SEA/SH cases at their firm level;
2. Sign the Code of Conduct prepared by the PIU before the contract documents are completed and signed by the parties;
3. Develop/adopt their CoCs and policies and procedures on GBV/ SEA/SH for their workforce and employees to sign on;
4. Sensitize and train their management and workers on GBV/SEA/SH and compliance with the CoCs and policies;
5. Agree to participate in the grievance mechanism of the FSR Project as entry points for reporting of GBV/ SEA/SH cases;
6. Ensure that cases reported by survivors are brought to the attention of GR Structures to be logged into GBV/SEA/SH GR System;

7. Ensure their readiness to address a case of GBV SEA/SH referred to the firm alongside the SP
8. Have trained and dedicated personnel (internal grievance/resolution mechanism) to address (investigate, mediate, sanction) an employee for GBV/SEA/SH should a case be reported;
9. Co-operate with any GBV Services Provider whom the team has requested to provide support to the survivor during the handling of the matter at the contractor level;
10. Ensure that the engagement and treatment of their workforce according to Sierra Leone's Labour Act and other relevant legislations;
11. Ensure that the protection, safety, security and confidentiality of workers are protected;
12. Desist from employing minors as workforce;
13. Provide protective clothing and ensure timely and regular payment of fair wages/salaries to workers;
14. Provide water, sanitation and hygiene facilities at work sites for women and men;
15. Report to the assigned Safeguards personnel when the case is resolved for onward logging by the Grievance system.

→ **Data Protection and Handling of Confidential Information**

The FSR 2 Project will ensure that data and information on GBV/SEA/SH are safely collected, stored, and analyzed when cases are reported. This will ensure that information on GBV/SEA/SH can be shared in safe and ethical ways with other agencies and Service Providers. To this end, the Project will:

1. Protect the data of all survivors and share only with those who are authorized to obtain such information.
2. Share survivor information only within the context of a referral or case conferencing, and with the informed consent of the survivor. (See Annex 3 and Annex 4).
3. Adopt a protocol with GBV/SEA/SH sensitivity to determine how such data and information are to be stored, shared, and used.

→ **Awareness Raising and Community Stakeholder's Engagements**

The PIU through the GBV/SEA/SH Committee will develop and lead the implementation of awareness creation, sensitization and education strategy on GBV/SEA/SH, targeting key stakeholders as audience. The audience will include all project communities, particularly women, men, girls, youth, children and persons with

disabilities; identified GBV/SEA/SH Service Providers on and off project sites; Project Staff and related MDAs' staff; beneficiary District Councils' officials; CSOs, CBOs, FBOs, NGOs; Traditional, Religious and other Opinion Leaders; and the general public. Key elements of the strategy will include the following:

→ **Design, Development and Dissemination of IE&C Materials**

The GBV/SEA/SH Committee will develop IEC materials such as posters, brochures, stickers, flyers, banners to communicate strategic and contextual messages to the target audiences. The materials in English and local languages will be used as tools during stakeholders' engagements such as community durbars, town hall meetings and mass sensitization and education outreach campaigns in communities. Besides, these materials will be displayed at strategic locations within the communities, at District Councils' premises, community centers and the PIU office premises.

→ **Publication of Available Services in Project Communities**

In collaboration with the prospective dedicated entity, provide available inventory of all GBV/SEA/SH service providers as well as accessible systems of reporting and referral pathways to project communities, all project sites and stakeholders of the GRM.

→ **Social media platform for interaction between Project Staff, Project Contractors' Staff and the Public**

Develop and design GBV/SEA/SH) Prevention and Response of Messages on the various social media platforms to be used by the project e.g., Twitter, Facebook, WhatsApp, SMS, Instagram. The social media platforms will be used solely for sensitization and education and not as uptake channels.

→ **Use of Community FM Radio Dialogues**

The Project will identify strategic communication partners in the community FM stations and community information centers (CICs) for talk shows aimed at disseminating crucial information to the public. It will also use town criers in communities to make announcement where radio FM and community radio stations cannot reach.

→ **Film Shows/Documentaries**

The communication team will leverage on existing or produce short films and documentaries on GBV/SEA/SH and use them as tools for public sensitization through the national and local television outlets with whom partnerships through MOUs will be entered.

→ **Engaging Community GBV/SEA/SH volunteers/Champions/Ambassadors**

Identify and train GBV/SEA/SH volunteers/champions/ambassadors to be actors of change in the communities.

→ **Training and Capacity Building for Project Actors**

Training manuals will be developed by the PIU and used for delivery of training and refresher trainings specified in the GBV/SEA/SH Prevention and Response Action Plan. These trainings will target Project team, implementation partners, Project contractors and Service Providers

The FSRP 2 Project Team especially the GBV, Social and Environmental Specialists, will be trained on handling GBV SEA/SH cases including but not limited to:

- Prevention, Mitigation and Response framework as well as responsibilities and reporting; Confidentiality and survivor-centeredness;
- Gender Analysis using GBV/SEA/SH classification tool;
- Protection of witnesses and whistle-blowers;
- Procedures requirements, including legal requirements;
- Referral processes and the roles of GBV/SEA/SH Service Providers mapped under the FSRP 2;
- Monitoring, reporting data protection and knowledge management system.

→ **Establish Collaboration and Networking with Partners in the GBV/SEA/SH Sector**

The PIU through the GBV/SEA/SH Committee will establish a sustainable network and working relations with other development actors in the GBV/SEA/SH sector to develop synergy, share experiences, lessons learnt and best practices. Collaboration and Networking modalities will include meetings, fora, working sessions joint monitoring and study tours. The actors could be national and international organizations working in Sierra Leone, or in their home countries.

→ **Knowledge Generation, Management and Communication**

As a learning institution, the PIU through the GBV, Social, and Environmental Specialists and in collaboration with other stakeholders will document experience, knowledge and lessons gained from operationalization of the GBV/SEA/SH Action Plan for dissemination among project implementers, partners, and beneficiary communities. The dissemination will enhance regional, national and district level knowledge exchange activities on GBV/ SEA/SH as well as feed into the national policy and regulatory loop.

→ **Monitoring, Evaluation and Reporting**

The PIU will monitor and evaluate the implementation of the GBV/SEA/SH plan within the context of the overall project M&E System. component activity prevention and response systems as an integral to ascertain their effectiveness, efficiency and impact. The Project Social, Environmental and GBV Specialists at the PIU, GBV/SEA/SH Focal Persons at District and Community levels will coordinate and lead the implementation of monthly M&E activities related to this GBV/SEA/SH Action Plan at their respective levels. The Project level joint quarterly monitoring and evaluation missions will be undertaken by the M&E Unit in collaboration with relevant IAs and the Safeguards Team.

Detailed M&E indicators against which results of the project GBV/SEA/SH Prevention and Response system and activities will be measured will be developed and applied at all levels. Regular quarterly supervision and monitoring of progress on GBV/SEA/SH prevention and response activities within the project communities and activity sites will be done. Monitoring activities will focus on areas such as compliance with relevant policies, regulations, principles, code of conduct and activity specifications; gender equality and dissegregation relative to facilities and opportunities; availability, accessibility and utilisation of redress channels; and the effectiveness of the dedicated entity and complementary GBV/SEA/SH service providers and other stakeholders with regard to their roles in the System. Annex 2 is a check list to be used during monitoring rounds. There will also be annual review of the GRM and the GBV/SEA/SH systems to ascertain their effectiveness, and relevant strategies to be pursued for continuous improvement.

## **8.0 THE FSRP GBV/SEA/SH PREVENTION AND RESPONSE ACTION PLAN**

Table 7 below depicts the activities and actions to respond to issues of GBV/SEA/SH as well as responsibility assignment in the implementation of the Action Plan. It also indicates timeframes for delivery of the activities, monitoring time schedules, implementation responsibilities and tentative budgets.



Table 7: GBV/SEA/SH Prevention and Response Action Plan

Project SEA/SH risks	Indicators	Mitigation Measures / Description of activities pertinent to risks	Responsible Party	Timelines				Budget USD
				Q1	Q2	Q3	Q4	
<p>Component 1: Digital Advisory Services for Agriculture and Food Crisis Prevention &amp; Management: This component seeks to take advantage of new information technologies, data sources and service delivery models involving the private sector to provide digital advisory services to address the multi-dimensional nature of Food Security. This component has two subcomponents:</p> <p>Sub-Component 1.1 - Upgrading Food Crisis Prevention &amp; Monitoring Systems (to be implemented at the regional level); and 1.2 - Strengthening Creation and Provision of Digital Advisory Services for Farmers which is to be implemented at the country/national level, through 'e' extension</p>								
Risks of sexual exploitation and abuse related to social transfer activities (e.g., targeting, distribution of services or transfers, supervision of staff, etc.)	# of project-related staff and workers trained and oriented on CoC.	Accountability plan and response, including SEA/SH requirement and expectation are adapted in bid/contract/procurement documents.	GBV Specialist and Rainbo Initiative					200
Risks of sexual harassment due to potential lack of supervision of male and female staff	# of people who signed CoCs  # of SEA/SH complaints received	Ensure the signing and enforcement of code of conduct by project personnel and workers which will include attributes such as prohibited actions or behaviors and applicable sanctions	GBV Specialist and Rainbo Initiative					No Cost
Lack of access by female beneficiaries to the benefits and services of the project (e.g., lack of representativeness and decision-making processes)	# of SEA/SH complaints referred to services  # of project workers and staff who sign CoC	Development and signature of codes of conduct (CoC) for project workers and staff, which include at least: - Specify appropriate roles and responsibilities in CoCs. - Carry out orientations on CoC - Have CoCs signed by all those with a physical presence at the project site. -	GBV Specialist and Rainbo Initiative					No Cost

at the community level, lack of consideration of women's needs in setting up the national system)	# of communities that have access to dissemination materials: CoCs (including visual illustrations) and awareness raising IEC materials	Disseminate CoCs (including visual illustrations) and discuss with employees and surrounding communities.						500
Lack of access to support services for female beneficiaries and also survivors of SEA/SH due to difficult access conditions in humanitarian and/or remote areas where the project will be implemented	% of GBV/SEA/SH complaints that are resolved within the time frame How long it takes to resolve an SEA/SH complain	<ul style="list-style-type: none"> <li>Implementation of the SEA/SH, which includes at least the following: - Specific procedures for dealing with SEA/SH complaints, including delays and possible sanctions</li> </ul>	GBV Specialist and Rainbo Initiative					1000
<b>Sub Total</b>								<b>1700</b>
<b>Component 2: Sustainability and Adaptive Capacity of the Food System's Productive Base. This component aims to enhance the resilience of the food system's productive base in ways that enable small and medium producers (especially women and youth) to sustainably meet their nutritional needs and raise their income levels. It also seeks to consolidate Regional Agriculture Innovation Systems and Strengthen Food Security through ILM.</b>								
Risks of sexual exploitation and abuse related to Supporting community mobilization for ILM	All project personnel and workers sign and adhere to codes of conduct for GBV/SEA/SH.	Ensure the signing and enforcement of code of conduct by project personnel and workers which will include attributes such as prohibited actions or behaviors and applicable sanctions	GBV Specialist					Budgeted for Already

Risks of abuse or violence related to harmful social norms in the contexts of project implementation that limit women's access to financial resources	# of Reporting procedures for GBV/SEA/SH- related complaints, including accessible channels for targeted communities and project personnel	Implementation of the GBV/SEA/SH, which involves the application of the already developed procedures alongside engagement with community leaders.	GBV Specialist and Rainbo Initiative					1,000
	Procedures to report complaints related to SEA/SH, including accessible lanes to targeted communities and project staff - Obligations on the guiding principles for the ethical and confidential handling of such complaints	Effective roll out of the GRM which provides mechanisms for receiving and referring issues related to GBV/SEA/SH to relevant Service providers for redress.	GBV Specialist and Rainbo Initiative					3,000
Risks of sexual harassment due to potential lack of supervision of male and female personnel in the field or even with community people during Land and watershed restoration, Soil fertility management, Crop production, Livestock Production exercises.	# of GBV/SEA/SH cases reported by community members and other stakeholders that are referred to service providers for redress.	Effective roll out of the GRM which provides mechanisms for receiving and referring issues related to GBV/SEA/SH to relevant Service providers for redress.	GBV Specialist and Rainbo Initiative					Budgeted for Already
	Average delay for resolving an SEA/SH-related complaint	Activate and roll out the GBV/SEA/SH GRM tool to handle GBV/SEA/SH complaints ethically and confidentially which will include, at a minimum, the following attributes: anonymity, survivor - centred, and survivor informed consent.	GBV Specialist and Rainbo Initiative					6,000

Risks of discrimination against women and persons with disability in participation, recruitment, tasks and decision making	All communities where the project GRM tool has been successfully rolled out.	Specific procedures to handle SEA/SH-related complaints, including timeline and possible sanctions	GBV Specialist and Rainbo Initiative					Budgeted for Already
Lack of information for female beneficiaries regarding the project and its potential risks due to lack of independent consultations with women in safe and enabling environments	# of Reporting procedures for GBV/SEA/SH- related complaints, including accessible channels for targeted communities and project personnel	Community consultations with women’s groups or female beneficiaries in safe and enabling environments regarding the potential impact of the project and its activities and associated risks, including feedback mechanisms that may be accessible at community level	GBV Specialist and Rainbo Initiative					3,000
Lack of access to support services by female beneficiaries and SEA/SH survivors owing to the low quality and weak geographic coverage of support services and difficulty accessing services in humanitarian response and/or remote areas	% of SEA/SH-related complaints that are resolved within the expected timeframe will be captured	Reporting procedures for SEA/SH-related complaints, including accessible channels for targeted communities and project personnel	GBV Specialist and Rainbo Initiative					Budgeted for Already
	100% of SEA/SH-related complaints that are received through GM or other project feedback mechanism will be captured.	Obligations regarding guiding principles for the ethical and confidentiality, which will include, at a minimum, the following attributes: Specific procedures to handle SEA/SH-related complaints, including timeline and possible sanctions	GBV Specialist and Rainbo Initiative					1,000

where the project will be executed	Number of women consulted	Reporting procedures for SEA/SH-related complaints, including accessible channels for targeted communities and project personnel	GBV Specialist and Rainbo Initiative					2,000
	% of health structures targeted by the project that receive information about SEA/SH prevention and prohibition of such actions	Obligations regarding guiding principles for the ethical and confidential management of SEA/SH complaints management of SEA/SH complaints	GBV Specialist and Rainbo Initiative					3,000
	# of community consultations with women and girls, and in how many project intervention areas	Community consultations with women's and girls' groups or female beneficiaries in safe and enabling environments regarding the potential impact of the project and its activities and associated risks, including feedback mechanisms that may be accessible at community level	GBV Specialist and Rainbo Initiative					3,000
	# of community consultations with boys and men separately and in how many project intervention areas	Community consultations boys and men separately in safe and enabling environments on positive gender norms and to get them as agents of change						Budgeted for Already
	# of participants in these community awareness-raising sessions (disaggregated by sex and age, if possible)	Awareness-raising in targeted communities by the project regarding SEA/SH-related risks and GM or other feedback mechanism to respond to complaints	GBV Specialist and Rainbo Initiative					Budgeted for already

	All health structures targeted by the project that receive information about SEA/SH prevention and prohibition of such actions	Dissemination of information in health structures about SEA/SH prevention, prohibition of such actions in the health sector, and access to reporting and complaint mechanisms	GBV Specialist and Rainbo Initiative					3,000
<b>Sub Total</b>								<b>25,000</b>
<b>Component 3: Market Integration &amp; Trade:</b> <b>Under this component, food trade in West Africa will be expanded to enable an effective distribution of surplus produce to deficit regions and facilitate production and commercialization of agricultural inputs such as agro-chemicals and improved seeds, and technologies within across national borders. This would be achieved through attracting private investment in priority value chains.</b>								
Risks associated with the provision of agro-inputs and services for the production of short duration crops.	100% of project personnel and workers who sign and adhere to codes of conduct for GBV/SEA/SH.	Ensure the signing and enforcement of code of conduct by project personnel and workers which will include attributes such as prohibited actions or behaviors and applicable sanctions	GBV Specialist and Rainbo					No Cost
Lack of information for female beneficiaries regarding the project and its potential risks due to lack of independent consultations with women in safe and enabling environments	100% of GBV/SEA/SH cases reported by community members and other stakeholders that are referred to service providers for redress.	Effective roll out of the GRM which provides mechanisms for receiving and referring issues related to GBV/SEA/SH to relevant Service providers for redress	GBV Specialist and Rainbo					Budgeted for Already
	The project SEA/SH GRM tool is operationalized in all project implementation communities	Activate and roll out the GRM tool to handle GBV/SEA/SH complaints ethically and confidentially, which will include, at a minimum, the following attributes:	GBV Specialist and Rainbo Initiative					5,0000

<p>Lack of access to support services by female beneficiaries and SEA/SH survivors owing to the low quality and weak geographic coverage of support services and difficulty accessing services in humanitarian response and/or remote areas where the project will be executed</p>	<p>Average delay for resolving an SEA/SH-related complaint</p>	<p>Specific procedures to handle SEA/SH-related complaints, including timeline and possible sanctions</p>	<p>GBV Specialist and Rainbo Initiative</p>				<p>Budgeted for Already</p>
<p>Community consultations with women or female only, male only, boys only and girls only groups of beneficiaries in a safe and enabling environment regarding the potential impacts, associated risks and feedback mechanism of the project</p>	<p># of women /men/boys/girls only consulted separately</p>	<p>Separate community consultations with women only groups or female beneficiaries in a safe and enabling environment regarding the potential impacts, associated risks and feedback mechanism of the project</p>	<p>GBV Specialist and Rainbo Initiative</p>				<p>2,000</p>
<p>Community consultations with women or female only, male only, boys only and girls only groups of beneficiaries in a safe and enabling environment regarding the potential impacts, associated risks and feedback mechanism of the project</p>	<p>100% SEA/SH-related complains are received through GM or other project feedback mechanism will be captured</p>	<p>Reporting procedures for SEA/SH-related complaints, including accessible channels for targeted communities and project personnel</p>	<p>GBV Specialist</p>				<p>Budgeted for Already</p>

	100% of survivors report cases receive survivor-centered case management	Obligations regarding guiding principles for the ethical and confidential management of SEA/SH complaints	GBV Specialist					Budgeted for Already
	# of community consultations with women only in all project intervention areas	Community consultations with women's groups or female beneficiaries in safe and enabling environments regarding the potential impact of the project and its activities and associated risks, including feedback mechanisms that may be accessible at community	GBV Specialist and Rainbo Initiative					3,000
Risks associated with movement of women, girls and youths' movement from one community to the other to access marketing facilities	# of project communities reached with targeted GBV/SEA/SH messages	Awareness raising in targeted communities by the project regarding SEA/SH related risks and GM or other feedback mechanisms to respond to complains	GBV Specialist					2,000
	100% of health structures targeted by the project and receive information about SEA/SH prevention and prohibition of such actions	Dissemination of information in health structures about SEA/SH prevention, prohibition of such actions in the health sector, and access to reporting and complaint mechanisms	GBV Specialist and Rainbo Initiative					2,000
	Number of women, girls and youths reached with targeted GBV/SEA/SH risks and mitigation messages	Sensitization and Education of migrant women, girls and youths to marketing centers in project catchment areas	GBV Specialist and Rainbo Initiative					2,000



Risk related to availability of gender sensitive market integration information for project intervention to reduce access to market challenges across gender and youths	Available TOR for hiring a consultant to do gender analysis in market integration and trade	Preparation of TOR for gender analysis in Market integration and Trade	GBV Specialist					No cost
<b>Sub Total</b>								<b>16,000</b>
<b>Component 4: Contingent Emergency Response Component: The component will make resources available to strengthen the response capacity of the Government in emergency situations sparked by natural disasters (pests, droughts and floods, pandemic outbreak, etc.) through a synergy of actions.</b>								
Risks relating to the procurement and distribution of seeds and improved livestock breeds to farmers.	All project personnel and workers sign and adhere to codes of conduct for GBV/SEA/SH.	Ensure the signing and enforcement of code of conduct by project personnel and workers which will include attributes such as prohibited actions or behaviors and applicable sanctions	GBV Specialist					No Cost
Risks related to cash transfer to meet immediate food needs of crisis-affected households.	100% of GBV/SEA/SH cases reported by community members and other stakeholders are referred to service providers for redress.	Effective roll out of the GBV/SEA/SH GRM which provides mechanisms for receiving and referring issues related to GBV/SEA/SH to relevant Service providers for redress.	GBV Specialist and Rainbo Initiative					3,000
Risks related to selection of project beneficiaries and service providers	Average delay for resolving an SEA/SH-related complaint	Activate and roll out the GRM tool to handle GBV/SEA/SH complaints ethically and confidentially, which will include, at a minimum, the following attributes: anonymity, survivor centered and informed consent	GBV Specialist					Budgeted for Already

Risks of discrimination against women and persons with disability in participation, recruitment, tasks, and decision making	All GBV/SEA/SH case management actors adhere to ethical, and survivor centered principles.	Obligations regarding guiding principles for the ethical and confidential management of GBV/SEA/SH complaints	GBV Specialist and Rainbo Initiative					Budgeted for Already
Risk of SEA/SH at workplace among staff, between staff and IAs/ Service providers and between PIU/IAs/ Service providers and beneficiary communities	All project personnel and workers sign and adhere to codes of conduct for GBV/SEA/SH.	Ensure the signing and enforcement of code of conduct by project personnel and workers which will include attributes such as prohibited actions or behaviors and applicable sanctions	GBV Specialist					Budgeted for Already
Risks related to providing cash for work to youth in rural areas to support local food production	# of community members consultations with women held and in all project intervention areas	Community consultations with women's groups or female beneficiaries in safe and enabling environments regarding the potential impact of the project and its activities and associated risks, including feedback mechanisms that may be accessible at community level	GBV Specialist and Rainbo					2,000
Risks associated with the provision of agro-inputs and services to produce short duration crops.	# of personnel/ workers of IAs involved in distribution of agro inputs who signed and adhered to CoC	Enforcing the signing and implementation of code of conduct for project personnel and workers of IPs involved in the distribution of agro inputs.	GBV Specialist and Rainbo Initiative					Already Budgeted for

Risks associated with the school feeding program and the establishment of school gardens	# of personnel/ workers of IAs involved in School feeding program and the establishment of school gardens who signed CoC	Enforcing the signing and implementation of code of conduct for project personnel and workers of IPs involved in the school feeding program and the establishment of school gardens.	GBV Specialist					2,000
Lack of information for female beneficiaries regarding the project and its potential risks due to lack of independent consultations with women in safe and enabling environments	# of female beneficiaries who are reached with information about the GBV/SEA/SH through separate consultations	Awareness-raising in targeted communities by the project regarding SEA/SH-related risks and GM or other feedback mechanism to respond to complaints	GBV Specialist and Rainbo Initiative					Budgeted for already
Lack of access to support services by female beneficiaries and SEA/SH survivors owing to the low quality and weak geographic coverage of support services and difficulty accessing services in humanitarian response and/or remote areas where the project will be executed	# of female beneficiaries and GBV/SEA/SH survivors who have access to humanitarian response owing to low quality and weak geographic coverage	Link female beneficiaries to humanitarian response service providers	GBV Specialist and Rainbo Initiative					1,000

Knowledge Generation, Management and Communication	100% of all projects have stakeholders' knowledge on GBV/SEA/SH increased	Increase the knowledge PIU, IAs, and project Implementation communities on GBV/SEA /SH mitigation, case management and provision of various services for survivors	GBV Specialist and Rainbo Initiative					500
	Variety of communication and IEC communication tools prepared and communicated through flyers, poster, radios etc.	Develop IEC materials for dissemination	GBV Specialist and Rainbo Initiative					1000
<b>Sub Total</b>								<b>9,500</b>
<b>Component 5: this component will finance project management costs of the PIU established within the National Development Partner Project Coordinating Office (NDPPCO). Specific costs are staffing; coordination, monitoring, evaluation and reporting; project technical audits, mid-term and end project evaluation. Other expenditures areas are safeguards, financial, procurement, training and grievance redress mechanism. The component will also support advocacy, knowledge exchange and partnerships for sustainable agriculture and food systems resilience</b>								
Risk of SEA/SH at workplace among staff, between staff and IAs/ Service providers and between PIU/IAs/ Service providers and beneficiary communities	100% of project personnel and workers sign and adhere to codes of conduct for GBV/SEA/SH.	Ensure the signing and enforcement of code of conduct by project personnel and workers which will include attributes such as prohibited actions or behaviors and applicable sanctions	GBV Specialist					No Cost
Lack of information for female beneficiaries regarding the project and its potential risks due to lack of	100% of GBV/SEA/SH cases reported by community members and other stakeholders and are referred to service providers for redress.	Effective roll out of the GRM which provides mechanisms for receiving and referring issues related to GBV/SEA/SH to relevant Service providers for redress.	GBV Specialist and Rainbo Initiative					3,000

independent consultations with women in safe and enabling environments	100% community consultations with women only in all project intervention areas	Community consultations with women's groups or female beneficiaries in safe and enabling environments regarding the potential impact of the project and its activities and associated risks, including feedback mechanisms that may be accessible at community level	GBV Specialist and Rainbo Initiative					Budgeted for Already
	100 % of health structures targeted by the project that receive information about SEA/SH prevention and prohibition of such actions	Awareness-raising in targeted communities by the project regarding SEA/SH-related risks and GM or other feedback mechanism to respond to complaints	GBV Specialist and Rainbo Initiative					Budgeted for Already
	Number of participants in these community awareness-raising sessions (disaggregated by sex and age, if possible)	Dissemination of information in health structures about SEA/SH prevention, prohibition of such actions in the health sector, and access to reporting and complaint mechanisms	GBV Specialist and Rainbo Initiative					Budgeted for Already
Risk of inadequate capacity of stakeholders for GBV/SEA/SH prevention, mitigation, and case management	# of trained workers who show increased knowledge after training (those who obtain a grade on the post-test of 70% or above)	Training of workers and supervisory personnel on GBV/SEA/SH, including code of conduct and GM	GBV Specialist and Rainbo Initiative S					3000
	# of capacity building programs on GBV/SEA/SH delivered to GBV Specialist and Dedicated/ Contracted Entity	Regional Training on GBV /SEA/SH risks prevention measures, CoC and GBV/SEA/SH classification tool and case management	PIU/World Bank					8,000

	# of workers who receive training regarding SEA/SH risks, including CoC and GM project feedback mechanism	National Training of stakeholders on GBV /SEA/SH risks prevention measures, CoC and GBV/SEA/SH classification tool and case management	GBV Specialist and Rainbo Initiative					5000
	# of community leaders, local service providers, focal persons and GBV/SEA/SH committee members trained on GBV/SEA/SH risks prevention measures and CoC	At community level, training on GBV /SEA/SH risk prevention measures, case management and CoC	GBV Specialist and Rainbo Initiative					3000
Risk of government Institution not capacitated to provide the needed services for GBV/SEA/SH survivors	Approved TOR	Preparation of TOR to outsource Non-Governmental Service Provider	GBV Specialist and World Bank					200
Risk of inadequate institutional collaboration and commitment in support of GBV/SEA/SH prevention, mitigation and management	Approved and signed MOU	Preparation and signing of MOU between the FSRP and Ministry of Gender and Children’s Affairs	GBV Specialist					35,000
Risks of inadequate information on specialized GBV/SEA/SH service provider and their distribution across project operation areas	Updated list of Service Providers, their contacts and functional areas/s	Updating the list of existing Service Providers	GBV Specialist and Rainbo Initiative					300

Risk of not tracking and recording GBV/SEA/SH implementation progress and achievement	# of M&E reports	Develop and implement the M&E framework	GBV Specialist, M&E Specialist and Rainbo Initiative					1000
<b>Sub Total</b>								<b>61,500</b>
<b>Total</b>								<b>113,700</b>
<b>Contingency 5% of Total Budget</b>								<b>5,685</b>
<b>Grand Total</b>								<b>119,385</b>

## ANNEXES

### Note to the Employee/Contractor/Implementing Partner/Bidder:

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

The **Employee/Contractor/Implementing Partner/Bidder** shall initial and submit the Code of Conduct form as part of its contract/bid.

### Annex 1: Individual Code of Conduct

#### Preventing GBV/SEA/SH in FSRP 2 Implementation

I, \_\_\_\_\_, acknowledge that adhering to environmental, social health and safety (ESHS) standards, following the project’s occupational health and safety (OHS) requirements, and preventing gender-based violence (GBV) and violence against children (VAC) is important.

The project considers that failure to follow ESHS and OHS standards, or to partake in GBV or VAC activities—be it on the work site, the work site surroundings, or the surrounding communities—constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of contracts, MOU and employment. Prosecution by the Police of those who commit GBV/SEA/SH or VAC may be pursued if appropriate.

I agree that while working on the project I will:

1. Attend and actively partake in training courses related to ESHS, OHS, HIV/AIDS, GBV and VAC as requested by my employer.
2. Adhere to a zero-alcohol policy during work activities, and refrain from the use of narcotics or other substances which can impair faculties at all times.
3. Consent to Police background check.
4. Treat women, children (persons under the age of 18), and men with respect regardless of race, gender, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.



5. Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
6. Not engage in sexual harassment – for instance, making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct, of a sexual nature, including subtle acts of such behavior (e.g. looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; giving personal gifts; making comments about somebody’s sex life; etc.).
7. Not engage in sexual favors – for instance, making promises or favorable treatment dependent on sexual acts – or other forms of humiliating, degrading or exploitative behavior.
8. Not participate in sexual contact or activity with children – including grooming, or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
9. Unless there is the full consent<sup>7</sup> by all parties involved, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex – such sexual activity is considered “non-consensual” within the scope of this Code.
10. A Service Provider’s Personnel comment on the appearance of another Service Provider’s Personnel (either positive or negative) and sexual desirability.
11. When a Service Provider’s Personnel complains about comments made by another Service Provider’s Personnel on his/her appearance, the other Service Provider’s Personnel comment that he/she is “asking for it” because of how he/she dresses.
12. Unwelcome touching of a Service Provider’s Personnel or Employer’s Personnel by another Service Provider’s Personnel.
13. A Service Provider’s Personnel tells another Service Provider’s Personnel that he/she will get him/her a salary raise, or promotion if he/she sends him/her naked photographs of himself/herself.
14. Consider reporting through the GRM Committee or to the Project Safeguards Unit any suspected or actual GBV/SEA/SH or VAC by a fellow worker, whether employed by the project or not, or any breaches of this Code of Conduct.

With regard to children under the age of 18:

15. Wherever possible, ensure that another adult is present when working in the proximity of children.
16. Not invite unaccompanied children unrelated to my family into my home or workplace unless they are at immediate risk of injury or in physical danger.
17. Not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography.
18. Refrain from harmful physical punishment.

19. Refrain from hiring children for domestic or other labor below the minimum age of 14 unless national law specifies a higher age, or which places them at significant risk of injury.
20. Comply with all relevant local legislation, including labor laws in relation to child labor and World Bank’s safeguards policies on child labor and minimum age.
21. Take appropriate caution when photographing or filming children.

### **Use of children's images for work related purposes**

When photographing or filming a child for work related purposes, I must:

22. Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.
23. Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. In addition, explanation on how the photograph or film will be used is a must.
24. Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
25. Ensure images are honest representations of the context and the facts.
26. Ensure file labels do not reveal identifying information about a child when sending images electronically.

### **Sanctions**

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

1. Informal warning.
2. Formal warning.
3. Additional Training.
4. Loss of up to one week’s salary.
5. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
6. Termination of employment.
7. Report to the Police if warranted.

*I understand that it is my responsibility to ensure that I will avoid actions or behaviors that could be construed as GBV/SEA/SH or VAC. Any such actions will be a breach to this Individual Code of Conduct. I do hereby acknowledge that I have read the foregoing Individual Code of Conduct,*

*do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to GBV/SEA/SH and VAC issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to take action mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment/contract/MOU.*

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

Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

**Annex 2: Gender Based Violence Monitoring Checklist**

Region: \_\_\_\_\_ District: \_\_\_\_\_  
 Community/Location of Subproject: \_\_\_\_\_ Date: \_\_\_\_/\_\_\_\_/\_\_\_\_  
 Name/ type of Subproject: \_\_\_\_\_

No	COMPLIANCE ISSUES	YES	NO	SCORE Yes=1 No=0	CORRECTIVE FOLLOW-UP ACTIONS RECOMMENDED
GBV/SEA/SH CHECKLIST					
1.	Community sensitized on the GBV/SEA/SH provisions of the project e.g., what constitutes GBV/SEA/SH, GM platforms/ channels for reporting GBV Code of Conduct				
2.	Sensitization program considers the special needs of women, vulnerable				
3.	GBV Code of Conduct signed by staff				
4.	PWDs can access the venue				
5.	Interpreter engaged for the hearing impaired				
6.	Toilet facility available and separated by sex at site				
7.	Females from qualified households are given equal opportunity to enroll as the males				
8.	Females have equal access to their cash grants as males				
9.	Females from beneficiary households have equal access to other SPIs s men				
10.	GBV IEC materials displayed on the site				
11.	Community Facilitators are Knowledgeable on GBV issues				

No	COMPLIANCE ISSUES	YES	NO	SCORE Yes=1 No=0	CORRECTIVE FOLLOW-UP ACTIONS RECOMMENDED
12.	All beneficiaries aware of GBV issues				
13.	Female beneficiaries are participating in reassessment process as men				
14.	Children have not been hired for site activity				

**Annex 3: Consent Forms for Services**

**CONFIDENTIAL CONSENT FOR SERVICES**

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

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

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

Signature or Thumbprint of survivor:\_\_\_\_\_

\_\_\_\_\_  
(or parent/guardian if the survivor is under 18) \_\_\_\_\_

Date: \_\_\_\_/\_\_\_\_/\_\_\_\_\_

**Annex 4: Disclosure Form**

**CONFIDENTIAL DISCLOSURE FORM**

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

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

I, \_\_\_\_\_ (name of survivor), give my permission for the FSRP 2 Project Safeguards Specialist/assigned staff to share information about the incident I have reported to them as explained below:

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

Signature or Thumbprint of survivor: \_\_\_\_\_

(or parent/guardian if the survivor is under 18): \_\_\_\_\_

Date: \_\_\_\_/\_\_\_\_/\_\_\_\_