

FEDERAL GOVERNMENT OF SOMALIA



MINISTRY OF LABOR & SOCIAL AFFAIRS (MOLSA)

Project:

**BUILDING OPPORTUNITIES AND OUTCOMES IN SOCIAL
PROTECTION AND YOUTH EMPLOYMENT IN SOMALIA (BOOST-
YOU) (P507443)**

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

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ABBREVIATIONS & ACRONYMS

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

1. INTRODUCTION

1.1 Project Information

Somalia has made significant progress in the recent years, consolidating its federal system of governance, strengthening capacity of government institutions, and supporting inclusive private sector-led growth. Despite incremental headway on financing and building the capacity of state institutions to deliver basic services, overall service delivery remains limited, especially in areas experiencing violence and conflict. Frequent and severe climate and security-related shocks erode resilience in the context of deep poverty and food insecurity. According to the Somalia Poverty and Equity Assessment 2024, 54 percent of the population lives below the national poverty line.

Somalia established the building blocks of a national social protection program, Baxnaano, launched by the Ministry of Labor and Social Affairs (MoLSA) on behalf of Federal Government of Somalia (FGS), with support from development partners including the World Bank to tackle multiple challenges through multiple window: Regular window which addresses chronic poverty and food insecurity while enhancing the human capital of beneficiary households through a cash transfer program; Shock response window: This window supports poor and vulnerable households affected by economic shocks, particularly climate related shocks; Human Capital: This window aims to improve uptake of available human capital (health and education) services by poor and vulnerable beneficiaries; Economic Inclusion: This window aims to improve access of youth particularly women and persons with disability, to labor market opportunities.

The World Bank has financed two projects in support of Baxnaano, Safety Net for Human Capital Project (SNHCP and Shock Responsive Safety Net for Locust Response Project (SNLRP, P174065). SNHCP has supported provision of unconditional nutrition linked safety net support to 200,000 poor households, emergency cash transfers to over 650,000 households (including SNLRP beneficiaries), developed a USR, and social protection delivery systems, introduced pilots to test feasibility of a social protection led service delivery platform, co-responsibility cash transfers to promote uptake of health and nutrition services (H&N CCT) and a new youth employment intervention and supported households mitigate immediate food security issues, while also laying the foundations for human capital investment over the longer-term. The complementary SNLRP used the Baxnaano platform to deliver Emergency Cash Transfers (ECTs) to households affected by locust infestation and recently, SNHCP.

Somalia's wider social protection landscape comprises a range of donor-supported initiatives aimed at mitigating poverty, enhancing food security, and promoting economic inclusion. The

proposed Building Opportunities and Outcomes in Social Protection and Youth Employment in Somalia (**BOOST-YOU**) reinforces and complements the existing World Bank Group portfolio in Somalia while further leveraging relevant and more recent diagnostics. Building on the foundational blocks established through SNHCP and SNLRP, the proposed project will leverage the analytical work under the Somalia Social Protection Programmatic Advisory Services and Analytics (PASA): Building an Adaptive National Social Protection System (P500503). This approach will help Somalia transition from humanitarian relief to a long-term development programming, investing in human capital for sustainable and equitable economic growth.

The Building Opportunities and Outcomes in Social Protection and Youth Employment in Somalia (**BOOST-YOU**) will reach the poorest and most vulnerable households, with majority being female beneficiaries. To maintain high standards of service delivery and safeguard the rights and dignity of all beneficiaries, the program prioritizes the prevention of Sexual Exploitation, Abuse, and Harassment (SEAH). The SEAH Action Plan is designed to comprehensively address these risks across all projects, ensuring that beneficiaries, community members, and stakeholders have access to safe, confidential, and survivor-centered mechanisms for expressing hypersensitive Gender-Based Violence (GBV), SEA and SH complaints. This plan establishes operational measures, protocols, and a response framework to mitigate SEAH risks and promote a culture of accountability, equity, and safety throughout the program's implementation.

Addressing GBV including Sexual Exploitation and Abuse and Sexual harassment, is vital as it's recognized as a major obstacle to gender equality, peace and development. It affects women's and girl's health, educational attainment, economic productivity, and capacity to care and provide for themselves and their families. In both public and private settings, GBV limits women's and girls' mobility, agency and empowerment and inhibits economic and social development. Gender equality is essential for sustainable development as it allows women and girls to reach their full potential and contribute to their communities and economies. Addressing GBV is therefore critical to achieving many of the Sustainable Development Goals (SDGs).

In providing financial and technical support to the Federal Government of Somalia, the World Bank Group pays close attention to risks that can undermine development impact of its assistance. A set of policies and procedures have been developed to address specific risks such as fiduciary (the risk that the financing could be misused) and negative social and environmental impacts.

Gender-based violence (GBV) and in particular sexual exploitation and abuse and sexual harassment, is one of the most pernicious types of risk that the WBG is deeply concerned about

worldwide and is stepping up its efforts to address these in its operational environment. This concern is also relevant for this project focusing on the poor community, where there is a high representation of women and girls who may be at risk of varying types of GBV, including sexual violence, sexual exploitation and abuse, sexual harassment, denial of services and psychological abuse if preventive and risk mitigation measures are not put in place by the Government.

This SEA/SH prevention and response action plan details the necessary operational measures and protocols that will be put in place to address gender-based violence (GBV), sexual exploitation and abuse (SEA) and sexual harassment (SH) that are project-related and how they will be integrated over the life of the project. This includes how to address any SEA/SH allegations that may arise and procedures for preventing and responding to SEA/SH. The action plan includes an accountability and response framework, which details how allegations of SEAH will be handled (investigation procedures) and disciplinary action for violation of the Code of Conduct (CoC) by workers.

1.2 SEA/SH Action Plan Purpose and Objective.

The objectives of the SEA:SH action plan is summarized below

- (i) To provide tools and frameworks that will support the Building Opportunities and Outcomes in Social Protection and Youth Employment in Somalia (BOOST-YOU) Project Implementing Committee (PIU) in preventing, mitigating and responding to the Project-induced SEA/SH and GBV risks.
- (ii) To develop protocols that will be adopted to manage any SEAH allegations that may arise during implementation of the Building Opportunities and Outcomes in Social Protection and Youth Employment in Somalia BOOST-YOU project.
- (iii) To provide procedures for preventing, mitigating and responding to SEA/SH, how complaints of SEA/SH will be handled in a survivor-centered manner, and disciplinary action for violation of the Code of Conduct (CoC) by all project workers and personnel.
- (iv) To inform affected community groups of the project' related SEA and SH risks as well as consulting and sensitizing them about the project' risks mitigating measures.

1.3 Definition of Concepts

- i. **Gender Based Violence:** GBV is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially-ascribed gender differences. GBV includes acts that inflict physical, mental, sexual harm or suffering; threats of such acts; and coercion and other deprivations of liberty, whether occurring

in public or in private life.¹ GBV broadly encompasses physical, sexual, economic, psychological/emotional abuse/violence including threats and coercion, and harmful practices occurring between individuals, within families and in the community, at large. These include sexual violence, domestic or Intimate Partner Violence (IPV), trafficking, forced and/or early marriage, and other traditional practices that cause harm.²

- ii. **Sexual Abuse:** Sexual abuse refers to the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.³
- iii. **Sexual Harassment:** Sexual harassment is defined as any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.⁴ It occurs between personnel/staff and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature.
- iv. **Sexual Exploitation:** Sexual Exploitation is defined as any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.⁵
- v. **The Survivor-Centred Approach:** The Survivor-Centred Approach is based on a set of principles and skills designed to guide professionals—regardless of their role in their engagement with survivors (predominantly women and girls but also men, boys, and gender minorities) who have experienced sexual or other forms of violence based on their gender.⁶

1.4 Approach and Methodology

The plan was prepared using the methodology below.

- (i) Literature review of World Bank guidelines, global and national laws and policies on GBV-SEA/SH.
- (ii) Identification of potential project-induced GBV-SEA/SH risks related to BOOST-YOU interventions.
- (iii) Development of mitigation measures which included an assessment and plan for strengthening capacity of project workers and personnel to be engaged under the

¹ Good Practice Note on Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works

² The Inter-Agency Standing Committee-IASC)

³ Good Practice Note – Addressing SEA/SH in IPF Involving Major Civil Works

⁴ Ibid

⁵ Ibid

⁶ Ibid

BOOST-YOU project.

- (iv) Identification of key actions to be taken, such as institutions responsible and time frames for the implementation of each of the identified actions.

2. LEGAL FRAMEWORK AND GAP RELATED TO SEAH AND GBV

2.1 Somalia Context

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

The same is witnessed in Somaliland, where “Xeer remains the main source of law, especially in remote and rural areas where government presence is scarce.” ¹The Xeer is made by clan leaders or elders, selected for their assumed wisdom, courage, experience and knowledge to arbitrate disputes and deliver verdicts.

Statutory laws introduced during the colonial era and after independence were disdained and seen to be incompatible with the nature and norms of Somali society. There was an overwhelming and paramount preference for customary law over statutory law by politicians, who mainly happen to be the clan elders or men from major clans.

Table 1: Somalia Laws

Principle	Details
The Provisional Constitution of Somalia (2012)	<p>The constitution stipulate general principles of human rights accorded to all Somali citizens. Under these Titles, there are 31 Articles that specify the fundamental rights accorded to all Somali citizens and those set out for permissible limitation on rights provided.</p> <p>Relevant articles are:</p> <p>Article 10: protects human dignity.</p> <p>Article 11: protects equality of all citizens regardless of sex, religion, social or economic status, political opinion, clan, disability, occupation, birth or dialect.</p> <p>Article 15: protects liberty and security of the person, including freedom from all violence against women including Female Genital Mutilation (FGM), which is explicitly prohibited.</p> <p>Article 27: protects social and economic rights.</p> <p>Articles 34 and 39: guarantees access to courts and redress for violations of human rights.</p>

Principle	Details
The 1962 Penal Code	The 1962 Penal Code is still current law in the legislation that addresses GBV. It criminalizes rape (Article 298) and other forms of sexual violence, such as sexual exploitation and abuse and sexual harassment as well as forced prostitution (Article 408). Articles 398–9 provide that ‘carnal intercourse’ and ‘acts of lust committed with violence’ are punishable with 5–15 years’ and 1–5 years’ imprisonment respectively. However, crimes are too narrowly defined in accordance with international law standards of protection from GBV. Furthermore, the legislation contains no age of consent. This omission leaves children particularly vulnerable to abuse.
Rape, fornication and other related offences bill-law no.78/2020-Somaliland	The House of Representatives in September 2020 passed the Rape, Fornication and other Related Offences Bill-Law No. 78/2020. Article 11 of the Act address Sexual Harassment and Assault, it provides that “Any Mature and mentally sane individual who inappropriately touches a person other than their spouse, or compels a person to touch him/her inappropriately, or forces to touch another person inappropriately, has committed a criminal act of unwelcome sexual advances and inappropriate touching and is liable to a penalty of 1-3 years of imprisonment. If the criminal act stated in Paragraph 1 of this Article, is committed against a minor, or a vulnerable person, the offender will be liable to 3-5 years of imprisonment”. The Law does not provide any details of legal age of a minor in Somalia or sex consent. However, according to the Family Code (1975), the legal age for marriage in Somalia is 18 for both men and women. This law is applicable in Somaliland only.

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

Key bills have been drafted to criminalize sexual offences and FGM/C, although as yet they have not been legislated across all regions. The Sexual Offences Bill, which criminalizes a wide range of sexual offences, has been legislated in Puntland and Somaliland, and successfully used in the former, but is yet to be legislated by the Federal Government of Somalia.⁷ There remains gaps in both legislative protections and in enforcement of law and administration of justice in relation to sexual violence, and survivors and their families

⁷ International Alert/CISP (2015)

seriously undermine the protection of women and girls from GBV which continue to face significant barriers in accessing the formal justice system in Somalia. While statutory legal protections against GBV in Somalia have been strengthened in recent years, statutory judicial structures overlap with the customary system⁸ and remain governed by traditional cultural systems that seek to preserve social stability between communities and families over an individual's rights.

In Somaliland, statutory law has largely left matters within the field of family law to be resolved through Shari'a law.⁸ In 2018, the Somaliland government took significant steps by drafting and announcing the possibility of adopting the Sexual Offences Bill (SOB). However, to date there has been no progress toward actually integrating the bill into the Somaliland criminal code. Rather the Sexual Offences Bill has undergone significant changes and may not be very effective, if implemented.

2.2 International Legal Instruments

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

2.3 The WB Good Practice Note

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

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

⁸ A Policy Paper by the Strategic Initiative for Women in the Horn of Africa (SIHA Network) November 2020

improving safety of, and consultations with, women and girls throughout the project.

2.4 Key Principles of World Bank Good Practice Note

1. Survivor-Centered Approach

- The rights, needs, and wishes of the survivor are prioritized.
- Ensures confidentiality, safety, respect, and non-discrimination in all responses.

2. Confidentiality

- Information about SEA/SH incidents is shared strictly on a need-to-know basis and only with the survivor's informed consent.

3. Safety and Security

- Protect survivors, witnesses, and those involved in managing SEA/SH cases from retaliation or harm.

4. Non-Discrimination and Equity

- All survivors—regardless of gender, age, disability, ethnicity, or status—have equal access to services and protection.

5. Accountability and Transparency

- Clear responsibilities, reporting channels, and oversight mechanisms are established to prevent and respond to SEA/SH.

6. Prevention through Awareness and Training

- Ongoing training, awareness campaigns, and community engagement to prevent SEA/SH at all levels.

7. Access to Safe and Ethical Reporting Mechanisms

- Multiple, accessible, and confidential channels are provided for survivors or witnesses to report SEA/SH concerns safely.

8. Coordination and Collaboration

- Close coordination among the PIU, Implementing Partners, GBV service providers, and relevant government institutions to ensure effective response and referral.

9. Do No Harm Principle

- All actions taken to address SEA/SH must avoid causing further harm or trauma to survivors or communities.

10. Integration into Project Design and Implementation

- SEA/SH risk prevention, mitigation, and response measures are integrated into project planning, staffing, procurement, and supervision processes.

3. SEAH PREVENTION AND RESPONSE ACTION PLAN

The project development objective of the project is to enhance economic opportunities and strengthen resilience of the poor and vulnerable. The Project has the following components:

Component 1: Connecting Youth and Women to Better Jobs Today

Component 1 will support 28,000 youth aged 18-29 years (60% women and 5% people living with disability) to access wage and self-employment activities contributing directly to inclusive job creation and economic resilience. Targeting will be based on objective criteria using information available within the Unified Social Registry (USR). Which will include indicators on age, gender, location (including climate vulnerability considerations), disability, and welfare scores generated through the USR. The Component will have two pathways:

Component 2: Investing in People for Better Jobs Tomorrow

Component 2 forms the cornerstone of the project's direct support to vulnerable households by integrating social protection with human capital development, climate resilience, and future job readiness. Utilizing a multisectoral approach for best outcomes, the component includes three subcomponents designed to address different aspects of human capital development and resilience through cash transfers. The cash transfer program will be geographically concentrated around schools and health centers in areas of high climate vulnerability to maximize their complementarity and therefore impact linking social assistance to the building blocks of a productive, inclusive, and climate-resilient workforce, with the ultimate aim of building inclusive and sustainable jobs of the future.

Component 3: Adaptive Social Protection Systems and Project Management

Component 3 supports three key areas crucial for the long-term sustainability and effectiveness of social protection interventions in Somalia (including Somaliland): the enhancement of an adaptive social protection system, the National Socio-Economic Survey and project management including institutional capacity building for FGS's social protection program management and new systems as well as capacities at Ministry of Labor, Social Affairs and Family (MoLSAF). The focus on adaptive systems reflects a forward-thinking approach, preparing Somalia's social protection framework to respond swiftly and effectively to changing needs and unforeseen shocks, including shocks that threaten jobs and livelihoods. A key focus will be on further expanding the already robust citizen engagement function and enhance the social accountability processes through the delivery systems, USR, M&E, and GRM.

3.1 Contextual GBV Risks

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

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

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

3.2 Potential Project-related SEA/SH Risks

The project’s scope, the Social Risk and the vulnerability of its beneficiaries, the SEA/SH risk is classified as **Substantial**, in line with the World Bank SEA/SH Risk Rating Framework and highlighting the need for strong prevention and response measures. There is the possibility of increased risk of GBV-SEA/SH committed against women and children in situations of poverty, hunger, conflict, insecurity and displacement. Women’s lack of access

to and control of assets, services and income increases their economic dependence as well as their vulnerabilities to abusive and exploitative situations. Food or cash assistance may also unintentionally contribute to SEA. Special safeguards need to be put in place to ensure that these risks are averted and or mitigated and redressal mechanisms put in place.

For the Building Opportunities and Outcomes in Social Protection and Youth Employment in Somalia (BOOST-YOU) potential GBV cases will be triggered through:

- Cases of SEA through the exchange of sexual favors in exchange for registration or transfer of funds,
- The spousal abuse to receive cash are the key points of GBV/IPV risks for the project.
- Risk related to female recipient of the mobile payment who not have control over the phone asset used for delivery - this can increase exposure to male relatives or even senior women in the household and or even the exposure to SEA from vendors and staff etc.
- Risks of SEA and gender-based discriminatory behaviors during the selection of beneficiaries.
- Risks of SEA and gender-based discrimination during the distribution of social safety nets by partners to poor and vulnerable households/women beneficiaries
- Indirect risks of GBV particularly an increase in intimate partner violence (IPV).
- Risks of SEA/SH in the selection of beneficiaries and the implementation of communication activities targeting community groups
- Management of project's opportunities/services carries SEA risks, as project staff could abuse their authority by offering access to project's opportunities/services in exchange for sexual relations.
- Unsupervised project's activities may lead to gender-based discrimination, harassment, or sexual abuse among beneficiaries, particularly affecting refugee women due to their heightened vulnerability in Somalia.
- Selection for economic inclusion programs, access to vocational training, and individual grants for income-generating activities or business support may expose beneficiaries to EAS risks. Project staff could exploit their power by demanding sexual relations in exchange for access to project opportunities.

3.3 Key Mitigation Measures to Address GB/SEAH Risks

To properly manage the risks of SEA and SH inherent in project activities, specific actions must be implemented to mitigate these risks. The action plan details precise risk mitigation measures and the budget for their operationalization. The project will adopt below discussed approach to address potential GBV-SEA/SH risks are as follows:

3.3.1 During the Identification and Assessment Phase

- Conduct GBV risks assessments at project sites. GBV risk assessments will be conducted by MoLSA PIU Safeguards team using the safety audits methodology before commencement of the BOOST-YOU.
- MOLSA must put in place solid and effective protocols to counter SEA/SH risk in the selection of beneficiaries.
- Ensure that the project's Social Safeguards Specialist provides continuous technical support for the implementation and monitoring of the SEA/SH action plan, in coordination with the World Bank's GBV and Environmental and Social Safeguards Specialists.
- Provide training to project teams (Project Management Unit, implementing partners, and service providers) on the World Bank's Environmental and Social Framework, particularly the "Good Practice Note on Preventing and Responding to Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Human Development project" (2022).
- Ensure the Project Implementation Unit (PIU) has specialized staff trained to lead prevention, coordination, and monitoring of gender-based violence (GBV). A national GBV consultant should be recruited before project activities begin.
- Map local actors involved in preventing and combating GBV in project-affected communities. Assess their capacity to provide survivor-centered services, including case management, advocacy, and referrals to other services. Review and update of GBV service providers⁹: The project will review and update GBV service providers mapping in each location for timely referral of GBV survivors to provide relevant services based on survivors' needs will be identified. The MoLSA staff (PIU/GRM) will all be informed of the actors working in different project locations. The list of service providers will be mapped out before the commencement of any activities and will inform on key gaps where remedial measures may be required.
- Ensure the Code of Conduct is understood and discussed by PIU staff, subcontractors, workers, and local communities. The code explicitly addresses unacceptable behaviors and consequences for SEA and SH violations.
- Sensitization of PIU and community on SEA/SH risks and reporting protocols.
- Detail accountability and response procedures for handling SEA/SH allegations, including investigation processes, disciplinary measures, internal reporting procedures, survivor referral mechanisms, and confidentiality protocols.
- Establishment of a Reporting Protocol including Accountability and Response framework. A survivor-centered SEA/SH reporting Protocol will ensure timely and safe reporting of SEA/SH incidents. Beneficiaries and communities should be informed of the availability of varying channels of reporting for allegations related to GBV-SEA/SH. This will be made explicit in all community awareness sessions, as well as be part of the publicly disclosed information.

⁹ Somalia Referral Pathway

To strengthen the project's GBV/SEA/SH prevention and response mechanisms, a Project's Liaison Officers will be designated by the PIU and Implementing Partners (IPs). The Liaison Officer will serve as the focal point for receiving and managing GBV/SEA/SH-related complaints at the field level, ensuring that survivors are referred safely and confidentially through established pathways. The GBV Specialist will provide technical guidance by defining the Liaison Officer's specific roles and responsibilities, and will conduct targeted training to build their capacity on survivor-centered approaches, reporting protocols, and coordination with grievance redress and service providers

Project's Liaison Officers will focus on below listed,

- Communities, including children, are aware of the risks of GBV, their rights and the mechanisms available to them to report GBV cases;
- Referral pathways in place and functional;
- Appropriate GBV services and referral pathways are provided to survivors and accountability processes are followed;
- Monitor project areas actively to ensure compliance with norms and measures. A monitoring framework should be implemented by the Environmental and Social Safeguards Specialist.
- Develop awareness campaigns for targeted communities and train local leaders and authorities on women's rights, GBV, and SEA/SH risks.
- Consult stakeholders (political, cultural, and religious authorities, health teams, local administrations, social workers, women's organizations, and child-focused groups) at the start and throughout the project to gather feedback on SEA/SH risks and project design.
- Ensure women, girls, and organizations supporting them participate meaningfully throughout the project cycle. Include SEA and SH issues in the Stakeholder Engagement Plan (SEP) to keep local populations informed.
- Engage an independent third-party monitor (e.g., civil society organization, local/international NGO, university, or private firm) with expertise in GBV to oversee the implementation of the SEA/SH prevention and response action plan.
- Collaboration with institutions at national and sub-national levels on the GBV response by involving the relevant Government units such as the Ministry of Women and Human Rights Development (MoWHRD) in the strengthening of the GBV package of services and referral system in project areas. To this end, the project will strengthen the reporting mechanism and procedures of local systems to ensure a survivor centered referral and response.

3.3.2 During Procurement

- Clearly define SEA/SH requirements and expectations in tender documents.
- Include SEA/SH provisions in tender documents to ensure contractors adopt a Code of

Conduct addressing these issues.

- Consider applying international tender requirements for SEA/SH prevention in national competitive bidding processes.
- Specify how SEA/SH-related costs will be covered in contracts (e.g., budget lines for prevention activities or provisional funds for unforeseen needs).
- Explain the Code of Conduct to bidders before they submit proposals.
- Assess the contractor's accountability framework for SEA/SH and confirm their capacity to meet project requirements before finalizing contracts.

3.3.3 During Project Implementation

- Review the Environmental and Social Management Plan (ESMP) to ensure appropriate mitigation measures are included.
- Verify that the GRM receives and processes complaints diligently, following established protocols for SEA/SH cases.
- Disseminate the Code of Conduct (including visual illustrations) and discuss it with employees and local communities.
- Sensitization and training all project staff on expectations around SEAH. PIU, will ensure that their direct workers, partners, sub-contractors, suppliers and those appointed as SEA focal points are trained in CoCs and GBV/SEA and child protection risk issues as part of their induction as well as throughout course of employment on quarterly basis. All categories of workers will be induced and will sign a Code of Conduct (CoC), which includes expected standards of behaviors regarding GBV/SEA according to the World Bank's 2017 Standard Procurement Documents (SPDs) ¹⁰. IPs will ensure that all contractors, suppliers, NGOs and other implementing partners' workers have been induced and have signed a CoC PSEA¹¹. PIU and IPs will roll out direct training activities for all contracted as well as community workers deployed for their activities – prior to the start of such.
- Communication to project affected communities about GBV/SEAH risks and mechanisms: Community awareness on GBV/SEAH, education and raising of awareness for women, adolescents and children of SEA. Project beneficiaries should be made aware of the laws and services that can protect them and provide redress in case of an incident. CoCs will be made available to the public in the project areas, especially to identified project stakeholders; to raise awareness of expected behavior of any project-related worker and mechanisms for reporting should those workers be in breach of the CoC
- Regularly monitor and evaluate progress in SEA/SH prevention and response activities, including risk reassessment as needed.

¹⁰ The World Bank has not “endorsed” a template CoC for projects. The SPDs provide guidance on the minimum content of issues to be addressed in the CoC.

¹¹ IASC (2002), Six Core Principles for Relating to Sexual Exploitation and Abuse, accessed at: <https://interagencystandingcommittee.org/principals/documents-public/iasc-six-core-principles-relating-sexual-exploitation-and-abuse-2002>

- ✓ Conducting requisite Sexual and Gender Based Violence (SGBV) trainings to the target Units / Groups
- ✓ Reviewing the adequacy of existing Contractor's SGBV policies
- ✓ Developing SGBV Framework including Reporting and Investigation procedures
- ✓ Implementing the measures outlined in the SGBV action plan

SEA/SH Action Plan indicators will include:

- Number of community-sensitization activities delivered, disaggregated by sex and age;
- 100% of workers that have signed a CoC; and/or,
- 100% of workers that have attended the CoC training.
- GBV/SEAH cases are timely referred to services for multi-sectoral response

4. GBV/SEAH MATRIX

	Objective:	TO INCREASE AWARENESS AND ENHANCE RESPONSE SYSTEMS FOR GBV, SEA AND SH INCIDENTS					
	Activity to Address SEAH risk	Steps to be taken	Timelines	Responsible	Monitoring (Who will monitor)	Output indicators	Budget (USD)
1	Define and reinforce GBV/SEA/SH requirements in procurement processes and contracts						
	Incorporate GBV/SEAH Requirements and expectations in the contractor and consultants' contracts.	Ensure that GBV/SEAH issues are incorporated in all contracts signed by contractors and consultants	Before project activities begin	MoLSA PIU- GBV Specialist, Procurement Specialist	PIU	GBV/SEA/SH standards in procurement/contract document	<i>N/A (activity to be done by the Procurement /GBV Specialists)</i>
	Allocation of funds for GBV/SEAH related costs in procurement documents.	Clearly define SEAH requirements and expectations in the bidding documents Evaluate the contractor's SEAH Accountability and Response Framework in the C-ESMP and confirm prior to finalizing the contract the contractor's ability to meet the project's GBV/SEAH prevention and response requirements.	During preparation of bid and Contract documents Monitoring on a quarterly basis	MoLSA PIU- GBV Specialist, Procurement Specialist	MoLSA / World Bank	Bid documents with clearly defined SEAH requirements Contract documents with clearly defined SEAH clauses/requirements	

	GBV Specialist	responsible for leading the implementation of all SEA/SH prevention and response measures , including risk assessment, capacity building, coordination of referral pathways, oversight of grievance mechanisms, and ensuring that all project activities adhere to survivor-centered and confidentiality principles	Before project activities begin	MoLSA	MoLSA / World Bank	<p>Number of SEA/SH risk assessments conducted.</p> <p>Number of project staff and Liaison Officers trained.</p> <p>Functional referral pathways established and regularly updated in all project areas.</p> <p>Number of GBV/SEA/SH cases safely reported and managed through the grievance redress mechanism.</p>	10,000 USD per annum
2	Review the Implementing Agencies (IA's) capacity to prevent and respond to GBV/SEA						
	Codes of Conduct signed and understood.	<p>Define the requirements to be included in the CoC which addresses GBV/SEAH</p> <p>Review CoC for provisions/clauses that guard against GBV/SEAH</p> <p>Have CoCs signed by all those with a physical presence at the project site.</p> <p>Train project-related staff on the behavior obligations under the CoCs.</p>	During Project implementation	GBV Specialist/ Social/safeguard Specialist	MoLSA / World Bank	<p>100% of workers that have signed a CoC</p> <p>100% of workers that have attended CoC training.</p>	Cost of training of the CoC. Included in the SEAH orientation training and for contractors it will be included in the C-ESMP
	Conduct GBV/SEAH	<p>Develop a training plan</p> <p>Develop training materials</p>	Quarter 1 and 2 after contract	MoLSA PIU,	MoLSA PIU, GBV Specialist	Number of trainings conducted	5,000 USD per annum

	orientation training for all workers. (Project workers), contractors and consultants	Conduct training on GBV/SEA risks, responsibilities, and legal/policy requirements Conduct training for project staff Develop reporting and accountability protocol for managing reported cases	signing Retraining during Project implementation.	GBV Specialist/ safeguard Specialist			
3	STRENGTHEN INSTITUTIONAL CAPACITY FOR GBV/SEAH RISK MITIGATION AND RESPONSE;						
	Strengthen co-ordination and collaboration at national and sub-national levels on the GBV response	Involving the relevant Government units such as the MoWHRD in the strengthening of the GBV package of services and referral system in project areas.	Quarter 2	MoLSA and PIU.	MoWHRD,	Government GBV coordination unit created	5,000 USD per annum
4	GBV/SEA SENSITIVE CHANNELS FOR REPORTING IN GM						
	Review GM for specific GBV/SEAH Procedures (SOPs)	Undertake internal review of GM for GBV/SEAH reporting channels Identify and Integrate GBV/SEAH entry points, and specific steps within the GM with clear procedures (SOPs)and tools for management of hypersensitive SEA/SH complaints	Quarter 3	MoLSA PIU, GBV Specialist/ safeguard Specialist	MoLSA	GBV/SEAH procedures integrated in the GM Variety of reporting channels for GBV/SEAH identified	N/A to be done by GBV specialist to be hired under
	Develop an information sharing protocol	The protocol will lay down the principles for data collection, management and	Quarter 2	MoLSA PIU, GBV Specialist	MoLSA	GBV/SEAH procedures integrated in the GM	N/A to be done by GBV specialist to be hired under

		storage. It will identify what kind of data should be collected by whom and for what. It will define how data should be recorded and stored by following the Data Protection Policy.				Variety of reporting channels for GBV/SEAH identified	
	Train GM Operators on key protocols: referral, reporting and confidentiality	Develop training materials on GBV/SEAH reporting for GM Operators and Liaison Officers. Conduct training of GM operators on GBV/SEAH	Quarter 2	MoLSA PIU, GBV Specialist	MoLSA	GM Operators trained on GBV/SEAH protocols	Reported under (2) above
5	ESTABLISHMENT OF A GBV/SEA REPORTING PROTOCOL AND REFERRAL PATHWAY						
	Develop key protocols for GBV-SEA/SH reporting and management	Develop and update disclosure and reporting protocol and forms for GBV/ SEA/SH with provisions for confidentiality, informed consent and survivor protection and assistance. Develop simple, anonymous and confidential forms that Project's Liaison Officers can use to document GBV-SEA/SH incidents	Quarter 1 and review periodically	MoLSA PIU, GBV Specialist	MoLSA	GBV-SEA/SH cases are timely referred to services for multi-sectoral response	A to be done by GBV specialist.
6	COMMUNICATION TO PROJECT AFFECTED COMMUNITIES ABOUT GBV/SEAH RISKS AND MECHANISMS						
	Community awareness on GBV-	Create IEC materials on GBV-SEA/SH	Quarter 1	MoLSA PIU,	MoLSA	IEC materials created and disseminated with a	budget already allocated for the

	SEA/SH and disclosure of CoC	<p>Identification of child friendly and women safety areas for disclosure of information</p> <p>IEC available to communities in the local language</p>	And during project implementation	GBV Specialist, Third party mobilization, outreach & communication firm		<p>gender perspective</p> <p>CoC available and translated</p>	firm
	Communicate GBV-SEA/SH risks and options for reporting at the community level to create GBV awareness and enable project affected women and girls to file complaints	Community awareness campaign on GBV-SEA/SH and GM reporting mechanism	Quarter 2	MoLSA PIU, GBV Specialist	MoLSA	Community awareness campaign developed in all project sites	To be expensed from similar communication item above
7	SENSITIZATION AND CAPACITY BUILDING OF PIU, GM, WORKERS, SERVICE PROVIDERS AND PARTNERS ON SEAH IN THE PROJECT						
	Codes of Conduct signed and understood. samples presented in appendices 5.2 and 5.3	<p>Review CoC for provisions/clauses that guard against GBV-SEA/SH</p> <p>Save CoCs signed by all personnel</p> <p>Train all project- related staff on the behavior obligations under the CoCs.</p>	In Quarter 1	MoLSA PIU, GBV Specialist	MoLSA	Number of workers that have signed a CoC	
	Conduct trainings for all direct workers, partners, sub- contractors,	Develop training session and materials Training should include explanation of GBV/-SEA/SH,	In quarter 1	MoLSA PIU, GBV Specialist	MoLSA	Number of workers who have attended GBV/SEAH training	5,000 USD per annum

	supplier and SEA Liaison Officers trained on GBV/SEAH	expectations for behavior and conduct, sanctions for violations, roles and responsibilities of actors involved, GBV incident report mechanism, and accountability and referral procedures.					
8	CONDUCT GBV RISKS ASSESSMENTS AT PROJECT SITES						
	Assess GBV risks in project sites	Conduct regular GBV risk assessments at all project sites, ensuring that the perspectives and experiences of women and girls are actively included to accurately identify risks and inform effective mitigation measures.	Before commencement of the project Reviewed and updated Every quarter	MoLSA PIU, GBV Specialist, Third party Monitoring & Evaluation firm	MoLSA	Safety audit reports developed in all project sites Safety audit recommendations in project sub components	budget already allocated for the firm
9	STRENGTHENING GBV SERVICES PROVIDERS						
	Assessment of capacity of GBV service providers in project sites	Mapping of existing Service Providers according to their technical capacity on GBV (according to global standards) to update existing referral pathways.	Quarter 1	MoLSA PIU, GBV Specialist	MoLSA	Report with mapping of GBV providers Number of GBV service providers contracted	expensed from item above
10	ESTABLISH A GBV/SEA ACCOUNTABILITY FRAMEWORK						
	Develop an accountability framework	Develop protocol with specific roles and responsibilities for parties on verification, investigation and management of cases	Quarter 1	MoLSA PIU, GBV Specialist	MoLSA	Accountability framework developed	N/A

		within Government and IPs Develop specific sanctions as per type of GBV violation					
11	ESTABLISH AN M&E SYSTEM OF THE GBV/SEAH PLAN						
	Develop a Supervision Plan of GBV plan	To guide oversight of project activities, ensuring that SEA/SH is integrated as a core component of the project's regular monitoring and reporting tools. PIU should report on GBV/SEAH/SH in regular progress reports	Quarter 1 Maintained throughout Project implementation.	MoLSA PIU, GBV Specialist	MoLSA and PIU	No. of supervision missions	A to be done by GBV specialist
Total							PER ANNUM 25,000 USD

5. APPENDICES

5.1 GBV/SEAH Reporting Format

GBV/SEAH Reporting Format

INCIDENT DETAILS	Remark	Guiding Notes
Type of SEA/SH-		SEA/SH (IP staff)
		Source of Complaints Survivor _____ Third Party _____
Description of the incident		Basic facts of the incident. What was reported by the complainant (in his or her own words). Is the incident related to the project?
Point of reporting		Liaison Officer, GM Operator, email, other (specify)
Where did the incident occur		District
		Region
When did the incident occur		Date
Sex		
Age		
Link of the alleged perpetrator with the project (if this information is available):		
The identity and safety of a survivor must be protected at all times. No personal data or identifying information about a survivor or their experience can be shared through this document. Personal/identifying information includes the survivor's name, perpetrator(s) name, date of birth, home address, the exact time and place the incident took place, visible disability, residence status e.g. minority		

5.2 Individual Code of Conduct (CoC) for Project Workers

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

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

I agree that while working on the project I will:

- Comply with applicable National and Company laws, policies, rules, and regulations (including policy on sexual harassment).
- Comply with applicable health and safety requirements to protect the Local Community (including vulnerable and disadvantaged groups), the Employer's Personnel, and the Contractor's Personnel (including wearing prescribed personal protective equipment, preventing avoidable accidents and a duty to report conditions or practices that pose a safety hazard or threaten the environment).
- Not discriminate in dealing with the local community and all co-workers. Treat women, children (persons under the age of 18), and men with respect regardless of race, ethnicity, language, religion, political or other opinions, national, ethnic or social origin, property, disability, birth or other status
- Not sexually abuse children (anyone age 18 or under)– including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
- Not commit Sexual Harassment (for example prohibition of the use of language or behavior, in particular towards women, children or men, that is inappropriate, abusive, sexually provocative, demeaning or culturally inappropriate).
- Not commit gender-based violence (for example acts that inflict physical, mental or sexual harm or suffering, threats of such acts, coercion, and deprivation of liberties).
- Not engage in any form of sexual exploitation or abuse including sexual exploitation and abuse (for example the prohibition of the exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliation, degrading behavior exploitative behavior, and abuse of power). This includes any project-related assistance due to community members. Sexual exploitation and sexual abuse constitute acts of serious misconduct and are therefore grounds for disciplinary measures, including

summary dismissal;

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

Violations and Sanctions

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

Types of Violation	Types of Sanctions
<ul style="list-style-type: none">• Discrimination, Intimidation, or Violence	<ul style="list-style-type: none">• Oral warning;
<ul style="list-style-type: none">• Fraud, Conflict of Interest, and Abuse of Power	<ul style="list-style-type: none">• Written warning;
<ul style="list-style-type: none">• Sexual Exploitation, Abuse, and Gender-Based Violence (SEA/GBV)	<ul style="list-style-type: none">• Additional training
<ul style="list-style-type: none">• Harassment, Abuse, and Workplace Relations	<ul style="list-style-type: none">• Loss of up to one week's salary;
<ul style="list-style-type: none">• Children's Rights	<ul style="list-style-type: none">• Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months;
<ul style="list-style-type: none">• Use of Drugs	<ul style="list-style-type: none">• Termination of employment; and
<ul style="list-style-type: none">• Use of Project Assets	<ul style="list-style-type: none">• Report to the police if warranted.

<ul style="list-style-type: none"> • Duty of Discretion and Confidentiality 	
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I hereby acknowledge that I have read the foregoing Individual Code of Conduct, agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS, GBV and VAC issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to take action mandated by this Individual Code of Conduct may result in disciplinary action and may affect my on-going employment.

Signature
.....**Name**.....

Title
.....**Date**.....

FOR CONTRACTOR’S PERSONNEL

I have received a copy of this Code of Conduct written in a language that I comprehend. I understand that if I have any questions about this Code of Conduct, I can contact [enter name of Contractor’s contact person with relevant experience in handling gender-based violence] requesting an explanation.

Name of Contractors personnel:

Signature:

Date:

Countersignature of authorized representative of the Contractor:

Signature:

Date:

5.3 GBV Training Module

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

At a minimum, training shall include:

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

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

Modality, frequency and content of training's

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

5.4 SEAH Case Registration Form

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

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