

Republic of The Gambia



Ministry of Higher Education, Research, Science & Technology

**The Second Africa Higher Education Centers of Excellence for Development Impact Project
(P169064)**

GRIEVANCE REDRESS MECHANISM (GRM)

November 2021

1. PURPOSE

A Grievance Redress Mechanism is an accessible and inclusive system, process, or procedure that receives and acts upon complaints and suggestions for improvement in a timely manner and facilitates resolution of concerns and grievances arising in connection with a project. An effective Grievance Redress Mechanism provides Project-Affected Parties with an opportunity to address issues at an early stage and also provides a clear outcome or resolution.

To respond to concerns and grievances of Project-Affected Parties (PAPs) related to the environmental and social performance of the project, the following Grievance Redress Mechanism is proposed to receive and facilitate resolution of such concerns and grievances. The document provides below, specific procedures to manage Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) complaints ethically and confidentially, accompanied by an appropriate response protocol in Annex B.

It is anticipated that some of these concerns may include eligibility criteria for project opportunities, loss of livelihood or properties and use of land. The mechanism for grievance redress shall thus include:

- Provision for the establishment of a grievance redress committee (see GRC members below)

Grievance escalation model

The Grievance Redress Mechanism is designed with the objective of resolving disputes at the earliest possible time before they escalate. Project-affected persons should be heard and be able to voice concerns, and as such, they must have access to fair, transparent, and accessible means to address their concerns and views related to the project. Furthermore, the mechanism should be effective in addressing project complaints and concerns at project-level so that grievances are not referred through the court system for resolution, which is often not timely nor financially feasible or accessible to all. A functioning, inclusive and accessible Grievance Redress Mechanism is essential for social sustainability of the project.

2. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

a. Human Resources and Implementation

The MoBSE PCU Environmental and Social Safeguard specialists (Hannah L. M. Njie and Maimuna A.M Sallah), will help the Environmental and Social Focal Points appointed at GTTI to conduct stakeholder outreach during project implementation and respond to any grievances or complaints that may arise. The Environmental and Social Focal Point at GTTI will be the Community Liaison Officers (CLOs) as the location of the site is in the urban area where monitoring will be frequent due to close proximity with the office. The two CLOs will act as key points of contact to bring project grievances from PAPs, stakeholders, construction workers, residents, and community members to the Grievance Redress Committee (GRC). The CLOs will be responsible for making sure the recommendations of the GRC are implemented through all phases of the project and direct contractors to make any appropriate adjustments to their works. The contractor shall take actions to address grievances.

b. Management Functions and Responsibilities

During the implementation phase of the Project, the Grievance Redress Committee shall include:

- Establishing a Grievance Redress Committee (GRC). MoHERST will determine a sitting allowance for GRC members.
- Multiple grievance uptake locations and multiple channels for receiving grievances (for example: GTTI Director General Office, MoBSE PCU office, Gambia College Authorities, Students and houses affected in the communities.

- Fixed service standards (transparency, fairness, accountability, timeliness) for grievance resolution and adjudication process.
- Prompt and clear processing guidelines: including reviewing procedures and monitoring system.
- A time frame for responding to grievances.
- A reliable and effective reporting and recording system (grievance register, complaints logbook – both hard copy and e-copy).
- A clear and transparent procedure for assessing and responding to the grievance.
- Capacity building of both actors working in the GRM and among contractors and community of how the GRM works.
- Development of specific and separate survivor-centered GRM procedures for the ethical and confidential management and resolution of GBV, including SEA, SH, and VAC complaints.

3. ROLES AND RESPONSIBILITIES

- a. The Grievance Redress Committee (GRC) will be responsible for receiving and resolving complaints in a fair, objective, accountable, effectively, timely and accountable manner in all phases of the project lifecycle.

The broad responsibilities of the GRC with assistance from MoHERST include:

1. Developing and publicizing the grievance management procedures
 2. Receiving, reviewing, investigating, and keeping track of grievances
 3. Adjudicating grievances
 4. Monitoring and evaluating the fulfilment of agreements achieved through the Grievance Redress Mechanism.
- b. **Community liaison officers (CLOs):** GTTI office of the Director General will appoint as community liaison officers (CLO) two focal points; **an environmental focal point and a social focal point**. Their contact information will be published and communicated via public announcements and information sharing about the project, (radio, mosques, and community meeting etc.), to conduct stakeholder outreach during project implementation and respond to any grievances or complaints that may arise. The CLOs will act as the point of contact to bring project grievances from project affected people, construction workers, residents, and community members to the GRC. The CLOs will be responsible for making sure the recommendations of the GRC are implemented and directing GTTI office of the Director General during ESMP implementation, and contractors to make any appropriate adjustments to their works. The contractor shall take actions to address grievances.

In addition to the community liaison officer, the project will make available grievance forms at the Gambia College and nearby communities (Students, Governor's office) as an accessible venue for filing a grievance. At least every week or two, Community liaison officers will collect forms filled out to submit them to the GRC.

To ensure confidentiality, the Project will enforce the implementation of the World Bank Codes of Conduct which will be filled out by Project staff prior to starting of the Civil Works. The Project will issue a code of conduct form to fill out by the Project staff, students, Gambia College Authorities, and liaison officers based on the World Bank Codes of Conduct. The PCU safeguards team will monitor closely the implementation of the codes of conduct by the Contractor and the Project.

- c. **The contractor:** During the implementation, Contractors, their staff, and all workers related with the Project must comply with the World Bank standards on Environmental, Social, Health and Safety (ESHS) and Occupational Health and Safety (OHS) in the workplace and conduct with affected communities. The application of a Code of Conduct will help ensure the project meets its ESHS and OHS objectives, as well as preventing and/or mitigating the risks of GBV, including SEA/SH and VAC. The Project and Contractors should make sure the Code of Conduct is signed, behaviors monitored and adopted by those working on the project. The Contractors are responsible for:
- Creating awareness of the ESHS and OHS expectations on the project.
 - Creating common awareness about SEA/SH and VAC and ensure a shared understanding that they have no place in the project; and create a clear system for receiving, responding to, and sanctioning SEA/SH and VAC incidents as per the GRM.

The code of conduct is set for strict use and follow (see Annex A for more details):

- Individual Code of Conduct: Code of Conduct for everyone working on the project, including Managers, Contractors, workers and GTTI staff.

The code of conduct will be explained and displayed in the work sites though workers and affected communities will be sensitized prior to works start and during all the Project implementation life. *Sensitization campaigns on the GRM and Code of Conduct shall be conducted every six months for the affected community and every month for workers. These will be monitored to ensure compliance.* Every new worker will receive a training on the GRM and Code of Conduct before he or she starts working. The contractor liaison officer will work closely with the Project Community Liaison Officers to bring to the GRC all complaints.

For issues regarding SEA/SH and VAC-related claims, please see the procedures set forth below under Section 7 and the Response Protocol, which appears at Annex B.

The key objectives of the GRM are:

- Record, categorize and prioritize the grievances according to severity and immediacy of the issue, and provide timely, fair, accountable resolution to grievances at the project level.
- Settle the grievances via consultation with all stakeholders (and inform stakeholders of the solutions, obtain their views on the outcome, and ensure they understand possible next steps to escalate if they are not satisfied with the outcome).
- Forward any unresolved cases to the relevant authority.
- Regularly analyze grievances to assess if there are systemic issues in the project that should be addressed to mitigate the same types of issues being reported.

The GRM operates within the existing legal, cultural and community context framework of The Gambia. It will also take into consideration World Bank procedures and recommendations regarding complaint handling.

The details of each level of Grievance Redress Mechanism are described as follows.

a. COMMUNITY LEVEL GRIEVANCE REDRESS MECHANISM

Local communities have existing traditional and cultural grievance redress mechanisms. It is expected that some disputes at the community level may be resolved using these mechanisms, without the involvement of the Project, contractor, and or Government representatives at local and national level. In the context of the USET project, the College Authorities may be involved at this level. This may be

more suitable for issues and concerns that are minor. For example, Gambia College processes were used to determine voluntary land donation as Authorities discussed among themselves to find suitable land for the USET and then proposed the sites to MoHERST to survey before final approval. This means the land was voluntarily donated by the Gambia College Authorities to GTTI for the construction of USET.

The community and contractor will be informed that the principle of non-discrimination and fairness, including gender equality, as per the Gambian Labor Law will apply in the selection. Also, if the company wants to compensate the community for using their sand, gravel or because of the impact of its activity (dust dispersion), those grievances can be solved at the community level, without the GRC, if the community chooses.

b. PROJECT-LEVEL GRIEVANCE REDRESS MECHANISM

Many project-related grievances during the works are minor and site-specific. Often, they revolve around nuisances generated during construction such as noise, dust, vibration, workers' dispute, etc. They can be resolved easily on site. If these types of grievances cannot be resolved on site, they will request the intervention of the Grievance Redress Committee, the Chief of the area, the Alkalo of the concerned community, the Governor's representative, and the Project (GRC), land owner(s) concerned, and if required, the representative from the Ministry of Higher Education Research Science and Technology and other ministries which can assist in solving the grievance.

Grievances and complaints related to GBV, including SEA/SH, VAC, as well as child labour, from workers, contractors, and/or community members during construction phase can be addressed by the specific procedures and protocols which have been outlined below and will ensure ethical and confidential management and resolution of these claims. Most grievances cannot be resolved immediately and on site, and in the case of SEA/SH-related claims, require specific and independent interventions and processes to protect the safety, anonymity, well-being, and preferences of survivors.

4. COMPOSITION AND MEMBERSHIP OF THE GRC

MOBSE Safeguards team and the Project Community Liaison Officers (the Environmental and Social Focal Points) will receive, review, record, and address project related complaints. Every month the safeguards team (**MOBSE & GTTI**) will collect complaints to submit to the GRC. The GRC meets at least once per month, depending on the number and type of complaints received. The Alkalo and Contractor Liaison Officer will contact MOBSE PCU safeguards team in case a complaint is not resolved within one week After receiving the alert, the PCU and GTTI safeguards team will go to the field in order to obtain further information and resubmit the case to the GRC. The complainant will be notified that further information is being collected and keep that person/persons informed about the status.

These complaints will be submitted to the Grievance Redress Committee which is represented by the following permanent members:

- Rep of National Environmental Agency
- Project Manager, PCU
- Social and Environmental Safeguards Specialists
- Physical Planning Regional Officer
- Brikama Area Council
- Representative of the Women's Bureau
- Representative of Social Welfare
- USET Project Coordinator

- Governor's Office to serve as Secretary of this Grievance Redress Committee

The GRC will include a non-permanent member of the affected community. For example, if the complaint comes from Gambia College, the Gambia College Authority will become non-permanent members during the GRC meeting to represent their community.

5. GRM PROCEDURES for non-SEA/SH grievances.

The community will be informed and sensitized about the use of and existence of the GRM (through radio notices, communities, community signage, Imam and with some awareness trainings by the Environmental and Social Safeguards Focal Points and the contractor prior to the starting of the Civil Works) and of the various uptake options where complaints can be submitted.

- The Uptakes will be for example, to the GTTI Director General's Office. The GTTI safeguards team will meet every month to review all complaints.
- The complainants, within three days, will receive acknowledgement that complaints have been received and the procedures they must follow.
- The safeguards team will then organize a meeting for the GRC at the soonest to ensure compliance with the timeline for verification of the claim and responses to complainants.
- As a follow up and monitoring activity, if the identity of the person who submitted a grievance is known, the GRC must inform them within three days of the decision or when a decision is to be expected. If the complainant is not known, a notice that a grievance about a particular issue has been received will be posted within the community and the CLO will inform the community. The date of this outreach is to be logged into the grievance log.
- The GRC will commit decisions to be finalized within two weeks of date of receipt and feedback will be given to the complainants who will be notified and will record the complainants' comments about decision. If the complainant is not satisfied, they will be notified about **escalation procedures**.
 - **Notices and signage** will be erected at all sites providing the public information on the Project and summarizing the GRM process, including contact details of the relevant Project Contact Person, Contractor Liaison Officer or Community Liaison Officer. The GRM will be accessible to all persons through at multiple uptake locations and the methods (grievance forms submitted to the Project, in person, telephone) or via the contractor or Governor's office. All type of complainants should be free to lodge a complaint in one or as many of the uptake stations noted above.
 - **A Complaints Register for non-SEA/SH complaints (see Annex C)** at the GTTI Director General's Office and the Office of the Head of Gambia College (since the Project will be implemented within the college premises), the office of the Governor of West Coast Region and also the contractor. Community Liaison Officer of the contractor, and the CLOs of the GTTI who will be trained, will log the complaints:
 - Details and nature of the complaint (include categorization of sensitive/urgent, non-sensitive and for all complaints unrelated to SEA/SH).
 - The complainant's name and their contact details if known.
 - Date the complaint was received.
 - Corrective actions taken in response to the complaint.
 - The date the response was made available to the community (without identifying personal details) and the complainant.
 - The resolution.
 - The response of the complainant if response was acceptable to them or not.

- The name of the person who received the complaint and location/method the complaint was lodged. This information will be included in MOBSE PCU's progress reports to the World Bank. (See Annex C for sample Grievance log).

Each two weeks or end of month, the CLOs will monitor all uptake stations to monitor the complaints register with Gambia College Authorities and Governor's Office.

- Escalation of Grievances If the complaint is not resolved to the satisfaction of the aggrieved party by the Grievance Redress Committee, it will then be referred by the MoBSE PCU Project Coordinator to the **National Steering Committee (NSC)**.

The National Steering Committee (NSC) is composed of:

Designation	Ministry
Permanent Secretary	MoHERST
Permanent Secretary	MoBSE
Permanent Secretary	MoFEA
Deputy Permanent Secretary (Programs)	MoHERST
Deputy Permanent Secretary (Admin)	MoHERST
Director General	GTTI
Human Resource Officer	MoHERST

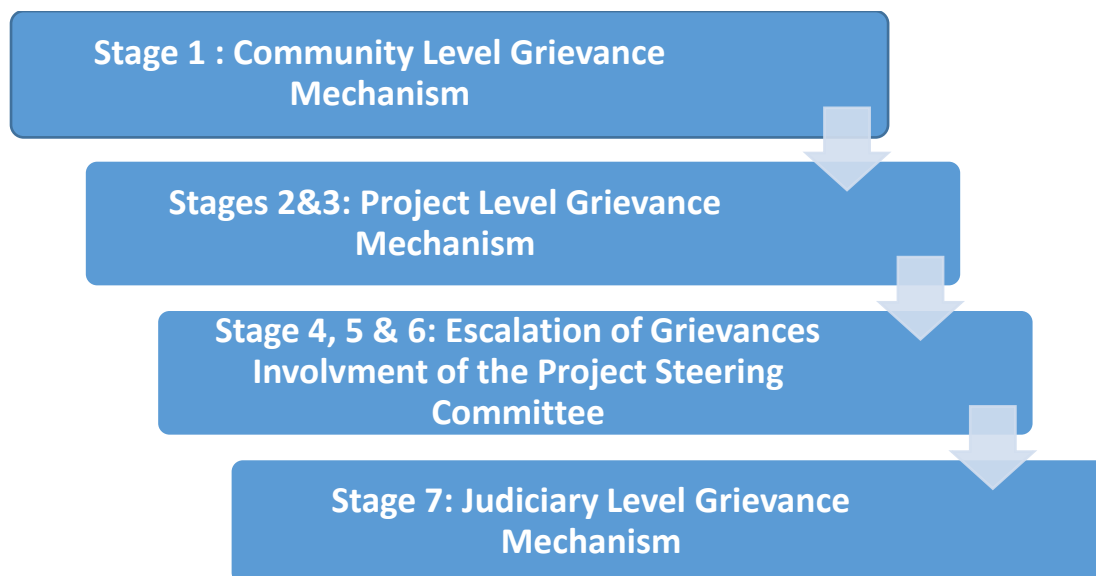
Should measures taken by the National Steering Committee fail to satisfy the complainant, the aggrieved party is free to take his/her grievance to the Gambia judicial court (District Tribunals or Magistrates Court).

6. JUDICIARY LEVEL GRIEVANCE REDRESS MECHANISM

The project level process will not impede affected persons' access to the legal system. At any time, the complainant may take the matter to the appropriate legal or judicial authority as per the laws of The Gambia. However, the quality and effectiveness of the judicial system should be assessed, as well as issues related to accessibility and affordability.

Table 1: The GRM process

Flowchart of the ACE Impact Grievance Mechanism for non-SEA/SH complaints:



Stage	Process	Duration
1	The Aggrieved Party (AP) will take his/her grievance to the project or construction site supervisor (CSS)/Contractor Liaison Officer who will endeavor to resolve it immediately. Where AP is not satisfied, the CSS or CLO will refer the AP to the Project's Contact Person (PCP). For complaints that were satisfactorily resolved by the CSS/CLO, he/she will inform the PCP and the PCP will log the grievance and the actions that were taken.	Anytime
2	On receipt of the complaint, the Project PCP will endeavor to resolve it immediately. If unsuccessful, he/she then notifies PCU Project Coordinator	After logging grievance
3	The PCU Project Coordinator will endeavor to address and resolve the complaint by submitting it to the GRC and inform the aggrieved party after the Grievance Redress Committee has taken a decision regarding his/her complaint. If it is a land-related issue, the Project Coordinator and the GRC will advise the Director General, to engage the Ministry of Land and Local Government.	
4	If the matter remains unresolved, or complainant is not satisfied with the outcome at the project level (GRC), the PCU Project Coordinator GTTI Director General, will then refer the matter to the National Steering Committee (NSC) for a resolution.	7 days
5	If it remains unresolved or the complainant is dissatisfied with the outcome proposed by the NSC, he/she is free to refer the matter to physical planning or the Ministry of Local Government and lands if it is a land matter.	Anytime
6	If it is a land related issue, the GTTI Director General may seek the assistance of the Physical Planning MD and Permanent Secretary of Ministry of Lands and Local Government.	Immediately after stage 3
7	If the issue remains unresolved, then the ultimate step will be for the Courts to deliberate on. Any such decisions are final.	Anytime

7. PROCEDURES FOR MANAGEMENT OF SEA/SH-RELATED COMPLAINTS

Step 1: Uptake (See Intake-Registration Form in Annex E)

The Children's Act protects all the children in The Gambia without discrimination. The best interest of the child should be the primary consideration in any matter that affects or concerns a child. Everyone has a duty to report to either the Police or Department of Social Welfare, any case of child abuse or the violation of the right of any child that he or she knows about. It is against the law to sexually abuse or exploit a child in any form or even encourage it, to keep a brothel or allow a child to be in your brothel (The Children's Act 2005).

A complainant who wishes to lodge a SEA/SH-related grievance may use any trusted channel available to her or him to file a complaint with the project GRM. The project has identified secure, confidential, and accessible entry points through which survivors will feel safe and comfortable making reports (e.g., telephone and toll-free number) service provider, community-based structure or Regional Monitors for SEA/SH cases etc.). Complainants may also use contractor grievance processes to file SEA/SH claims, but once filed with the contractor, the claims will be referred for verification to the project GRM operator (The Social Safeguards Specialist) since they all work together.

A complaint intake form should be completed by the project GRM operator through the various uptake channels listed above after having obtained the survivor's verbal consent to proceed with the grievance (See Annex D). The GRM operator however will still obtain a written consent from the survivor to fill out the complaint intake form and to share information with the appropriate service providers if necessary. If the complainant has not yet been referred for services, the intake actor should confirm whether the survivor wishes to receive support, and if so, obtain the survivor's consent to be referred for appropriate care and connect the survivor with locally available providers or arrange for remote support where needed. Medical, psychosocial, and legal aid services should at least be made available, other services as well if possible (e.g., socio-economic, security and legal). The hard copies of the intake and verification forms will be stored in a safe and secure locker at the MoBSE Head Quarters whilst the soft copies will be stored on the computer of the GRM Operator and locked with a password.

If the survivor chooses to be referred for services only and not to file a complaint, then the survivor's wishes must be respected; the service provider can then ask if the survivor consents to share basic case information in order to assist the project to track the cases that choose not to access the GRM (See Annex D Informed Consent).

The survivor always retains the right to be referred for services whether or not there is a link established between the project and the incident in question.

Where selected, the actors are usually trained on how to receive and refer SEA/SH cases in accordance with survivor care principles, how to apply active listening techniques, and how to escalate complaints to the GRM Operator safely and confidentially as they are illiterates. Any information collected about a survivor or the alleged perpetrator must be recorded and maintained separately from other grievance documentation, in a secure and lockable space, with strictly limited access.

Where a complaint is referred to the national level, the laws and procedures of the Judiciary System of the Gambia will be followed.

The response protocol for addressing SEA/SH claims is in Annex B.

Step 2: Sort and process

Once the complaint has been formally received by the GRM operator, with informed survivor consent, the GRM focal point should verify that the complainant has been offered the opportunity to receive services, and if not, ensure that the survivor is referred for necessary services upon obtaining the survivor's informed consent.

The complaint should then be triaged as a SEA/SH complaint and the coordinator for the verification structure notified that a SEA/SH complaint has been received and will need review. The GRM focal point should also notify the appropriate PCU focal point, who in turn will inform the World Bank project lead, within a 24-hour period that a SEA/SH complaint has been received. The GRM focal point need only share the nature of the case, the age and sex of the complainant (if known), whether there is a link with the project, and whether the survivor has been referred for services. **Absolutely no identifying information for the survivor or the alleged perpetrator may be shared with either the PCU or World Bank focal points.**

Step 3: Acknowledge receipt

The GRM focal point should ensure that the complainant receives a document acknowledging formal receipt of the SEA/SH grievance within three days of the complaint being filed. Delivery of the acknowledgement to the complainant will depend upon how the complaint was initially received; if, ideally through a service provider, then all communication with the survivor can be done through the service provider.

Step 4: Verification process (see Annex F on verification structure)

The verification process for a SEA/SH grievance will be handled by a separate structure established through the GRM operator. The verification structure will be in the form of a committee, with five members, who will be recruited from MoHERST and GTTI. The team would comprise of five members which includes:

1. Representative from Gender Unit (Annex H) at MoBSE
2. GTTI Gender Focal Point
3. The contractors' Gender Focal Point
4. The Social Welfare representative (Service Provider)
5. Construction Monitor.

The first three were selected because they have a background in handling gender-related cases whilst the fourth member represents the welfare of men, women and children. The fifth member frequently visits the Project Community to monitor the progress of the work and escorts visitors on site as he is the MoBSE Construction Monitor for the region. These members will be specially trained on the management and review of SEA/SH complaints, the importance of a survivor-centered approach, as well as guiding principles for survivor care and management of SEA/SH data and claims. If permitted by the survivor, a representative from a service provider should participate in the verification committee in order to provide advocacy on behalf of the survivor and ensure that survivor care principles are respected throughout the process.

Once convened by the coordinator, the verification committee will review available information about the SEA/SH claim in question, the nature of the claim, and whether there is a link with the project. The committee will also make its recommendations to the alleged perpetrator's employer or manager as to appropriate disciplinary sanctions per the code of conduct, type of incident, and the appropriate labor laws and regulations. Potential disciplinary sanctions for alleged perpetrators can include, but are not limited to, informal or formal warnings, loss of salary, and suspension or termination of employment. The committee must complete the verification process and render its decision within ten calendar days of receipt of the complaint.

It should be noted that the objective of the verification process is to examine only whether there is a link between the project and the reported SEA/SH incident and to assure accountability in recommending appropriate disciplinary measures. The verification process establishes neither the innocence nor the guilt of the alleged perpetrator as only the judicial system has that capacity and responsibility. In addition, all final decisions regarding disciplinary actions will rest solely with the employer or manager of the alleged perpetrator; the verification committee can make only its recommendations.

Members of the verification committee are also chosen in accordance with the following principles of:

- 1) Competence in their capacity to perform the committee's work;
- 2) Transparency in the choice of the committee members in accordance with clearly defined criteria;
- 3) Confidentiality of all involved parties, which must be respected by committee members; and
- 4) Impartiality of its chosen members, who can participate and perform their work without conflicts of interest.

Step 5: Monitor and evaluate

Monitoring of the SEA/SH complaints will be important to ensure that all complainants are offered appropriate service referrals, that informed consent is obtained in all cases for both filing of grievances and service referrals, and that all grievances are handled safely and confidentially, and in a timely manner. Any information shared by the GRM operator back to the PCU or World Bank will be limited as noted above under Step 2. The project GRM operator should exchange in a safe and ethical way information with service providers in order to ensure safe and confidential sharing of case data as well as appropriate closures of SEA/SH cases.

Step 6: Feedback to involved parties

Once the verification process has been concluded, the result of the process shall be communicated first to the survivor within 14 calendar days, ideally through the service provider if applicable, in order to allow the survivor and relevant advocates the appropriate amount of time to ensure adequate safety planning as needed. Once the survivor has been informed, the alleged perpetrator can be informed of the result as well.

If either party disagrees with the result, s/he is permitted to appeal the verification committee's decision via the GRM appeals process and must file an appeal within 14 days of receipt of the verification result. This appeal will be filed to the PS (MoHERST) who will set up a committee who will deliberate further on the case.

For management and resolution of cases regarding SEA/SH and VAC, please see the above procedures set forth under Section 7.

ANNEXES FOR THE GRIEVANCE MECHANISM

Annex A: Code of Conduct for Implementing ESHS and OHS Standards Preventing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), and Violence against Children (VAC)

Annex B: Response Protocol for SEA/SH Complaints

Annex C: Grievance Log (for non-SEA/SH complaints)

Annex D: Survivor Consent Form

Annex E: Intake Form

Annex F: SEA/SH complaint verification Form

Annex G: Service Provider mapping

Annex H: Gender Education Unit

Annex A: Code of Conduct

IMPLEMENTING ESHS AND OHS STANDARDS

PREVENTING SEXUAL EXPLOITATION AND ABUSE, SEXUAL HARASSMENT, AND VIOLENCE AGAINST CHILDREN

Individual Code of Conduct

I, _____, acknowledge that adhering to environmental, social health and safety (ESHS) standards, following the project's occupational health and safety (OHS) requirements, and preventing sexual exploitation and abuse (SEA), sexual harassment (SH), and violence against children (VAC) is important.

The Ministry of Higher Education, Research, Science and Technology considers that failure to follow ESHS and OHS standards, or to commit acts of SEA/SH or VAC —be it at the office or the work surroundings—constitute acts of gross misconduct and are therefore grounds for sanctions, penalties, or potential termination of employment. Prosecution by the Police of those who commit SEA/SH or VAC may be pursued if appropriate, and only upon informed survivor consent, or in the case of a minor, with appropriate caregiver consent.

I agree that while working on the project I will:

1. Attend and actively partake in training courses related to ESHS, OHS, HIV/AIDS, SEA/SH and VAC as requested by my employer.
2. Will always wear my personal protective equipment (PPE) when at the work site or engaged in project related activities which require safety precautions.
3. In the case of construction workers, take all practical steps to implement the contractor's environmental and social management plan (C-ESMP).
4. Implement the OHS Management Plan.
5. Adhere to a zero-alcohol policy during work activities, and refrain from the use of narcotics or other substances which can always impair faculties.
6. Consent to Police background check.
7. Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic, or social origin, property, disability, birth or nationality, sexual orientation, gender identity, or other status.
8. Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
9. Not engage in sexual exploitation, which is defined as any actual or attempted abuse of position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another.
10. Not engage in sexual abuse, which is defined as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
11. Not engage in sexual harassment, which is defined as any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or

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

12. 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.
13. 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.
14. Consider reporting through the GRM or to my manager any suspected or actual SEA/SH or VAC by a fellow worker, whether employed by the Ministry or not, or any breaches of this Code of Conduct.

- **With regards to children:**

1. Wherever possible, ensure that another adult is present when working in the proximity of children.
2. Not invite unaccompanied children unrelated to my family into my home unless they are at immediate risk of injury or in physical danger.
3. Not use any computers, mobile phones, video, and digital cameras or any other medium to exploit or harass children or to access child pornography (see also “Use of children's images for work related purposes” below).
4. Refrain from physical punishment or discipline of children.
5. 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.
6. Comply with all relevant local legislation, including labor laws in relation to child labor and World Bank’s safeguard policies on child labor and minimum age.
7. 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:

1. Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.
2. Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.
3. 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.
4. Ensure images are honest representations of the context and the facts.

5. 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 (increase dialogue and awareness training).
4. Loss of up to one week's salary.
5. Suspension of employment (without payment of salary), for a minimum period of one month up to a maximum of six months.
6. Termination of employment.
7. Report to the Police if warranted.
8. Fines (involve crime and serious human rights violations).
9. Suspended while investigations take place (to have clear evidence against the alleged perpetrator).

Reporting mechanism:

If I see and/or witness a case of SEA/SH misconduct as described in this Code of Conduct, or I am a victim of any prohibited behaviors, I can call the toll-free number (XXXX) or contact any SEA/SH focal points among the service providers, community-based structure, Community-based focal points or Regional SEA/SH Monitors. I can always contact the Social Safeguard specialist for guidance and information.

I understand that it is my responsibility to ensure that the environmental, social, health and safety standards are met. That I will adhere to the occupational health and safety management plan. That I will avoid actions or behaviors that could be construed as SEA/SH or VAC. Any such actions will be a breach 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 ESHS, OHS, SEA/SH and VAC issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signature: _____

Printed Name: _____

Title: _____

Date: _____

Witness Name: _____

Signature: _____

Address: _____

Date: _____

Annex B: Response Protocol for SEA/SH Complaints

This annex provides standard operating procedures to follow for service referrals when a complaint related to SEA/SH is received through the project's grievance mechanism. This protocol should be adapted for each project intervention zone as needed to incorporate information about relevant and available local service providers.

Protocol objectives

This protocol outlines the procedures to follow when a case of SEA/SH is reported and identifies the principal response actors that provide survivor support, normally health, psychosocial (which can include social reinsertion), and legal services. This protocol also outlines the roles, responsibilities, and guiding principles regarding SEA/SH response and survivor care.

Key terms and concepts

Aggressor: The person, group, or institution that inflicts directly, or supports by any other means, violence or abuse inflicted on another against his or her will.

Consent: Consent must be informed, based on a clear appreciation, and understanding of the facts, implications, and future consequences of an action. In order to give consent, the individual concerned must have all relevant facts at the time consent is given and be able to evaluate and understand the consequences of an action. The individual also must be aware of and have the power to exercise the right to refuse to engage in an action and/or to not be coerced (i.e., by financial considerations, force, or threats). There are instances where consent might not be possible due to cognitive impairments and/or physical, sensory, or developmental disabilities.

Children are considered unable to provide consent because they do not have the ability and/or experience to anticipate the implications of an action, and they may not understand or be empowered to exercise their right to refuse. The World Bank considers children as anyone under the age of 18—even if national law may have a lower age—and, as such, not able to give free and voluntary consent.¹ Mistaken belief regarding the age of the child and consent from the child is not a defense in SEA of children. Sexual activity with individuals below the age of 18 is therefore considered child sexual abuse, except in cases of pre-existing marriage.²

Gender-based violence (GBV): Umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (i.e., gender) differences between males and females. It includes acts that inflict physical, sexual, or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private.

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

² The age of consent has important implications for workers employed on World Bank-financed projects. If a worker is married to someone under the age of 18 and that marriage is recognized by a public, religious or customary authority and consistent with the legal age for marriage in the country, such underage marriage shall not constitute a reason not to employ the worker. Under any circumstances other than these, Codes of Conduct shall prohibit workers from engaging in sexual intercourse with anyone under the age of 18. If a worker engages in sexual intercourse with anyone under the age of 18 while employed under the project, a range of employment sanctions shall apply, as set out in the Code of Conduct, following a full and fair review.

Sexual exploitation: Any actual or attempted abuse of position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another.

Sexual abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual harassment: Any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile or offensive work environment.

Survivor or victim: An individual who has experienced an incident of GBV, including SEA/SH. The terms “victim” and “survivor” are used interchangeably. The term “victim” is most often used in the medical and legal fields, and the term “survivor” is used more often in the field of psychosocial support to denote internal individual resilience.

Survivor-centered approach: The survivor-centered approach is based on a set of principles and skills designed to guide professionals—regardless of their role—in their engagement with survivors (predominantly women and girls but also men and boys) who have experienced sexual or other forms of violence or abuse. The survivor-centered approach aims to create a supportive environment in which the survivor’s interests are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor’s recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor’s capacity to make decisions about possible interventions.

GBVIMS classifications

The Gender-Based Violence Information Management System (GBVIMS) offers six principal and systematic classifications for GBV, as listed below. Intake forms may use these classifications to identify a particular type of GBV incident. Cases of SEA and SH, apart from rape, would be classified under sexual assault.

Rape: non-consensual penetration (however slight) of the vagina, anus or mouth with a penis or other body part. Also includes penetration of the vagina or anus with an object.

Sexual assault: any form of non-consensual sexual contact that does not result in or include penetration. Examples include attempted rape, as well as unwanted kissing, fondling, or touching of genitalia and buttocks. Female genital mutilation/cutting (FGM/C) is an act of violence that affects sexual organs, and as such, should be classified as sexual assault. This incident type does not include rape, i.e., where penetration has occurred.

Physical assault: an act of physical violence that is not sexual in nature. Examples include hitting, slapping, choking, cutting, shoving, burning, shooting or use of any weapons, acid attacks or any other act that results in pain, discomfort, or injury. This incident type does not include FGM/C.

Forced or child marriage: the marriage of an individual against her or his will.

Denial of resources, opportunities, or services: denial of rightful access to economic resources/assets or livelihood opportunities, education, health, or other social services. Examples include a widow prevented from receiving an inheritance, earnings forcibly taken by an intimate partner or family member, a woman prevented from using contraceptives, a girl prevented from attending school, etc.

Psychological or emotional harm: infliction of mental or emotional pain or injury. Examples include threats of physical or sexual violence, intimidation, humiliation, forced isolation, stalking, verbal harassment, unwanted attention, remarks, gestures, or written words of a sexual and/or menacing nature, destruction of cherished things, etc.

Guiding principles for survivor care

Confidentiality: always Respect the confidentiality of the survivor and his/her family. If the survivor gives her/his informed consent, share only relevant information with others for the purpose of helping the survivor, such as referring for services. Confidentiality and anonymity of the alleged aggressor's identity must also be respected. All identifying personal information (name, address, etc.) must be withheld in the reporting, compilation and sharing of data.

Exceptions to confidentiality occur only when an adult survivor is threatening her or his own life or the life of another person and when the survivor is a child.

Non-discrimination: Any adult or child, regardless of sex, has the right to receive care and support under the same conditions. SEA/SHSEA/SH survivors must receive equal and impartial treatment, regardless of their race, ethnicity, religion, nationality, sexual orientation, or gender identity.

Respect: All actions taken will be guided by respect for the wishes, choices, rights, and dignity of the survivor.

Security: Always ensure the safety of the survivor. Remember that s/he may be frightened and need assurance that s/he is safe. In all types of cases, ensure that s/he is not placed at risk of further harm by the alleged aggressor. If necessary and with survivor informed consent, ask for assistance from police, elders, community leaders or others who can provide security. Maintain awareness of safety and security of people who are helping the survivor, such as family, friends, counselors, and health care workers.

Types of survivor support services

Actors that receive specialized training or have considerable programming experience in relation to service provision for GBV survivors are considered specialized providers, such as for health and psychosocial support services and case managers.

Actors that work in sectors outside of the GBV prevention and response arena are considered non-specialized providers though they may still be actors that offer other support services or additional entry points for orienting survivors towards assistance.

Health: A survivor, especially following an incident of rape, may need medical care to treat injuries or to receive sexual or reproductive health care services, such as prevention of STIs, screening for and prophylactic treatment of HIV/AIDS, emergency contraception, and other common treatments for the physical consequences of GBV. Medical care can also encompass medico legal evidence collection.

Legal assistance: These services offer legal counsel to survivors who wish to report or file a complaint in court against the alleged aggressor. Legal assistance also encompasses proper representation for the survivor before the court system and proper support throughout the legal process. Legal interventions in some project areas can be very limited and weak; therefore, it is important for the survivor to understand all of the advantages and disadvantages of pursuing a legal remedy in order to ensure an informed decision.

Psychosocial: These services aim to offer a response to the harmful emotional, psychosocial, and social effects of GBV. Psychosocial support seeks to improve the survivor's well-being in aiding her/him to heal, re-establishing a normal life, protecting the survivor from an accumulation of troubling events, and encouraging the survivor and her/his family to rebuild their lives and envision a positive future. These services can encompass individual case management as well as group activities that target emotional support and social reintegration.

Security: All service providers must prioritize and reflect upon the safety and security of the survivor and her/his family, as well as that of their provider colleagues offering support. Security services may encompass support from law enforcement or the court system, but this will depend upon the project context and whether these agents have been properly trained and equipped.

Additional survivor support options: For survivors or complainants who are project personnel or workers, and with the survivor's full participation and consent, the project may also be in a position to undertake further survivor support measures to ensure the survivor's safety, such as adapting personnel duties, location, or hours; facilitating safe transportation options; ensuring adequate leave for needed appointments, safe accommodation, or caregiver duties; and adopting other measures to ensure family-friendly or flexible work arrangements.

Procedure for referrals or requests for assistance

❖ Reporting an incident

A survivor has the right to report an incident of SEA/SH to any actor or individual that s/he wishes and whom she trusts, such as a family member, a friend, another member of the community, a service provider, or community or religious leader. A survivor may choose to receive or not to receive support or be referred for services, such as health or psychosocial care. Any actor or individual in whom a survivor confides should give the survivor all possible information about her/his options and available services if the survivor consents. Service providers often provide helpful entry points, but any entry point into the grievance redress system must be accessible, secure, reliable, and confidential.

❖ Referring for services

Service referrals can happen in multiple directions:

- Referrals from individuals or actors who are not specialized GBV service providers;
- Referrals among specialized GBV service providers (e.g., between a medical and psychosocial support provider); and
- Referrals from specialized GBV providers to non-specialized providers, who may offer services in other areas not directly linked to GBV services.

When a non-specialized provider receives a report of SEA/SH, this actor's principal priority is to provide basic emotional support as well as offer information to the survivor as to locally available services for referral, with the survivor's consent. Immediate actions for this individual would be to:

❖ Offer active listening;

Provide basic information about locally available services;

Ask for the survivor's informed consent for referral; and

❖ **Refer to other services in a timely manner.**

The non-specialized actor should ensure that the suggested service provider can in fact provide assistance to the survivor, and once the survivor is referred for other services, the direct assistance from the non-specialized provider ends there.

Specialized providers that receive a report of SEA/SH must provide care to the survivor in accordance with international best practices and guiding principles for survivor care.³ Holistic support from specialized providers includes case management, medical care, psychosocial support and mental health interventions, security options, and legal assistance. These actors must likewise be active listeners and provide all information about a survivor's available options, obtaining the survivor's informed consent first before proceeding. Specialized providers should also provide survivors, and/or their caregivers where needed, information about any mandatory reporting laws, if relevant in a particular context, before proceeding.

³ See Clinical Management of Rape (World Health Organization, 2009); Caring for Child Survivors of Sexual Abuse: Guidelines for health and psychosocial service providers in humanitarian settings (UNICEF and IRC, 2012); Interagency Gender-Based Violence Case Management Guidelines (IASC, 2017); and Minimum Standards for Prevention and Response to Gender-Based Violence in Emergencies (UNFPA, 2015).

Annex D: Survivor Consent Form

Consent form: Both non-specialized and specialized actors must obtain informed consent from the survivor before proceeding with service referrals or information. Ideally, the survivor should read and sign a document that gives her or his consent to be referred for or to proceed with services as well as regarding sharing of limited case information. If the survivor is unable to read or write, the individual or provider can read the consent form aloud and the survivor can use a thumbprint to sign the document. Any such documentation must be maintained separately in a secure and locked area with strictly limited access.

Survivor Consent Form

We invite you to be interviewed about a case reported to our office concerning you. We assured you that strict confidentiality is essential and MUST be maintained at all times, except when you as the (survivor) or the (caseworker) faces imminent risk to your well-being, safety and security. You are also assured that your anonymity would be maintained wherever possible. All written information about you the (survivor) would be kept locked and secure from others. Safety and Security at all times, your safety as a survivor must remain paramount into our work.

For confidentiality, your answers will not be associated with your name. Rather, you will be given an identification number on the interviewer's sheet. We will make sure all risk associated to your safety is eliminated or minimized at all costs. You may opt to answer questions that you wish to answer. If you have any concerns or you are dissatisfied with any aspect of this interview you may report the grievances anonymously if desired to the Grievance Mechanism Committee.

If you think you are not comfortable with the location where the interview is proposed to be conducted, please you are free to ask for change of location as we want to ensure that you the (survivor) is not placed at risk of further harm by the aggressor, in all cases.

Freedom to Withdraw or Refuse Participation: I understand I have the right to stop the interview at any time, or to refuse to answer any of the interviewer's questions without prejudice from the interviewer.

Please feel free to ask the interviewer any questions before signing the consent form or at any time during or after the interview.

I understand that in giving my authorization below, I am giving (*Social safeguard Focal Point*) permission to share the specific case information from my incident report for the only purpose of accessing the GRM

I understand that shared information will be treated with confidentiality and respect and shared only as needed to provide the service I request. I understand that releasing this information means that a person from the verification committee may come to talk to me.

At any point, I have the right to change my mind about sharing information with the designated agency/focal point listed below.

Name: _____

Date: _____

Tel: _____

Signature _____

Signature of parent or guardian if the survivor is below 18:

Furthermore, I understand that in giving my authorization below, I am giving (*Social Safeguard Focal Point*) permission to share the specific case information from my incident report with the service provider(s) I have indicated, so that I can receive help with safety, health, psychosocial, and/or legal needs.

Name: _____

Date: _____

Tel: _____

Signature _____

Signature of parent or guardian if the survivor is below 18:

Intake Forms

Intake form: Specialized service providers that receive a case must fill out an intake form after obtaining survivor consent, which will assign an anonymous code to the survivor. During the interview, the provider should inform the survivor of the type of help that the provider can offer, including the advantages and disadvantages of receiving different services. Any intake and other case documentation must also be maintained separately in a secure and locked area with strictly limited access.

Annex E: Intake Form

SURVIVOR
CODE

STANDARD GBV INTAKE-REGISTRATION FORM

INSTRUCTIONS
 1- This form must be filled out by the person providing services to the survivor
 2- Remind the that all information will be kept confidential, and that they may choose not to answer any of the following questions.

Report Date*	Incident Date*	Staff Code (if available)	Report by Survivor*? <input type="checkbox"/> Yes <input type="checkbox"/> No
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Survivor Information			
Survivor's Age*	Sex of survivor* <input type="checkbox"/> Female <input type="checkbox"/> Male	Specific Needs / Vulnerabilities* (check <u>all</u> that apply) <input type="checkbox"/> No <input type="checkbox"/> Physical Disability <input type="checkbox"/> Mental Disability <input type="checkbox"/> Unaccompanied Minor <input type="checkbox"/> Separated Child <input type="checkbox"/> Other Vulnerable Child	

Details of the Incident		
Area*^o	Sub-Area*^o	Village / Town

<p>Type of incident/violence* (Please select <u>only ONE</u> of the below. Refer to the GBVIMS GBV Classification Tool for further clarification.)</p> <p><input type="checkbox"/> Rape (includes gang rape, marital rape)</p> <p><input type="checkbox"/> Sexual Assault (includes attempted rape and all sexual violence/abuse without penetration, and female genital mutilation)</p> <p><input type="checkbox"/> Physical Assault (includes hitting, slapping, kicking, shoving, etc. that are not sexual in nature)</p> <p><input type="checkbox"/> Forced Marriage (includes early marriage)</p> <p><input type="checkbox"/> Denial of resources, opportunities or services (includes denial of inheritance, earnings, access to school or contraceptives, etc. Reports of general poverty should not be recorded.)</p> <p><input type="checkbox"/> Psychological / Emotional Abuse (includes: threats of physical or sexual violence, forced isolation, harassment /intimidation, gestures or written words of a sexual/menacing nature, etc.)</p> <p><input type="checkbox"/> Non-GBV (specify) _____</p>	<ol style="list-style-type: none"> Did the reported incident involve penetration? If yes → classify the incident as "<u>Rape</u>". If no → proceed to the next incident type on the list. Did the reported incident involve unwanted sexual contact? If yes → classify the incident as "<u>Sexual Assault</u>". If no → proceed to the next incident type on the list. Did the reported incident involve physical assault? If yes → classify the incident as "<u>Physical Assault</u>". If no → proceed to the next incident type on the list. Was the incident an act of forced marriage? If yes → classify the incident as "<u>Forced Marriage</u>". If no → proceed to the next incident type on the list. Did the reported incident involve the denial of resources, opportunities or services? If yes → classify the incident as "<u>Denial of Resources, Opportunities or Services</u>". If no → proceed to the next incident type on the list. Did the reported incident involve psychological/emotional abuse? If yes → classify the incident as "<u>Psychological / Emotional Abuse</u>". If no → proceed to the next incident type on the list. Is the reported incident a case of GBV? If yes → Start over at number 1 and try again to reclassify the incident (<i>If you have tried to classify the incident multiple times, ask your supervisor to help you classify this incident</i>). If no → classify the incident as "<u>Non-GBV</u>".
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Were money, goods, benefits, and / or services exchanged in relation to this incident*?	<input type="checkbox"/> No <input type="checkbox"/> Yes
Has the survivor reported this incident anywhere else*? (If yes, select the type of service provider and write the name of the provider where the client reported). <input type="checkbox"/> No <input type="checkbox"/> Yes (specify) :	

Alleged Perpetrator Information		
Number of alleged perpetrator(s)* <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> More than 3	Alleged perpetrator sex* <input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Both	Main occupation of alleged perpetrator (if known) <input type="checkbox"/> Farmer <input type="checkbox"/> Police <input type="checkbox"/> Soldier <input type="checkbox"/> Security Official <input type="checkbox"/> Teacher <input type="checkbox"/> Parent <input type="checkbox"/> NGO Staff <input type="checkbox"/> Religious / Community Leader <input type="checkbox"/> Other / Unknown <input type="checkbox"/> Unemployed <input type="checkbox"/> Any other individual associated with the project
	Age* <input type="checkbox"/> Adult <input type="checkbox"/> Minor <input type="checkbox"/> Adult & Minor	

Annex F: SEA/SH complaint verification Form

Introduction:

This form should guide the verification process by the verification structure/committee. The verification structure will be in the form of a committee, with five members, recruited from MoBSE. If permitted by the survivor, a representative from a service provider should participate in the verification committee in order to provide advocacy on behalf of the survivor and ensure that survivor care principles are respected throughout the process.

The verification committee is tasked to review available information about the SEA/SH claim in question, the nature of the claim, and whether there is a link with the project. The committee will also make its recommendations to the alleged perpetrator's employer or manager as to appropriate disciplinary sanctions.

It should be noted that the objective of the verification process is to examine only whether there is a link between the project and the reported SEA/SH incident and to assure accountability in recommending appropriate disciplinary measures. The verification process establishes neither the innocence nor the guilt of the alleged perpetrator as only the judicial system has that capacity and responsibility. In addition, all final decisions regarding disciplinary actions will rest solely with the employer or manager of the alleged perpetrator; the verification committee can make only its recommendations.

Section A:

Has the survivor provided his/her informed consent to access the grievance mechanism?

Yes No

IF YES, please complete the form in its entirety.

IF NO, please seek the consent of the survivor only to anonymously share 1) the survivor code, 2) the type of incident reported and the date and area of the incident, 3) the alleged perpetrator's connection to the project (if known), and 4) the age and gender of the survivor.

Explain that this information will only be used by the project for the purpose of gathering information on the risks created by the project to the safety and well-being of women and girls in their communities and to take steps to mitigate these risks. No data specific to the incident in question, including the identity of the victim, specific location, etc., will be shared outside the provider.

Has the survivor provided his/her informed consent to share the abovementioned information?

Yes No

IF YES, please fill out below only Section B.2; B.2; B.3

IF NO, please do not fill out the rest of the form.

Section B:

1. INFORMATION RELATED TO THE GRIEVANCE RAISER/GBV SURVIVOR

Survivor Code:

Age and sex of the GBV survivor:

Girl (<18)

Woman (>=18)

Boy (<18)

Man (>=18)

2. INFORMATION RELATED TO THE SEA/SH ALLEGATION:

Time, area and date of incident reported by the survivor:

GBV Type (classification GBVIMS):

Rape

Sexual aggression

If relevant, please specify:

Sexual exploitation and abuse

Sexual harassment

Physical aggression

Emotional and psychological violence

Forced marriage

Denial of resources and opportunities

Has the survivor received any services? Yes No

If yes, please specify:

Medical

Psychosocial

Legal

Security/protection:

Other please specify:

3. INFORMATION REGARDING THE LINK TO THE PROJECT:

This session aims to determine whether the incident is linked to the project and if the alleged perpetrator is hired or is associated to the project

Is the alleged perpetrator linked to the project?

Yes

Non

Do not know

Name of the alleged perpetrator (if known):

Role of the alleged perpetrator (if known):

- Farmer
- Teacher
- NGO staff
- Parent
- Police
- Soldier
- Security official
- Religious/community leader
- Any other individual associated with the project
- Not known

Has the incident been confirmed as credible after verification?

Yes No Verification ongoing

End date of the verification process:

Decision taken:

- No action/sanction
- Informal warning
- Formal warning
- Additional training
- Loss of salary
- Suspension of employment
- Layoff with notice
- Layoff without notice
- Report to the police if warranted
- Fines
- Other actions

Please specify:

Date of notification to the perpetrator's employer/contractor:

Date of notification to the GBV survivor:

Notification of the implementation of the decisions/sanctions: yes No

Notification to the MOBSE PCU yes No

Notification to the World bank (*the verification structure needs only share the nature of the case, the age and sex of the complainant -if known-, whether there is a link with the project, and whether the survivor has been referred for services*)

yes No

Note below any follow-up communication with the survivor:

For example: When/if a verification has begun, or the allegation has been determined to have an insufficient basis to continue. It may also include concerns raised by the victim through the verification process.

Annex G: Service Provider mapping

LIST OF SOCIAL WORKERS in the Affected REGIONS WITH THEIR CONTACTS

DEPARTMENT OF SOCIAL WELFARE

No.	NAME	INSTITUTION	REGION	CONTACT	Hours of service
1.	Isatou Bah	DSW (Department of Social Welfare)	Greater Banjul and KM (Kanifing Municipality – Region One)	7153177	
2.	Haruna Badjie	DSW (Department of Social Welfare)	West Coast Region – Region Two	3756247	

LIST OF NGBV (Network against Gender Based Violence) ONE STOP CENTRES FOCAL PERSONS PER REGION WITH THEIR CONTACTS

NO	NAME	INSTITUTION	REGION	CONTACT	Hours of service
1.	Mamadou Jallow	EFSTH (Edward Francis Small Teaching Hospital)	Banjul Region One	3706720	
2.	Dr. Babanding Daffeh	Serekunda General Hospital	KM (Kanifing Municipality – Region One)	2744775	
3.	Aisha Minteh/Dr. Stephanie	Bundung	KM (Kanifing Municipality – Region One)	3953558/3233013	
4.	Fatimah Jaiteh	Brikama	WCR (West Coast Region) Region Two	7738138	

LIST OF POLICE COMMISSIONERS IN AFFECTED REGIONS WITH THEIR CONTACTS.

No.	Name	Institution	Region	Contact	Hours of service
1.	Commissioner of Police Alhagi Kinteh	Police Medic	Banjul – Region One	3912113/991 2113	
2.	Commissioner of Police Lala Camara	Banjul Headquarter	Banjul – Region One	9988168	
3.	Commissioner of Police Adlime Basangeh	PIU (Police Intervention Unit)	KM (Kanifing Municipality – Region One)	2508276/996 3032	
4.	Commissioner of Police Amadou Sabally	Kairaba Station	KM (Kanifing Municipality – Region One)	3950922	
5.	Commissioner of Police Famara Jallow	Brikama	WCR (West Coast Region) Region Two	9966077/214 5231	

NB: For Police Headquarter in Banjul, the Gender and child welfare officers are under the purview of the Assistant Inspector General of Police (AIG) Demba Sowe. Tel: 7763010.

What to do when services are not available: If complete services are not available in a particular intervention zone, the survivor should still be informed of what services are or are not available and how remote support might be offered if that is an option. It is important that a survivor’s expectations in relation to service availability be managed realistically.

Working with child survivors: In cases involving minors, actors specialized in child protection should be involved and integrated into the referral pathway. Children have the right to be consulted directly about their case as well as to receive all available information that is necessary to help them decide upon a particular course of action, in accordance with their age and stage of maturity and cognitive development. Wherever appropriate, parents or caregivers should also be involved in the case management process, and children have the right to let a service provider know the adult in whom the child places the most trust and confidence. If the alleged aggressor is a member of the family, it is extremely important that any interview with the child take place outside of the family unit and in the presence of an adult whom the child trusts. A child’s capacity to provide consent with regard to services or information-sharing will depend upon the child’s age, level of maturity, and ability to express him or herself freely; the best interest of the child should also be taken into account.

Everyone has a duty to report to either the Police or Department of Social Welfare, any case of child abuse or the violation of the right of any Child that he or she knows about. It is against the law to sexually abuse or exploit a Child in any form or even encourage it, to keep a brothel or allow a child to be in your brothel, (The children’s Act 2005). For the benefit of the USET project, there are SEA/SH Focal Points would be identified within project sites who will work directly with the MoBSE Safeguard Team and GTTI Safeguards Focal Points. In addition, they would be train on how to handle and report SEA/SH cases especially when it involves a child survivor. All referrals are done by using the numbers of contacts indicated in the GM

referral pathways and that of the GRM Operator's number (for the most up-to-date information, please consult the Safeguard Team at MoBSE, PCU).

Payment for survivor services: The GM operator will arrange for payment of survivor support costs for project-related claims that are not otherwise covered through public services, such as government health or social service centers, including transport costs to ensure access to needed services. In order to facilitate this coverage, the project may need to enter into partnership arrangements with certain service providers for the life of the project.

Information and data management: With regards to management of SEA/SH-related data, all documentation related to any SEA/SH case must be filed and maintained separately, in a lockable space, with access that is strictly limited. All guiding principles regarding confidentiality and the secure and ethical collection of data must be respected, and any identifying information about a survivor or the alleged aggressor must never be included in any reports regarding SEA/SH cases for the project. Any project personnel responsible for collecting data related to SEA/SH cases must be trained on proper data collection methods and relevant guiding principles, especially surrounding survivor confidentiality and safety.

The project may need to enter into information-sharing agreements with certain service providers in order to ensure the ethical and confidential reporting and sharing of case data. Generally speaking, any data-sharing should be limited to information regarding the nature of the incident, whether the alleged aggressor is linked to the project, the age and sex of the survivor (if known), and whether the survivor was referred for services, and only with the informed consent of the survivor.

Community Sensitization

Information regarding the management procedures for SEA/SH claims and available services must be disseminated regularly within project-affected communities (service-mapping information must therefore be available prior to organizing community awareness-raising sessions or consultations). Community members should be informed about the following:

Entry points to seek help safely and confidentially, whether for services and/or to file a complaint;

Available services in the community and how to access them;

What to expect from service providers, including counter-referrals, as well as the roles and responsibilities of different actors; and

The existence of any mandatory reporting laws, especially in the case of SEA/SH or VAC, so that any survivors or their caregivers are aware of these regulations before deciding whether to seek support from a service provider that may be required to report.

Annex H: The Gender Education Unit

The Gambia's ultimate educational goal is to provide free compulsory universal basic education for all children including both boys and girls in a conducive learning environment. Within the Education Policy framework (Education Policy 2016-2030), the Ministry of Basic and Secondary Education regards gender equity in education as a key priority for achieving the Sustainable Development Goals (SDGs). The commitment of Government to make girls' education a priority has been demonstrated by the establishment of the Girls' Education Unit (GEU) in 1996 within the Basic Education Directorate of the Ministry of Basic and Secondary Education, in order to give new emphasis to the removal of barriers to girls' education in the country and mainstream gender throughout the education process. Moreover, female teachers' welfare is also of paramount importance to the Ministry. The Gender Education Unit has been working assiduously towards achieving these targets with the support of Development Partners and other stakeholders in education such as the non-governmental organizations. With so many girls now in school and the issue of boys' education coming up, the Ministry renamed the Girls' Education Unit, Gender Education Unit in 2004 to cater for both boys and girls.

Mandate of the Unit

- To work on priority areas for future action that are constraining progress towards equality and empowerment of girls particularly in secondary and tertiary institutions
- To raise educational standards and quality in both pre-primary, primary, secondary and tertiary institutions
- To address cultural and social constraints to gender for example, exclusion, gender-based violence and conflict in and outside the school for both students and teachers.
- To promote STEM at basic education level.
- To promote post-secondary education for girls especial in mathematics and sciences and Technical and vocational skill training.
- To focus attention on gender inequality by means of advocacy and better impact evaluation research
- To improve the quality of teaching and learning outcomes at all levels by promoting gender responsive pedagogy
- Provide a conducive learning environment and address school-based violence such as corporal punishment and sexual harassment and abuse and the spread of HIV/aids and the setting up of Guidance and Counselling Centers in all schools in the Gambia.
- To focus on disadvantaged, vulnerable and excluded groups especially the children with special needs, illiterate women especially mothers and out of school youth by providing them with livelihood skills

- To focus on the madrassah by providing the Moudirs and Oustasses with skills in dealing with psychosocial issues of children/students especially girls
- Make referrals as and when necessary to the specialized agencies.

SCOPE

The focus and scope of the current Education Policy (2016-2030) and Strategic Plan (2016-2030) regarding gender and education focuses on access to quality education for all with particular reference to gender mainstreaming and inclusion of all children residing in the Gambia. In this regard no community will be excluded. The activities will include trainings, sensitizations together with regular monitoring to ensure efficiency and effectiveness. Moreover, activities are focused in all the regions and at all levels of schools and communities.