



REPUBLIC OF THE GAMBIA

**The Gambia Inclusive and Resilient Agricultural Value Chain Development Project
(GIRAV)**

Updated Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH) Action Plan

MARCH 2024

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1. INTRODUCTION AND CONTEXT

1.1. Background

¹Gender-based violence (GBV) is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (i.e., gender) differences between males and females. It includes acts that inflict physical, sexual, or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or private spaces (IASC 2015). Globally, women and girls are disproportionately affected by GBV (World Bank 2020). According to the United Nations Declaration on the Elimination of Violence against Women, GBV against women is a manifestation of unequal power relations between men and women, which have led to domination over and discrimination against women by men and the prevention of the full advancement of women (United Nations, 1993).

²Sexual exploitation and abuse (SEA) refer to 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 person. In terms of World Bank-supported projects, sexual exploitation and abuse occur against a beneficiary or member of the community. Sexual harassment (SH) occurs between personnel/ staff and involves any unwelcome sexual advances or unwanted verbal or physical conduct of a sexual nature. SEA/SH is, therefore, a subset of GBV and represents the primary focus of the grievance mechanisms (World Bank 2020).

The Gambia has laws against SEA and GBV. Some of these laws are quite progressive: the Sexual Offences Act 2013, the Domestic Violence Act 2013, the Women Act 2010 and the Children's Act 2005, among others. They provide clear provisions prohibiting among other things acts of violence and abuse against women, girls, and children in general, in any form and protecting victims of the said acts.

The Criminal Code provides for traditional offenses relating to sexual violence against women, such as rape. According to section 122, the maximum punishment for rape is life imprisonment, and the maximum punishment for attempted rape is 7 years. The Sexual Offences Act criminalizes every form of sexual Assault, exploitation, and harassment. This legislation amends the law and procedure relating to the trial of rape and other sexual offenses. The Act addresses some of the barriers that have impeded the trial of rape and other sexual offenses in the past. This Act expands the definition of sexual Assault and other coercive acts to include circumstances where the survivor is coerced into the sexual acts and incorporates perpetrators who would have escaped punishment prior to the amendments of this legislation.

In light of the above, the project will ensure adequate systems are put in place to prevent acts of Gender-Based Violence/Sexual Exploitation and Abuse/Sexual Harassment exacerbated/created by the project. This will be done by establishing and implementing the SEA/SH prevention and response action plan as part of the ESMF.

³The Gambia Country Gender Profile, 2011 shows an important feature of poverty in The Gambia is the gender inequality dimension as women constitute the majority of the poor and extremely poor, exacerbated by the fact that they occupy a low socio-economic status. Agriculture is the main resource base of Gambian women. It provides them a livelihood as the primary food producers, particularly in rice production and horticulture. They often operate at low productivity levels due to limited access to agricultural inputs, credit

¹ World Bank (2020) Grievance mechanisms for Sexual Exploitation and Abuse & Sexual Harassment in World Bank-financed Projects

² World Bank (2020) Grievance mechanisms for Sexual Exploitation and Abuse & Sexual Harassment in World Bank-financed Projects

³AfDB (2011) The Gambia : Country Gender Profile

facilities and technology and lack of market links. The project will serve as a strategic entry point to address women producers' needs in ensuring a gender-responsive extension service, better-organized marketing channels and more equitable participation in value chains.

Given women and girls' limited decision-making powers coupled with poverty and the current COVID-19 pandemic, these are all likely to be exacerbated to heighten vulnerability to GBV in the communities. With the possible deployment of external personnel, including agricultural extension workers, contracted workers, and other experts in the project areas, communities may be exposed to increased risks of sexual exploitation and abuse (SEA) by project workers. Moreover, GBV could result from internal community conflict and/or sexual exploitation of community members who are extorted for sexual favors regarding project beneficial support.

Thus, in accordance with the requirements in the WB SEA/SH Good Practice Note for the GIRAV Project, the SEA/SH action plan is prepared outlining the operational measures that will be put in place to prevent and respond to project-related GBV, including managing related grievances. It incorporates codes of conduct for project sub-contractors and staff and other strategies to prevent risks of GBV from occurring and establishes procedures for managing related grievances. The project should allocate an appropriate budget to implement the SEA/SH action plan and assign the project social safeguard specialist to serve as a SEA/SH GBV main focal person to oversee the implementation of activities.

1.2. Description of the Project

1.2.1. Project Development Objectives (PDO)

The development objective for GIRAV is to promote the development of inclusive and competitive agriculture value chains, focusing on smallholder farmers and agribusinesses in project-targeted areas. To achieve this objective, the project will consist of three interlinked technical components, in addition to the Project Implementation and Coordination Component and emergency response, organized to address the key binding constraints for the development of the agriculture and agribusiness sector:

- i) Increase in the value of marketed output at the beneficiary level (disaggregated by gender, smallholders, and Small and Medium Enterprises -SMEs);
- ii) Increase in productivity of targeted agricultural commodities (yield in metric ton/hectare);
- iii) share of agricultural produce that is processed into higher-value products (percentage); and
- iv) Farmers reached with agricultural assets or services (core indicator- gender-disaggregated).
- v) Improve access to fertilizer to farmers;
- vi) Increase access to potable water supply in rural and peri-urban areas and
- vii) Improve securing access to land, especially for women horticultural producers.

1.2.2. Project Location

The project will be implemented in the 5 administrative regions of the country.

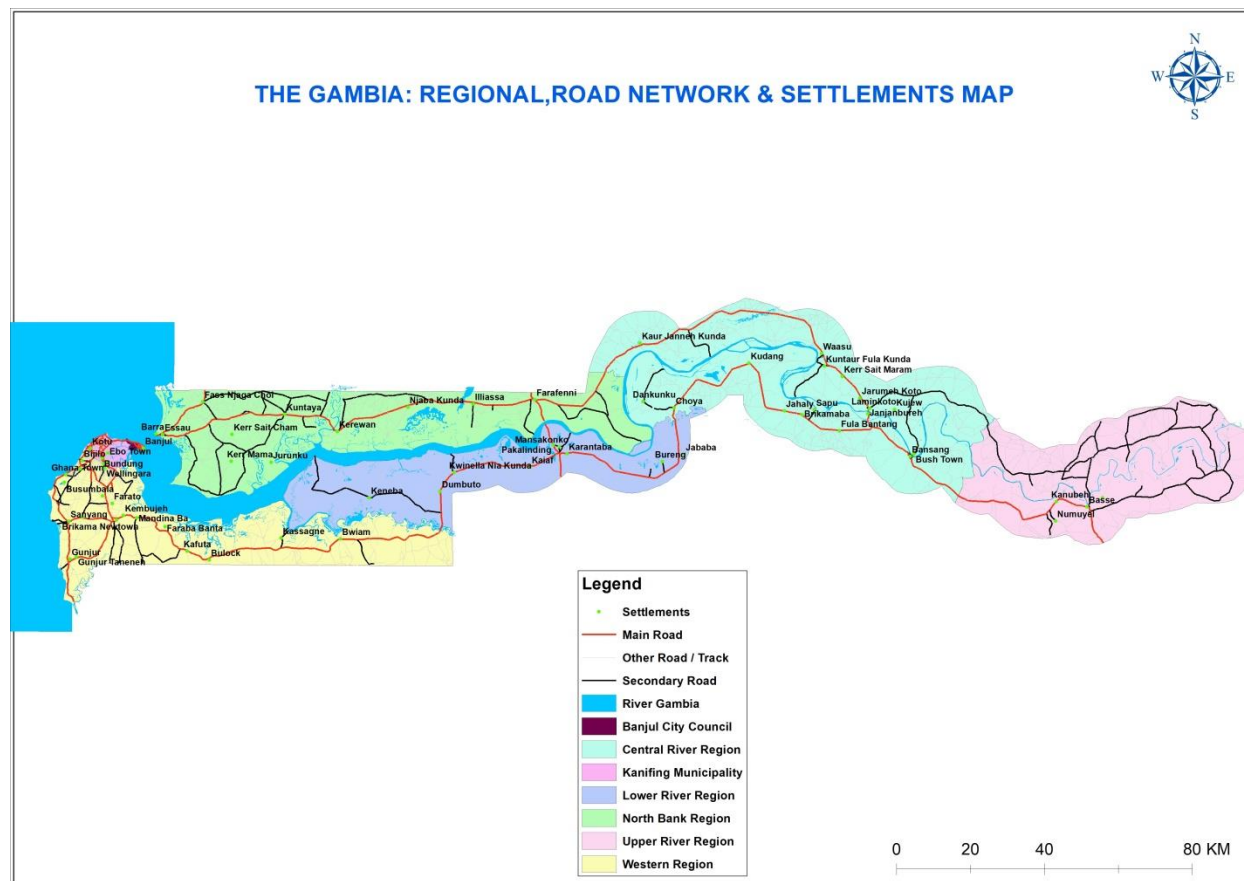


Figure 1. Map of The Gambia

1.2.3. Project components

There are five key proposed project components as describe below:

Component 1. Improving the business environment for commercial agriculture development

The objective of Component 1 is to support the establishment of an enabling environment that can foster private investment and build a competitive and sustainable development of a commercial agriculture/agribusiness sector in the Gambia. This will be achieved by (i) strengthening the capacity of the key organizations engaged in agri-food value chains, improving value chain coordination and partnership between actors, (ii) improving producers' market access by providing (a) key marketing infrastructure, (b) critical SPS services and (c) feeder roads to improve rural mobility and connectivity.

Component 2: Building a productive and climate-resilient agri-food system

This component aims to increase agricultural productivity through climate-smart intensification of selected production systems focusing on enhancing water management and fostering access to improved technologies and innovations.

Component 3: Mobilizing productive private investments along the value chains

This Component will support private investments in productive activities and related services by addressing the major market failures that constrain the financing of investments in agricultural value chains. It will (i) develop the capacity of financial institutions (PFIs) to scale up their financing of agri-food value chain actors by building their knowledge of the sector and their capacity to evaluate agricultural investment proposals; (ii) establish a matching grant (MG) instrument to co-finance competitively selected private productive investments; and (iii) provide technical assistance and capacity building to strengthen technical, entrepreneurial, and management skills of smallholders and SMEs.

Component 4: Project coordination, monitoring and knowledge management

This component aims to ensure that the project is efficiently managed and monitored and that the CPCU and the implementing agencies carefully track that performance and outcomes. It will facilitate (i) administrative, technical, and financial management of the project; (ii) coordination among all institutional partners to ensure efficient flow of information and support to all value chain actors; (iii) effective contractual arrangements with key implementing partners and other private sector operators; (iv) monitoring and evaluation of the performance and the financial, environmental, and social impact of the project; and (v) development of communication activities to publicize and disseminate the project results, best practices and success stories. Under this component, the project will finance: (i) expenses incurred in implementing the project through the CPCU, the participating implementing agencies, and various service providers; (ii) technical assistance provided through consultancies, audits, and training to enhance the implementation capacity of the CPCU; (iii) communication, knowledge production and sharing, and outreach activities; (iv) monitoring and evaluation of project financial performance, outcomes and impacts; (v) citizen engagement; (vi) oversight of social and environmental safeguard policies; and (vii) institutional strengthening to ensure the sustainability of the project's results. e CPCU will implement this component.

Component 5: Contingency Emergency Response

Given The Gambia's vulnerability to shocks, a Contingency Emergency Response subcomponent (CERC), with a zero-dollar provision, is included to create a financing mechanism within the project for emergency demands arising from natural disasters, disease, and other shocks. This CERC is particularly critical in the COVID-19 pandemic as the trend could not be predicted even if the situation is currently manageable. Added to it is the desert locust evasion threatening the West Africa region. If such a crisis develops, the government may request the World Bank to reallocate project funds to cover some costs of emergency response and recovery. The operations manual for the CERC component is being prepared and will be validated prior to any disbursement under this component. All expenditures under this CERC will be in accordance with paragraphs 11, 12, and 13 of World Bank OP10.00 (Investment Project Financing).

Component 6: Improving Access to Water

This component aimed at further increase water supply for agricultural sector to promote irrigation, boost agribusiness, and improve access to potable water in rural and peri-urban areas. It includes 3 sub-components as follows:

Sub-component 6.1: *Expansion of Water Supply to Rural Areas*

The objective of this sub-component is to improve access to water supply in rural and peri-urban areas. The Bank funded GERMP AF provided support to NAWEC and focus on GBA. The rural areas covered by NAWEC have urgent water needs since access to water is extremely limited. Interventions to be funded would involve: (i) drilling new boreholes, construction of pump headworks and solar energy connections, (ii) extension of water distribution networks including construction of tanks and centralized treatment centers where necessary and (iii) new household connections.

Sub-component 6.2: *Meter Replacement, Energy Efficiency Improvements, and Non-Revenue Water (NRW) Improvement*

This subcomponent addresses four principal areas:

- I. *Meter Replacement Program***
- II. *Improvement of Non-Revenue Water (NRW)***
- III. *Energy efficiency improvements of the water business***
- IV. *Technical Studies for Water Supply Masterplan and Groundwater Monitoring***

Sub-component 6.3: *Provision of Water for Irrigation*

This sub-component's objective is to further support the development of irrigation services. It will finance: (i) consultant services for the mapping of groundwater resources in terms of availability and quality; (ii) the technical assistance for an updated assessment of the actual irrigated land areas and the potential of

irrigable land; (iii) infrastructure and equipment to connect boreholes with horticultural perimeters for irrigation; and (iv) associated training to increase water use efficiency and sustainability of infrastructure and equipment.

2. PRINCIPLES OF THE SEA/SH PREVENTION AND RESPONSE PLAN

This plan aims to address Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) Risks in the GIRAV project.

The World Bank Group recognizes that World Bank-financed Projects can potentially increase the risk of GBV in different settings and ways. Based on the protocol set out in the WB SEA/SH Good Practice Note, it is a requirement to conduct a GBV risk assessment for the proposed The Gambia Inclusive and Resilient Agricultural Value Chain Development Project (GIRAV) as there are possibilities of GBV risks increasing as a result of both contextual and project-related factors. Based on the assessment and consultation, the level of risks can be rated as “moderate.” The Risk Assessment highlighted the following as the major risk factors:

- Implementation of policies and enforcement of laws is always a major challenge. Resource allocation to GBV activities and programs is sometimes limited. Gender statistics remain a key challenge to evidence-based, gender-responsive policymaking and programming.
- Presence of gender inequality in secondary, tertiary, and vocational training institutions, where men make up 71% of all enrolments. Women’s literacy levels are incredibly low at 40% (64% for men) and they are a barrier to women’s economic and social empowerment.
- The project can bring an influx of labour and employment income differentials in local communities where the project sites are located. Projects with minor labour influx of workers may increase the demand for sex work, including the risk for trafficking of women for the purposes of sex work or the risk of forced early marriage for girls. Furthermore, higher wages for workers in a community can lead to an increase in transactional sex. The risk of incidents of sex between workers and minors, even when it is not transactional, can also increase. Risk of SEA/SH by project personnel e.g., regional officials who may ask for sexual favors from women and girls for them to be included in the project economic supported activities for farmers, women groups, and other beneficiary groups or receive cash for compensation. Also, the project support can create a backlash and unintentionally heighten the risk of GBV amongst female participants especially given the existing high gender inequality and norms that do not promote women’s economic independence. Rates of household violence can increase when a partner or family members feel threatened by or resentful of a woman’s economic independence.
- Women farmers’ productivity is limited due to a lack of access to inputs such as fertilizer, improved technologies, and capital. Lack of ownership over assets such as land severely curtailed their access to credit. Other constraints were the lack of storage facilities and the long distance they had to travel to reach markets to sell their produce. The project sites may be near routes or roads that are frequently traversed by local women and girls increasing exposure to project workers and in turn, risks of sexual exploitation and abuse (SEA).
- Consultations with key stakeholders on gender matters, including GBV risks and processes, including women’s groups, farmer groups and other stakeholders, need to be placed as part of the project’s ongoing process, community engagement and integration of local concerns and considerations. The vulnerability of girls and young women is related to early marriages, transactional sex, and, in some cases, rape and sexual coercion. In all these situations, women and girls have little or no ability to avoid sex or negotiate safer means. Girls are particularly not empowered to seek and receive health care, including HIV and Hepatitis testing and treatment.
- It is likely that female employees will collaborate with male workers without adequate supervision at work sites; without separate latrines and other sanitation facilities for males and females; and without specific mechanisms for females to share concerns about their working environments, including concerns about sexual harassment.

- The response to GBV is inadequate and uncoordinated. The government runs one shelter which caters to all persons in need of safety, and it is inadequate to cater to the needs of women threatened in their homes. The country also lacks a referral protocol; most cases are dealt with informally instead. Specialized service providers are also lacking; no government agency is coordinating responses. Police officers are also not equipped to deliver adequate responses to victims of GBV. Advocacy programs run by government and NGOs also lack coordination as do the many pieces of research that various actors have conducted. In addition, although there is a GBV network, it focuses on humanitarian issues, and because the project is not applied in a humanitarian environment, frameworks for coordinating GBV prevention and response may be limited and insufficient for the regional level, NGO, and CBO. Several CSOs also provide temporary shelters for GBV survivors.
- This a strength in the Gambia: The Gambia is one of the first countries on the continent to have adopted comprehensive legislation to domesticate the Convention on the Elimination of all Forms of Discrimination against Women (CEDAW) and the African Protocols on the Rights of Women in Africa (APRWA) through the enactment of the Women's Act in 2010

3. SEA/SH PREVENTION AND RESPONSE PLAN

The main goal this plan is to propose appropriated GBV Risk Mitigation, to prevent and produce adequate response to SEA/SH for GIRAV project.

3.1. Key measures

As part of the Bank's initiative to integrate GBV in **The Gambia Inclusive and Resilient Agricultural Value Chain Development Project (GIRAV)**, GBV risk mitigation measures should be planned. Key elements of the plan include:

- Create awareness of PSEA/SH mitigation and response mechanisms within the implementing agency (IA) and contractors.
- Monitor GBV Risks and ensure it is adequately addressed in safeguard instruments.
- Updating ESMPs and C-ESMPs to include the SEA/SH prevention and response Action Plan.
- Stakeholder consultations, including the participation of the communities that will take place throughout the life of the project, every six months, will help to inform GBV risk mitigation in the project.
- Raise awareness on activities relating to the registration of women's land rights to educate the population of the benefits.
- The Ministry of Agriculture (MOA) CPCU Social safeguard specialist will conduct a GBV service providers mapping in collaboration with regional Agricultural focal points.
- Organize regular monitoring sessions for multi-sectoral service providers (Health, case management and psychosocial support, safety/police, and legal service providers) on GBV guiding principles.
- MoA Social safeguard Specialist to work with Ministry of Gender, Ministry of Health, GBV networks and other Multi-sectoral service providers to develop GBV referral pathways.
- Publicly post or otherwise disseminate messages prohibiting SEA/SH at project intervention sites, whether the project workers are perpetrators or survivors.
- This can include the development, adaptation, translation, and dissemination of communication materials (through local and community radio, posters, banners, community forums etc.) outlining unacceptable behavior on SEA/H and, where relevant, referencing existing staff rules for civil servants, NGOs, and other actors in the project activities that may already be in place. Key messages should be disseminated focusing on i) No sexual or other favor can be requested; ii) Project staff are prohibited from engaging in sexual exploitation and abuse; iii) Any case or suspicion of sexual exploitation and abuse can be reported to the relevant authorities and; iv) the importance of timely services/services available.
- The Ministry of Agriculture Central Project Coordination Unit Social Safeguard Specialists to work with the Ministry of Lands, Regional Governments and Religious Affairs (MoLRGRA), Ministry of

Gender and Children and Social Welfare (MoGCSW), Ministry of Health, Department of Water Resources (DWR), National Water and Electricity Company (NAWEC) water division, GBV networks, and other Multi-sectoral service providers to create GBV response centers within the project intervention areas. Trained medical doctors and psychologists to provide rehabilitation services for GBV Victims.

- Project staff will sign Codes of Conduct (CoC);
 - CoC can be mentioned in routine project protocol briefings
 - Include sessions on SEA/SH awareness training and capacity building of the project team. ⁴The focus will be on sharing key messages (as above) with project staff, including contractors and their staff.

3.2. SEA/SH Prevention and Response Plan

- Establish GBV-sensitive channels for reporting in the project Grievance Redress Mechanism (GRM)
- Clearly define the GBV requirements and expectations in the bid documents and the necessary actions in the CoCs. See Annex 2.
- The project-relevant sites will ensure that separate on-site toilet and hygiene facilities are available and functional for men and women working, including inside-locking doors and appropriate lighting.
- Coordinate with school communities and organize activities/disseminate information on SEA targeting adolescent girls.
- Operationalization of this SEA/SH Prevention and Response Plan: Project Annual Work Plan and Budget.
- The MoA CPCU will ensure the commitments and planned activities in this SEA/SH Prevention and Response Plan are operationalized through the project's annual work plan and budget. The CPCU must include environmental and social activities in this SEA/SH Prevention and Response Plan with the estimated budget in the annual work plan and budget.

⁴ The implementing entity should focus on establishing referral pathway and training/orienting service providers/key stakeholders, at least on the guiding principles.

3.3. Detailed Action Plan for the Program

1. Create awareness on GBV in IA and contractors and the mechanisms that will be implemented						
	Action to Address GBV Risks	Timeline	Responsible Body	Budget	Monitoring	Remarks
a	MOA Social safeguard Specialist to support the implementation of the SEA/SH prevention and response Action Plan, including the development of SEA/SH awareness materials, referral pathways Update Social Safeguard Specialist Staffs' ToR/Job Description to include GBV responsibilities. Identify GBV focal points at the Regional levels for the MoA	At the beginning of the project implementation	MOA CPCU, & Regional Agriculture directorates	NA	Follow up for its functionality	
b	Develop Training Materials/key messages, in line with WB GBV Good Practice Note (GNP) recommendations, for project workers' sensitization, community awareness, and sensitization targeting MOA CPCU Safeguard Team and Contractor management and communities Develop training/communication materials and translate them to respective local languages Print communication materials Develop a communication and dissemination strategy	At the start of the project	MoA CPCU Safeguard Team	To be managed within existing budgets	Training & Communication Materials developed, Strategies developed	Training materials Should include at least the following topics as recommended in the GPN: Definition of GBV, SEA and SH, and how the project can exacerbate/contain GBV Roles and responsibilities of project stakeholders. Project staff Code of Conduct (CoC) Case reporting mechanism, accountability structures,
c	Awareness briefings conducted for CPCU, both male and female, Regional MoA representative, and community-level project stakeholders	During preparation and implementation	MoA CPCU Safeguard Team	To be managed within existing budgets	Reports on briefings	MOA CPCU Safeguard Team to provide technical support
2. GBV Risks adequately addressed in safeguards instruments						
a	Develop a SEA/SH prevention and response Action Plan, including an Accountability and Response framework to be included in ESMP, including site-specific ESMPs	During the Project preparation and implementation	MOA CPCU Safeguard Team	Part of regular staff activities	Ongoing review during implementation support missions. Update project ESMP if the risk situation changes.	WB and other relevant actors to provide technical support.
b	Include the underlying GBV risks and social situation in the project's social assessment using the GBV risk assessment tool.	During preparation	MOA CPCU Safeguard Team (assigned for social assessment and ESMP)	Follow-up for its functionality	Ongoing review during implementation support missions. Update project ESMP and Contractor's	

1. Create awareness on GBV in IA and contractors and the mechanisms that will be implemented						
	Action to Address GBV Risks	Timeline	Responsible Body	Budget	Monitoring	Remarks
					ESMP (C-ESMP) if the risk situation changes.	
3. Stakeholder consultations to inform those affected by the project of GBV risks						
a	Consultations need to be continuous throughout the project cycle	Every quarter for the entire life of the project	Ministry of Agriculture-CPCU	Part of regular activities	Monitoring of implementation of Stakeholder Engagement Plan. Ongoing consultations, particularly when C-ESMP is updated.	To be planned and plan submitted by MOA CPCU as part of the GBV Action plan.
b	Engage a variety of stakeholders (political, cultural, or religious leaders, health teams, local councils, social workers, DCD women's organizations, NGOs and groups working with Children and girls)	Consultations need to be done on quarterly basis	MOA- CPCU Safeguard Team	Part of regular activities	Monitoring of Implementation of Stakeholder Engagement Plan. Ongoing consultations, particularly when C-ESMP is updated.	
c	Establish GBV response mechanism for workers and communities	Throughout Project Implementation	Ministry of Agriculture-CPCU	Part of regular activities	Monitoring of implementation of Stakeholder Engagement Plan.	
d	Conduct awareness/disseminate key SEA/SH messages targeting school communities (adolescent girls and women)	Throughout the project implementation	MoA	Part of regular activity	Information dissemination session report	As the project is implemented near schools, adolescent girls and women could be exposed to SEA by project staff/labour influx.
4. Map out GBV prevention and response service providers						
a	Map out GBV prevention and response actors in project influence areas and beyond.	During preparation and Implementation	MOA, GBV focal point, and women and Children Affairs offices	To be covered by MOA	Update mapping as appropriate	WB to provide technical support as appropriate
b	Organize periodic induction/mentoring sessions for multi-sectoral GBV service providers on GBV guiding principles.	During Project Implementation (quarterly or every 6 months)	MoA CPCU Safeguard Team and Regional GBV focal points		Monitoring session reports	
c	Support the development of GBV referral pathways	During implementation	MoA Social safeguard Specialist, Regional GBV focal points and at the regional level Ministry of Gender	MoA	Review and update Referral pathways as needed	

1. Create awareness on GBV in IA and contractors and the mechanisms that will be implemented						
	Action to Address GBV Risks	Timeline	Responsible Body	Budget	Monitoring	Remarks
	Support the creation of GBV rehabilitation Centers (One stop Centre)	During the project implementation	MoA-CPCU	Within Project budget line		The WB should give TA in the establishment of this centers
d	Disseminate information, in collaboration with GBV partners, on the GBV referral pathway and the importance of timely seeking services.	During implementation	MoA CPCU Safeguard Team & GBV service providers			Key GBV messages to be integrated in GBV service providers' existing outreach strategies (e.g., health extension workers)
e	Review the IA's capacity to prevent and respond to GBV as part of Safeguard Preparation.	During Preparation and Implementation.	MoA CPCU Safeguard Team	Part of regular activities	Ongoing review during implementation support missions. Update project ESMP if the risk situation changes.	
5. GBV sensitive channels for reporting in the Grievance Redress Mechanism (GRM)						
a	Make certain an effective grievance redress mechanism with multiple channels is available to initiate a complaint at MOA and regional levels. Establish SEA/SH allegations reporting channels Recommend including a GBV hotline (as appropriate) Conduct training of SEA/SH focal points	Ongoing after amending contract with GBV Service Provider	Ministry of Agriculture-CPCU	Financed by the Project's budget	Regular monitoring and reporting on GRM to verify it is working as intended and evaluate its quality by MOA and WB	MOA-CPCU and other actors review regularly GRM functions
b	Verify working GRM for GBV is in place and work with GBV Services Providers to raise awareness of the GRM and refer project-related cases to GRM as per survivors' wishes and consent.	During the preparation of the project	MoA	Part of regular activities	Ongoing reporting	
c	Review that the GRM receives and processes complaints on time, referring to an established mechanism to review and address GBV complaints.	During project implementation	MoA CPCU Safeguard Team	NA	Ongoing reporting. Monitoring of complaints and their resolution	
6. Code of Conduct						
a	Project team to organize induction sessions for workers regularly (within a month of any new hire) Review existing code of conduct to establish coverage of SEA/SH	Once a month if there are new hires	GBV Specialist in GBV Service Provider	To be included in the contract	Training reports	MOA -CPCU ensures budget allocation

1. Create awareness on GBV in IA and contractors and the mechanisms that will be implemented						
	Action to Address GBV Risks	Timeline	Responsible Body	Budget	Monitoring	Remarks
	Factor key SEA/SH messages in the orientation training session for the Project team and collaborators. Raise awareness routinely on SEA/SH prohibitions and related messages (toolbox sessions/weekly/daily project staff briefing).					
b	Evaluate the contractor's GBV response proposal in the C-ESMP and confirm the contractor's ability to meet the project's GBV requirements before finalizing the contract.	During procurement time	MoA CPCU Safeguard Team	NA	Reviewed by SC /safeguard team	
c	The contractor to present the CoC and ensure that all workers and managers sign the CoC. CoC must meet WB minimum standards.	For all employees	Contractors	NA	Signed CoCs	MOA review CoCs to ensure minimum standards (WB to share sample CoC contextualization to this project)
7. Separate toilet and shower facilities for men and women						
a	Site inspection to verify the existence	Prior to work commencing.	MOA CPCU Safeguard Team	Regional officer and safeguard team	Site visit reporting and reviews during Implementation support missions.	
b	Contractor to ensure separate shower and toilet facilities are available.	Prior to work commencing.	Contractor/Supervision Consultant or Safeguard Team.	Part of regular Operational budget for a contractor	Subsequent site visit report, Reviews during Implementation support missions.	
8. Potential Risks Associated with Land Registration						
a	Risks associated customary land registration	Prior to work commencing.	MOA CPCU Safeguard Team and MLRGRA	Part of regular Operational budget for a contractor	Registration reports	MOA CPCU Safeguard Team
b	Sensitization on customary land registration activities	Prior to work commencing.	MOA CPCU Safeguard Team and MLRGRA	Part of regular Operational budget for a contractor	Key GBV messages to be integrated in GBV service providers' existing outreach strategies (e.g., health extension workers)	to provide technical support

4. Annex

4.1. Annex 1: List of Social Workers Per Region With Their Contacts

Department of Social Welfare

No.	Name	Institution	Region	Contact
1.	Harriet Bass	DSW (Department of Social Welfare)	Greater Banjul and KM (Kanifing Municipality – Region One	9331273
2.	Haruna Badjie	DSW (Department of Social Welfare)	West Coast Region – Region Two	3756247
3.	Alasana Sanneh	DSW (Department of Social Welfare)	North Bank – Region Three	7814900
4.	Hamadi Jobe	DSW (Department of Social Welfare)	Lower River – Region Four	3988940
5.	Lamin Ceesay	DSW (Department of Social Welfare)	Central River – Region Five	3216571
6.	Kebba Jatta	DSW (Department of Social Welfare)	Upper River – Region Six	7777061

List of Police Commissioners in Various Regions With Their Contacts

No	Name	Institution	Region	Contact
1.	Commissioner of Police Alhaji Kinteh	Police Medic	Banjul – Region One	3912113/ 9912113
2.	Commissioner of Police Lala Camara	Banjul Headquarter	Banjul – Region One	9988168
3.	Commissioner of Police Adline Basangeh	PIU (Police Intervention Unit)	KM (Kanifing Municipality – Region One)	2508276/ 9963032
4.	Commissioner of Police Pateh SH Jallow	Kairaba Station	KM (Kanifing Municipality – Region One)	3671900
5.	Commissioner of Police Khalilou Njie	Brikama	WCR (West Coast Region) Region Two	2055088 1
6.	Commissioner of Police Ansumana Kinteh	Kerewan	NBR (North Bank Region)	3223830
7.	Commissioner of Police Omar Darboe	Bansang	CRR (Central River Region) Region Five	7797375
8.	Commissioner of Police Famara Jallow	Basse	URR (Upper River Region) Region Six	2145231
9.	Commissioner of Police Ken Mendy	Mansakonko	LRR (Lower River Region) Region Four	7981241
10.	Commissioner of Police King Colley	Kanifing	Mobile Traffic	2135525

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.

List of Police Gender and Child Welfare Officers in All Regions With Their Contacts.

No.	Name	Institution	Region	Contact
1.	Jainaba Bojang	Police	Central River Region/Bansang	3948755
2.	Adama Sanneh	Police	CRR/ Janjangburay	3970305
3.	Awa Jallow	Police	CRR/Jareng	7511616
4.	Sarjo Barry	Police	CRR/Kuntaur	3970205
5.	Kawsu Fatty	Police	CRR/ Brikamaba	3970275/3188520
6.	Awa Ceesay (Station Officer)	Police	West Coast Region/New Yundum	3949282
7.	ASP Fatou Mboge	Police	West Coast Region/ Yundum – Region Two	3433326
8.	Foday Ceesay (Inspector)	Police	WCR/Brikama – Region Two	3950074
9.	Fatou Njie (Chief Inspector)	Police	WCR/ Brusubi – Region Two	3908032
10.	Bajen Samba (Chief Inspector)	Police	WCR/Brikama Missira, Kabafita Station – Region Two	3511058
10.	Ya Awa Njie	Police	WCR/ Brikama Jiddah – Region Two	3949289
No.	NAME	INSTITUTION	REGION	CONTACT
11.	Sergeant Mariama Jarjou	Police	WCR/ Sukuta Station – Region Two	3949896
12.	Sergeant Mai Bah	Police	WCR/Farato – Region Two	3950302

No.	Name	Institution	Region	Contact
13.	Adama Colley	Police	WCR/ Mandinaba – Region Two	3971983
14.	Corporal Kawsu Ceesay	Police	WCR/Tujereng – Region Two	7230255
15.	Corporal Mariama Darboe	Police	WCR/Old Yundum – Region Two	3972342
16.	Sub Inspector Nyima Jammeh	police	WCR/ Mandinari – Region Two	3961271
17.	SG Dembo Manneh	Police	WCR/Sibanor – Region Two	3137754
18.	Corporal Aminata Daffeh	Police	WCR/ Latriya – Region Two	7748387
19.	Corporal Mariama Sambou	Police	WCR/ Kalagi – Region Two	3971984
20.	First Class Lamin Jammeh	police	WCR/ Sanyang Station – Region Two	7841065
21.	Corporal Mam Fatou Saidy	Police	WCR/Wellingara – Region Two	3997252
22.	Corporal Ida Sarr	Police	WCR/ Kunkujang – Region Two	3972477
No.	NAME	INSTITUTION	REGION	CONTACT
23.	Inspector Manyima Bojang	Police	WCR/ Salandinto – Region Two	3948532
24.	Fatou Ceesay	Police	URR / Basse - Upper Region – Region Six	7999061

No.	Name	Institution	Region	Contact
25.	Matarr Saidykhan	Police	URR/Basse - Upper Region – Region Six	2386189
26.	Marie Jain/Haddy Bah	Police	NBR/Farafenni – Region Three – Region Three	7079924/2024764
27.	Mariama Drammeh	Police	NBR/ Barra – Region Three	3970641
28.	Bakoto Secka	Police	NBR/Barra – Region Three	3146219
29.	Assistant Commissioner Ramou Sambou (OC)	Police Headquarter Banjul	Police Headquarters – Banjul – Region One	3969299
30.	DSP Jainaba Bahoum	Serrekunda Station	KM (Kanifing Municipality – Region One	3950167

4.2. Code of Conduct background

The purpose of these Codes of Conduct and Action Plan for Implementing ESHS and OHS Standards, and Preventing Gender Based Violence (GBV) and Violence Against Children (VAC) is to introduce a set of key definitions, core Codes of Conduct, and guidelines that:

- i. Clearly define obligations on all project staff (including sub-contractors and day workers) with regard to implementing the project’s environmental, social, health and safety (ESHS) and occupational health and safety (OHS) requirements and;
- ii. Help prevent, report and address GBV and VAC within the work site and in its immediate surrounding communities.

Applying these Codes of Conduct will help ensure the project meets its ESHS and OHS objectives, as well as preventing and/or mitigating the risks of GBV and VAC on the project and in the local communities.

These Codes of Conduct are to be adopted by those working on the project and are meant to:

- i. create awareness of the ESHS and OHS expectations on the project;
- ii. create common awareness about GBV and VAC and:
 - (a) Ensure a shared understanding that they have no place in the project; and,
 - (b) Create a clear system for identifying, responding to, and sanctioning GBV and VAC incidents.

Ensuring that all project staff understand the project's values, expectations for all employees, and acknowledge the consequences for violations of these values will help to create smoother, more respectful, and productive project implementation thereby helping ensure that the project's objectives will be achieved.

4.2.1. Definitions

The following definitions apply:

Environmental, Social, Health and Safety (ESHS): an umbrella term covering issues related to the project's impact on the environment, communities, and workers.

Occupational Health and Safety (OHS): Occupational health and safety is concerned with protecting the safety, health and welfare of people engaged in work or employment. The enjoyment of these standards at the highest levels is a basic human right that should be accessible by each worker.

Gender-Based Violence (GBV): is an umbrella term for any harmful act that is perpetrated against a person's will and **that is based on socially ascribed (i.e., gender) differences between males and females**. It includes acts that inflict physical, sexual, or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private. The term GBV is used to underscore systemic inequality between males and females (which exists in every society in the world). It acts as a unifying and foundational characteristic of most forms of violence perpetrated against women and girls. The 1993 United Nations Declaration on the Elimination of Violence against Women defines violence against women as "any act of gender-based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women."⁵ The six core types of GBV are:

- **Rape:** Is a type of sexual Assault involving sexual intercourse or other forms of sexual penetration conducted against a person without their consent (however slight) either through the vagina, anus, or mouth other body parts.
- **Sexual Assault:** any form of non-consensual sexual contact or behavior that does not result in or include penetration. Examples include attempted rape, as well as unwanted kissing, fondling, or touching of genitalia and buttocks.
 - **Sexual Harassment:** is unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature. Sexual harassment is not always explicit or obvious, it can include implicit and subtle acts but always involves a power and gender dynamic in which a person in power uses their position to harass another based on their gender. Sexual conduct is unwelcome whenever the person subjected to it considers it unwelcome (e.g., looking somebody up and down; kissing, howling, or smacking sounds; hanging around somebody; whistling and catcalls; in some instances, giving personal gifts).
 - **Sexual Favors:** is a form of sexual harassment and includes making promises of favorable treatment (e.g., promotion) or threats of unfavorable treatment (e.g., loss of job) dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior.

⁵ It is important to note that women and girls disproportionately experience violence; overall 35 percent of women worldwide have faced physical or sexual violence (WHO, Global and regional estimates of violence against women: prevalence and health effects of intimate partner violence and non-partner sexual violence, 2013). Some men and boys also face violence based on their gender and unequal power relationships.

- **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.
- **Forced Marriage:** the marriage of an individual against her or his will or a marriage of a minor.
- **Denial of Resources, Opportunities or Services:** denial of rightful access to economic resources/assets or livelihood opportunities, education, health, or other social services (e.g., 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 / Emotional Abuse:** infliction of mental or emotional pain or injury. Examples include threats of physical or sexual violence, intimidation, humiliation, forced isolation, stalking, harassment, unwanted attention, remarks, gestures, or written words of a sexual and/or menacing nature, destruction of cherished things, etc.
- **Violence Against Children (VAC):** is defined as physical, sexual, emotional and/or psychological harm, neglect, or negligent treatment of minor children (i.e., under the age of 18), including exposure to such harm,⁶ that results in actual or potential harm to the child's health, survival, development, or dignity in the context of a relationship of responsibility, trust, or power. This includes using children for profit, labor⁷, sexual gratification, or some other personal or financial advantage. This also includes other activities such as using computers, mobile phones, video, and digital cameras or any other medium to exploit or harass children or to access child pornography.

Grooming: are behaviors that make it easier for a perpetrator to procure a child for sexual activity. For example, an offender might build a relationship of trust with the child and then seek to sexualize that relationship (for example, by encouraging romantic feelings or exposing the child to sexual concepts through pornography).

- **Seduction of Children /Online Grooming:** By the use of deception, coercion, debt bondage or any means whatsoever, induce a child to go from one place to another to do any act with intent that the child may be, or knowing that it is likely that he or she will be, forced or seduced to have sexual intercourse with another person⁸.
- **Accountability Measures are the measures put in place to ensure survivors' confidentiality and** hold contractors, consultants, and the client responsible for instituting a fair system of addressing cases of GBV and VAC.
- **Contractors Environmental and Social Management Plan (CESMP):** the plan prepared by the contractor outlining how they will implement the works activities in accordance with the project's environmental and social management plan (ESMP).
- **Child:** is used interchangeably with the term 'minor' and refers to a person under the age of 18. This is in accordance with Article 1 of the United Nations Convention on the Rights of the Child.

⁶ Exposure to GBV is also considered VAC.

⁷ The employment of children must 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. They must also be able to meet the project's Occupational Health and Safety competency standards.

⁸ GoTG (2005) Children's Act, 2005, section 27 (1)

- **Child Protection (CP):** is an activity or initiative designed to protect children from any harm, particularly arising from VAC.
- **Consent:** is the informed choice underlying an individual's free and voluntary intention, acceptance, or agreement to do something. No consent can be found when such acceptance or agreement is obtained using threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even if national legislation of the country into which the Code of Conduct is introduced has a lower age⁹ Mistaken belief regarding the age of the child and consent from the child is not a defense.
- **Consultant:** is as any firm, company, organization individual or other institution that has been awarded a contract to provide consulting services to the project and has hired managers and/or employees to conduct this work.
- **Contractor:** any firm, company, organization, or other institution that has been awarded a contract to conduct infrastructure development works for the project and has hired managers and/or employees to conduct this work. This also includes sub-contractors hired to undertake activities on behalf of the contractor.
- **Employee:** is any individual offering labor to the contractor or consultant within the country on or off the work site, under a formal or informal employment contract or arrangement, typically, but not necessarily (e.g., including unpaid interns and volunteers), in exchange for a salary, with no responsibility to manage or supervise other employees.
- **GBV and VAC Allegation Procedure:** is the prescribed procedure to be followed when reporting incidents of GBV or VAC.
- **GBV and VAC Codes of Conduct:** The Codes of Conduct adopted for the project cover the company's commitment, and the responsibilities of managers and individuals regarding GBV and VAC.
- **GBV and VAC Compliance Team (GCCT):** a team established by the project to address GBV and VAC issues.
- **Grievance Redress Mechanism (GRM):** a process established by a project to receive and address grievance complaints.
- **Manager:** is any individual offering labor to the contractor or consultant, on or off the work site, under a formal or informal employment contract and in exchange for a salary, with the responsibility to control or direct the activities of a contractor's or consultant's team, unit, division or similar, and to supervise and manage a pre-defined number of employees.
- **Perpetrator:** the person(s) who commit(s) or threaten(s) to commit an act or acts of GBV or VAC.
- **Response Protocol:** is the mechanism set in place to respond to cases of GBV and VAC (see Section 4.7 Response Protocol).
- **Survivor/Survivors:** the person(s) adversely affected by GBV or VAC. Women, men and children can be survivors of GBV; children can be survivors of VAC.
- **Work Site:** is the area in which infrastructure development works are being conducted, as part of the project. Consulting assignments are considered to have the areas in which they are active as their work sites.
- **Work Site Surroundings:** is the 'Project Area of Influence' which are any area, urban or rural, directly affected by the project, including all human settlements found on it.

⁹ GoTG (2005) Children's Act, 2005, interpretation section 2 (1)

4.2.2. Project Code of Conduct

Implementing ESHS and OHS Standards

Preventing Gender Based Violence and Violence against Children

The project is committed to ensuring that the project is implemented in such a way that minimizes any negative impacts on the local environment, communities, and its workers. This will be done by respecting the environmental, social, health and safety (ESHS) standards and meeting appropriate occupational health and safety (OHS) standards. The project is also committed to creating and maintaining an environment in which gender-based violence (GBV) and violence against children (VAC) have no place and where they will not be tolerated by any employee, sub-contractors, supplier, associate, or representative of the company.

Therefore, to ensure that all those engaged in the project are aware of this commitment, the project commits to the following core principles and minimum standards of behavior that will apply to all company employees, associates, and representatives, including sub-contractors and suppliers, without exception:

General

1. The project—and therefore all employees, associates, representatives, sub-contractors, and suppliers—commits to complying with all relevant national laws, rules, and regulations.
2. The project commits to full implementing its ‘Contractors Environmental and Social Management Plan’ (CESMP).
3. The project commits to treating women, children (persons under the age of 18), differential in able persons, and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic, or social origin, property, birth or other status. Acts of GBV and VAC violate this commitment.
4. The project shall ensure that interactions with local community members are done with respect and non-discrimination.
5. Demeaning, threatening, harassing, abusive, culturally inappropriate, or sexually provocative language and behavior are prohibited among all project employees, associates, and its representatives, including sub-contractors and suppliers.
6. The project will follow all reasonable work instructions (including regarding environmental and social norms).
7. The project will protect and ensure proper use of the property (for example, to prohibit theft, carelessness, or waste).

Health and Safety

8. The project will ensure that project staff, sub-contractors, and suppliers effectively implement the project's occupational health and safety (OHS) Management Plan.
9. The company will ensure that all persons on-site wear prescribed and appropriate personal protective equipment, preventing avoidable accidents and reporting conditions or practices that pose a safety hazard or threaten the environment.
10. The project will:
 - i. Prohibit the use of alcohol during work activities.
 - ii. Prohibit the use of narcotics or other substances which can impair faculties at all times.
 - iii. The project will institute administrative control mechanism ensure all employees comply with set OHS SOPs.
 - iv.
11. The project will ensure that adequate sanitation facilities are available on site and at any worker accommodations provided to those working on the project.

Gender-Based Violence and Violence Against Children

12. Acts of GBV or VAC constitute gross misconduct and are, therefore, grounds for sanctions, which may include penalties and/or termination of employment, and if appropriate, referral to the Police for further action.
13. All forms of GBV and VAC, including grooming are unacceptable, regardless of whether they take place on the work site, the work site surroundings, at worker's camps or within the local community.
 - i. Sexual Harassment—for instance, making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, including subtle acts of such behavior, is prohibited.
 - ii. Sexual favors—for instance, making promises or favorable treatment dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior are prohibited.
14. Sexual contact or activity with children under 18 including through digital media is prohibited. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
15. Unless there is full consent¹⁰ by all parties involved in the sexual act, sexual interactions between the projects' employees (at any level) and members of the communities surrounding the workplace are prohibited. This includes relationships involving the withholding/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.
16. In addition to the project sanctions, legal prosecution of those who commit acts of GBV or VAC will be pursued if appropriate.

¹⁰ **Consent** is defined as the informed choice underlying an individual's free and voluntary intention, acceptance, or agreement to do something. No consent can be found when such acceptance or agreement is obtained using threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even if national legislation of the country into which the Code of Conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defense.

17. All employees, including volunteers and sub-contractors are highly encouraged to report suspected or actual acts of GBV and/or VAC by a fellow worker, whether in the same project or not. Reports must be made in accordance with project's GBV and VAC Allegation Procedures.
18. Managers are required to report and act to address suspected or actual acts of GBV and/or VAC as they are responsible for upholding project company commitments and holding their direct reports responsible.

Implementation

To ensure that the above principles are implemented effectively the company commits to ensuring that:

19. All managers sign the project's 'Manager's Code of Conduct' detailing their responsibilities for implementing the project's commitments and enforcing the responsibilities in the 'Individual Code of Conduct.'
20. All employees sign the project's 'Individual Code of Conduct' confirming their agreement to comply with ESHS and OHS standards, and not to engage in activities resulting in GBV or VAC.
21. Displaying the project and Individual Codes of Conduct prominently and clearly at workers' camps, offices, and in public areas of the workspace. Examples of areas include waiting, rest and lobby areas of sites, canteen areas and health clinics.
22. Ensure that posted and distributed copies of the project and Individual Codes of Conduct are translated into the appropriate language of use in the work site areas and for any international staff in their native language.
23. An appropriate person is nominated as the project's 'Focal Point' for addressing GBV and VAC issues, including representing the project on the GBV and VAC Compliance Team (GCCT), which is comprised of representatives from the client, contractor(s), the supervision consultant, and local service provider(s).
24. Ensuring that an effective GBV and VAC Action Plan is developed in consultation with the GCCT, which includes, as a minimum:
 - i. **GBV and VAC Allegation Procedure** to report GBV and VAC issues through the project Grievance Redress Mechanism (Section 4.3 Action Plan);
 - ii. **Accountability Measures** to protect the confidentiality of all involved (Section 4.4 Action Plan); and,
 - iii. **Response Protocol** applicable to GBV and VAC survivors and perpetrators (Section 4.7 Action Plan).
25. That the project effectively implements the agreed final GBV and VAC Action Plan, providing feedback to the GCCT for improvements and updates as appropriate.
26. All employees attend an induction training course prior to commencing work on site to ensure they are familiar with the company's commitments to ESHS and OHS standards, and the project's GBV and VAC Codes of Conduct.
27. All employees attend a mandatory training course once every quarter for the duration of the contract starting from the first induction training prior to commencement of work to reinforce the understanding of the project's ESHS and OHS standards and the GBV and VAC Code of Conduct.

I do hereby acknowledge that I have read the previous project Code of Conduct, and on behalf of the project agree to comply with the standards contained therein. I understand my role and responsibilities to support the project's OHS and ESHS standards, and to prevent and respond to GBV and VAC. I understand that any action inconsistent with this project Code of Conduct or failure to act mandated by this project Code of Conduct may result in disciplinary action.

Company name: _____

Signature: _____

Printed Name: _____

Title: _____

Date: _____

4.2.3. Manager's Code of Conduct

Implementing ESHS and OHS Standards

Preventing Gender Based Violence and Violence against Children

Managers at all levels are responsible for upholding the Project's commitment to implementing the ESHS and OHS standards, and preventing and addressing GBV and VAC. This means that managers have an acute responsibility to create and maintain an environment that respects these standards and prevents GBV, and VAC. Managers need to support and promote the implementation of the Company Code of Conduct. To that end, managers must adhere to this Manager's Code of Conduct and sign the Individual Code of Conduct. This commits them to supporting the implementation of the CESMP and the OHS Management Plan and developing systems that facilitate the implementation of the GBV and VAC Action Plan. They need to maintain a safe workplace and a GBV-free and VAC-free environment at the workplace and in the local community. These responsibilities include but are not limited to:

Implementation

1. To ensure maximum effectiveness of the project and Individual Codes of Conduct:
 - i. Prominently displaying the project and Individual Codes of Conduct in clear view at workers' camps, offices, and public workspace areas. Examples of areas include waiting, rest and lobby areas of sites, canteen areas and health clinics.
 - ii. Ensuring all posted and distributed copies of the project and Individual Codes of Conduct are translated into the appropriate language of use in the work site areas as well as for any international staff in their native language.
2. Verbally and in writing explain the project and Individual Codes of Conduct to all staff.
3. Ensure that:
 - i. All direct reports sign the 'Individual Code of Conduct,' acknowledging that they have read and agree with the Code of Conduct.
 - ii. Staff lists and signed copies of the Individual Code of Conduct are provided to the ESHS Manager, the GCCT, and the client.
 - iii. Participate in training and ensure that staff also participates as outlined below.
 - iv. Put in place a mechanism for staff to:
 - a. report concerns on ESHS or OHS compliance; and,
 - b. confidentially report GBV or VAC incidents through the Grievance Redress Mechanism (GRM)
 - i. Staffs are encouraged to report suspected or actual ESHS, OHS, GBV or VAC issues, emphasizing the staff's responsibility to the project and the country hosting their employment and the respect for confidentiality.
4. In compliance with applicable laws and to the best of your abilities, prevent perpetrators of sexual exploitation and abuse from being hired, re-hired, or deployed. Use background and criminal reference checks for all employees.
5. Ensure that when engaging in partnership, sub-contractor, supplier or similar agreements, these agreements:
 - i. Incorporate the ESHS, OHS, GBV and VAC Codes of Conduct as an attachment.
 - ii. Include the appropriate language requiring such contracting entities, individuals, and their employees and volunteers to comply with the Individual Codes of Conduct.
 - iii. Expressly state that the failure of those entities or individuals, as appropriate, to ensure compliance with the ESHS and OHS standards, take preventive measures against GBV and VAC, to investigate allegations thereof, or to take corrective actions when GBV or VAC has occurred, shall not only constitute grounds for

sanctions and penalties in accordance with the Individual Codes of Conduct but also termination of agreements to work on or supply the project.

6. Provide support and resources to the GCCT to create and disseminate internal sensitization initiatives through the awareness-raising strategy under the GBV and VAC Action Plan.
7. Ensure that any GBV or VAC issue warranting Police action is reported to the Police, the client, and the World Bank immediately.
8. Report and act according to the response protocol (Section 4.7 Response Protocol) any suspected or actual acts of GBV and/or VAC as managers are responsible for upholding project company commitments and holding their direct reports responsible.
9. Ensure that any major ESHS or OHS incidents are reported to the supervision engineer immediately.

Training

10. The managers are responsible to:
 - i. Ensure that the OHS Management Plan is implemented, with suitable training required for all staff, including sub-contractors and suppliers; and,
 - ii. Ensure that staff understand the CESMP and are trained as appropriate to implement the CESMP requirements.
11. All managers must attend an induction manager training course before commencing work on site to ensure that they are familiar with their roles and responsibilities in upholding the GBV and VAC elements of these Codes of Conduct. This training will be separate from the induction training course required of all employees. It will provide managers with the necessary understanding and technical support to begin developing the GBV and VAC Action Plan for addressing GBV and VAC issues.
12. Managers must attend and assist with the project facilitated quarterly training courses for all employees. Managers will be required to introduce the trainings and announce the self-evaluations, including collecting satisfaction surveys to evaluate training experiences and provide advice on improving training effectiveness.
13. Ensure that time is provided during work hours and that staff prior to commencing work on site attend the mandatory project facilitated induction training on:
 - i. OHS and ESHS; and,
 - ii. GBV and VAC are required of all employees.
14. During civil works, ensure that staff attends ongoing OHS and ESHS training, as well as the quarterly mandatory refresher training course required of all employees to combat the increased risk of GBV and VAC.

Response

15. Managers must take appropriate actions to address any ESHS or OHS incidents.
16. With regard to GBV and VAC:
 - i. Provide input to the GBV and VAC Allegation Procedures (Section 4.2 Action Plan) and Response Protocol (Section 4.7 Action Plan) developed by the GCCT as part of the final cleared GBV and VAC Action Plan.
 - ii. Once adopted by the project, managers will uphold the Accountability Measures (Section 4.4 Action Plan) outlined in the GBV and VAC Action Plan to maintain the confidentiality of all employees who report or (allegedly) perpetrate incidences of GBV and VAC (unless a breach of confidentiality is required to protect persons or property from serious harm or where required by law).
 - iii. Suppose a manager develops concerns or suspicions regarding any form of GBV or VAC by one of his/her direct reports, or by an employee working for another

contractor on the same work site. In that case, s/he is required to report the case using the GRM.

- iv. Once a sanction has been determined, the relevant manager(s) is/are expected to be personally responsible for ensuring that the measure is effectively enforced, within a maximum time of 14 days from the date on which the decision to sanction was made
 - v. If a Manager has a conflict of interest due to personal or familial relationships with the survivor and/or perpetrator, he/she must notify project and the GCCT. The project will be required to assign another manager or senior officer without a conflict of interest to respond to complaints.
 - vi. Ensure that any GBV or VAC issue warranting Police action is reported to the Police immediately, the client and the World Bank immediately
17. Managers failing to address ESHS or OHS incidents or failing to report or comply with the GBV and VAC provisions may be subject to disciplinary measures, to be determined and enacted by the project, Managing Director, or equivalent highest-ranking manager. Those measures may include:
- i. Informal warning.
 - ii. Formal warning.
 - iii. Additional Training.
 - iv. Loss of up to one week's salary.
 - v. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 12months.
 - vi. Termination of employment.
18. Failure to effectively respond to ESHS, OHS, GBV and VAC cases on the work site by the company's managers or CEO may provide grounds for legal actions by authorities.

I acknowledge that I have read the foregoing Manager's 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 requirements. I understand that any action inconsistent with this Manager's Code of Conduct or failure to act mandated by this Manager's Code of Conduct may result in disciplinary action.

Signature: _____

Printed Name: _____

Title: _____

Date: _____ Individual Code of Conduct

Implementing ESHS and OHS Standards

Preventing Gender Based Violence and Violence against Children

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

The project considers that failure to follow ESHS and OHS standards, or to partake in GBV or VAC activities—be it on the work site, the work site surroundings, at workers’ camps, or the surrounding communities—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 GBV, or VAC may be pursued if appropriate.

I agree that while working on the project I will:

1. Attend and actively partake in training courses related to ESHS, OHS, HIV/AIDS, GBV and VAC as requested by my employer.
2. I will always wear my personal protective equipment (PPE) when at the work site or engaged in project-related activities.
3. Take all practical steps to implement the contractor’s environmental and social management plan (CESMP).
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 that can impair faculties at all times.
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, with disabilities , birth, 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 harassment—for instance, making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, including subtle acts of such behavior (e.g., looking somebody up and down, kissing, howling, or smacking sounds; hanging around somebody; whistling and catcalls; giving personal gifts; making comments about somebody’s sex life; etc.).
10. Not engage in sexual favors—for instance, making promises or favorable treatment dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior.
11. 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.
12. Unless there is the full consent¹¹ by all parties involved, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.

¹¹ **Consent** is defined as the informed choice underlying an individual’s free and voluntary intention, acceptance, or agreement to do something. No consent can be found when such acceptance or agreement is obtained using threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even if national legislation of the country into which the Code of Conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defense.

13. Consider reporting through the GRM or to my manager any suspected or actual GBV or VAC by a fellow worker, whether employed by my project or not, or any breaches of this Code of Conduct.

With regard to children under the age of 18:

14. Wherever possible, ensure that another adult is present when working in the proximity of children.
15. Not invite unaccompanied children unrelated to my family into my home unless they are at immediate risk of injury or in physical danger.
16. 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).
17. Refrain from physical punishment or discipline of children.
18. 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.
19. Comply with all relevant local legislation, including labor laws about child labor and the World Bank’s safeguard policies on child labor and minimum age.
20. Take appropriate caution when photographing or filming children (See Annex 2 for details).

Use of children's images for work related purposes

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

21. Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.
22. Before photographing or filming a child, obtain informed consent from the parent or guardian of the child. As part of this, I must explain how the photograph or film will be used.
23. 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.
24. Ensure images are honest representations of the context and the facts.
25. Ensure file labels do not reveal identifying information about a child when sending images electronically.

Sanctions

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

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

I understand that I must 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 GBV or VAC. Any such actions will be a breach of this Individual Code of Conduct. I 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 act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signature: _____

Printed Name: _____

Title: _____

Date: _____