



**THE FEDERAL DEMOCRATIC REPUBLIC OF ETHIOPIA
AND
MINISTRY OF TRADE AND REGIONAL INTEGRATION
MINISTRY OF AGRICULTURE**

**DRAFT
GENDER-BASED VIOLENCE (GBV) ACTION PLAN**

**DE-RISKING, INCLUSION, AND VALUE ENHANCEMENT (DRIVE)
OF
PASTORAL ECONOMIES IN THE HORN OF AFRICA
(P176517)**

**April 2022
Addis Ababa, Ethiopia**

Project Background

De-Risking, Inclusion and Value Enhancement of Pastoral Economies Project (DRIVE) (P176717) is part of the Horn of African Initiative through Investment Project Financing of the World Bank. The proposed project is regional and will cover Ethiopia, Djibouti, Kenya, and Somalia.

The DRIVE project targets two types of beneficiaries. The first group includes pastoralists or agro-pastoralists that live in the arid and semi-arid areas of the country, particularly in Somali, Afar, Oromia and SNNP regions. But the project will target pastoralists in groups who have the capacity to become productive. The second group targets private investors in the livestock value chains that can lead to higher incomes for pastoral producers.

The project has two components. *Component 1* involves De-Risk and Financing. Through the activities under this component, the project supports access to financial service to the pastoralist production group. This will involve two major interventions: first, transfer pastoralists' drought risk to the insurance market and mobilize the capital of private (re)insurance companies on the total sum insured; and second, mobilize savings from pastoralists themselves that could be invested in other types of business, thus achieving income diversification and increasing their access to credit. *Component 2* concerns Livestock Value Chains and Trade Facilitation. This component intends to connect pastoralists better to markets through undertaking three subprojects: upgrading quality infrastructure; trade facilitation and trade logistics; and providing seed capital to attract private investment in the livestock value chains.

The GBV Action plan is part of the ESMF for the project which provides details of Ethiopia's Legal, Regulatory and Institutional framework and the requirements of the ESF relevant for this GBV Action Plan. Details on the implementation arrangements and budget for the management of environmental and social risks (including GBV) are also included in the ESMF.

The project may contribute to risks related to Gender-Based Violence that is **Sexual Exploitation and Abuse (SEA)** by project workers and **sexual harassment (SH)** between project workers.

- **Gender-Based Violence (GBV)** is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially-ascribed gender differences. GBV includes an act that inflicts physical, mental, sexual harm or suffering; threats of such acts; and coercion and other deprivations of liberty, whether occurring in public or in private life. GBV disproportionately affects women and girls across their lifespan and takes many forms, including sexual, physical, and psychological abuse. It occurs at home, on the streets, in schools, workplaces, farm fields, and refugee camps, during times of peace as well as in conflicts.

- **Sexual Exploitation** is defined as: “any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another.”¹
- **Sexual Abuse** is further defined as “the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.”²

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

- **Sexual Harassment** 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.”³

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

To this end, the project is establishing and implementing a SEA/SH Prevention and Response Action Plan. The Action Plan details the operational measures that will be put in place to mitigate the risks of SEA/SH that are project-related, including ensuring that project-established GRMs are in place to receive reports and refer survivors for further support safely and confidentially.

Description of the Project

Component 1 will transfer pastoralists’ drought risk to the insurance market and mobilize the capital of private (re) insurance companies (local and international) on the total sum insured, thereby reducing the financing that the government would have needed to address drought shocks out of scarce budgetary resources.

¹ See Sections 6.1 and 6.2 of Secretary-General’s Bulletin on “Special measures for protection from sexual exploitation and sexual abuse” (ST/SGB/2003/13), 9 October 2003. Examples of sexual exploitation include: a community member is promised employment on a TDB-financed project site in exchange for sex; a project worker connecting water lines to homes requests a sexual favor for access to water connection; a project worker denies a woman passage through the worksite unless she performs a sexual favor.

² Ibid. Examples of sexual abuse include: a project worker stays in the cafeteria after dinner and sexually assaults a kitchen staff member; a project worker touches an administrative staff member’s breasts and says there is more to come; a supervisor for a subcontractor asks his female colleague to join him for a business dinner with the main contractor, and after dinner he asks her to entertain “the boss” in his room as an appreciation for the contract and her work.

³ See Section 1.3 of Secretary-General’s Bulletin on “Prohibition of discrimination, harassment, including sexual harassment, and abuse of authority.” Examples of SH include: a project worker sends sexually explicit text messages to a coworker; a project worker leaves an offensive picture that is sexually explicit on a co-worker’s desk; a project worker asks all female employees to greet him with a kiss on the cheek every day before work.

DRIVE will support the delivery of a sustainable package of (i) savings for resilience, (ii) index-insurance, (iii) digital accounts, and (iv) financial education and awareness creation. Target beneficiaries will be pastoralist groups that are constituted around economic activities and have the potential to engage in commercial activities.

Component 2 intends to better include pastoralists in the livestock value chains and facilitate trade. The pastoralist groups that benefit from Component 1 would be linked to investment opportunities under Component 2. The Component will support private investment in the livestock value chains so that pastoral producers can be linked-to reliable markets and extract greater value addition from their livestock-rearing activities; the project will target pastoralist groups already formed.

This Action Plan speaks to both project components.

Table 1: Implementation and Budget Arrangements for the GBV Action Plan

Required personnel	Description of responsible tasks
Social Specialist in PIU	<p>Support in project monitoring</p> <p>Link the Gender specialist and the GBV working group to the Ministry of Agriculture</p> <p>Support in enhancing the buy-in of GBV interventions at the Ministry level</p> <p>Provide support during training and awareness processes.</p>
Gender Specialist	<p>Training on GBV with focus on PSEA/ SH</p> <p>Mapping the GBV Services Providers available for GBV survivors</p> <p>Review relevant documents such as code of conduct</p> <p>Create awareness to communities through the local GBV prevention and response stakeholders on PSEA and the GRM</p> <p>Sensitization of field teams on PSEA /SH, and the GRM</p> <p>In collaboration with Woreda level Women and Social Affairs office, establish GBV coordination mechanisms (GBV working groups)</p> <p>Link the Woreda GBV coordination mechanisms to the Social Specialist in PIU</p> <p>Monitor the implementation of the GBV work-plan, the referral mechanism and GRM</p> <p>Give appropriate guidance to woreda level women and social affairs offices and coordination mechanisms, and recommendations on areas</p>

	<p>needed review</p> <p>GBV Allegation Procedures: How the project will provide information to workers and the community on reporting of GBV cases.</p> <p>In collaboration with Woreda Women and Social affairs office, organize consultations with:</p> <ul style="list-style-type: none"> • Women and girls in the project area to identify project-related GBV risks • Community gatekeepers (religious leaders, elders, etc..) to identify and address behaviours and norms perpetuating violence against women and girls
<p>Woreda Governments (Woreda Women and Social Affairs Offices) /Woreda level GBV working group</p>	<p>Awareness Raising Strategy at woreda level</p> <p>Coordination of GBV prevention and response-related activities</p>

The budget for the GBV Action Plan is covered in the budget outlined in the ESMF for this component.

GBV Risks of the DRIVE - Project

There are a number of GBV risk factors that cut across several spheres including communities and institutions and, depending on their scope, they can exacerbate existing risks or can create new ones.

Women and girls are at particularly high risk of GBV because of societal norms that perpetuate power differentials between males and females and support or condone males’ violence against women and girls. An important additional risk factor is labor influx. Labor influx and the extent to which a community has capacity to absorb labor influx, as well as the inflow of income to workers, can exacerbate already existing inequities between workers and community members.

Several additional risk factors that aggravate the vulnerability of women and girls to SEA committed by project workers include high levels of poverty in the project area; large population of young women; low levels of education among women and girls; low rates of employment among women; low implementation level of response mechanisms; and high crime levels/violence in the larger community. It is for these reasons that the social risk classification for the project is High.

Some of the forms of SEA committed by project workers against women and girls in the community that could arise from the project include: rape and sexual assault, sexual harassment; unwanted sexual advances including touching; physical violence/assault; use of abusive, demeaning or culturally inappropriate language; transaction sex; and other forms of humiliating, degrading or exploitative behavior.

Similarly, SH is a risk for any work environment, particularly environments that are stringently hierarchal, give significant and/or undue power to management, and do not promote and reflect female leadership. Additional risk factors for SH include female laborers working alongside male laborers without adequate supervision of work sites; without separate latrine and other sanitation facilities for males and females; and without specific mechanisms, for females to share concerns about their working environments, including concerns about sexual harassment.

Prevention and response to project-related risks of GBV require multipronged efforts and sectors, including the government who are critical to ensuring that SEA and SH prevention and accountability mechanisms are in place.

The GBV risks are considered as High for the Project overall but this is influenced by the activities under Component 1. The project has been subject to the Bank's standard GBV risk assessment. The main risk has identified the abuse of trust, power and the exchange of favors carried out by staff, Specialists or workers of companies associated with the project. This risk is particularly relevant with regard to the provision of inputs to beneficiaries associated with Component 2. Furthermore, the project will not lead to an influx of labor, and the majority of interactions between beneficiaries and project workers will take place in public, which further limits the extent and possibility of this. The risk of sexual harassment in the workplace by the various workers in the project is also considered moderate. The table below presents the GBV Risk assessment for Component 2.

Table 2: GBV Screening result for the DRIVE -Ethiopia

Project Context	Response Answer	Risk Rating	Comment Risk Response mechanism
Is the project in an area with an active emergency or humanitarian situation?	Yes	High Risk	Most of the project area is an already fragile region. Over the past few years, consecutive shocks among them poor rainfall, flooding, macroeconomic crises, and armed conflict have contributed to a significant level of vulnerability in pastoralists and agro-pastoralist woredas. This mostly is in the Afar, Somali, Oromia and SNNP regions of Ethiopia.
How much infrastructure construction, upgrading or rehabilitation does the project entail?	Small	Low Risk	The project involves payment of insurance premiums. The Project may construct some small-scale construction of infrastructure to support livelihoods this may include hay stores, water pans, etc. No major civil works are expected.
what is the extent of the influx of labor associated with project activities?	Low	Moderate Risk	The project will require the recruitment of non-local staff for the implementation of activities, technical assistance, and awareness-raising activities. Given the scale of the work, labor influx is not anticipated.
During the preparation of the project, were consultations carried out with local residents, associations of women and children?	No	Moderate Risk	Women and women's associations were not consulted during the initial phase and during the preparation of the project because it was carried out as an emergency. Measures to ensure mobilization with women and women's associations have been integrated into the project's Stakeholder Engagement Plan.
During the consultations, were aspects of gender-based violence raised by the participating	No	Moderate Risk	No consultation was conducted with women groups.

women?			
Will military forces or private security agents be recruited under this project?	No	Low Risk	No, military forces and security agents will not be used for this component of the Project. Note they will be used for Component 1 which is subject to a separate GBV Action Plan by Component 1 implementer (ZEP-RE).
Does the project area include areas of high poverty?	Yes	High Risk	The pastoralist communities of Ethiopia have the lowest development indicators and the highest incidence of poverty in the country.
Is the project located in regions that are difficult to supervise (remote or difficult to access areas)?	Yes	Moderate Risk	Ethiopia's pastoralist communities, live in about 60% of the country's total land surface meaning that project activities are spread over a wide area which makes supervision more challenging.
Is the project located in an urban, peri-urban or rural area?	Rural	High Risk	The project is predominantly located in rural areas which affects access to service providers.
Are project activities on a school route or other routes that women and girls use to carry out their daily activities	Likely	Moderate Risk	Given the nature of the livelihood activities to be supported there is a high potential for activities to be undertaken where women and girls pass. However, works will be small in scale and no labor influx is expected.
Are women working near men without supervision?	Likely	Moderate Risk	Project workers will be supervised but there is the possibility that men and women may work in close proximity given the nature of activities.

Is there a National Action Plan on Addressing Violence Against Women and Girls/GBV	No	Moderate Risk	There is no national action plan on GBV prevention and response. However, There are action plans to address harmful traditional practices such as early marriage.
Is there at the national level GBV Working Group	Yes	Moderate Risk	There is national GBV sub-cluster co-lead by UNFPA/UNICEF and the Ministry of Women and Social Affairs. However, the sub-cluster mainly focuses on coordinating GBV prevention and response in emergency and conflict affected settings
Is there a national referral protocol for GBV Service Provision	Yes	Low Risk	
Does the project have the capacity to monitor the risks of harassment and gender-based violence throughout the scope and cycle of the project?	Yes	Low Risk	Yes, the project will take into account the Prevention Plan against Sexual Harassment and Abuse and Sexual Exploitation. Resources will be made available to the project.
Evaluation of Risk for Component 2	Substantial		

GBV Action Plan Matrix for Component Two

	Activity to Address SEA/SH risk	Steps to be taken	Time Lines	Responsible	Monitoring (Who will monitor)	Output indicators	Estimated Budget
1	Capacity building of the PIU on SEA / SH Responsibilities and Key Actions						
1.a	<p>Capacity building sessions for the PIU (Management/ leadership) on GBV, SEA/SH. The training is intended for management teams, committees/taskforces and managers responsible for the Component activities.</p> <p>Each training will be a Three -Days training on:</p> <ul style="list-style-type: none"> • Gender based violence (GBV), SEA and SH • Developing a comprehensive approach to Prevention of and Response to project related GBV, SEA and SH in the implementation of Component Two and the ELRP project • Build Scenarios, case studies and field experience relevant to the subject • Review of the Code of Conduct /disciplinary action for violation of CoC, • Roles and responsibilities of actors involved in the project, including coordination mechanisms internal to the project to ensure adequate attention to 	<ul style="list-style-type: none"> • To prepare for the training using the developed module and materials • The Contractors and consultants contracts to be reviewed • Human resource manuals and staff capacity to be assessed • Project code of conduct to be prepared • Conduct training for targeted audience • Develop a work plan on enhancing prevention and protection • To appoint an internal focal point in charge of reporting (who might include one in HR dept) 	<p>Quarter 1 for the initial training</p> <p>Once every quarter as a short term follow training which will include sharing of practical experiences</p>	<p>PIU</p> <p>Gender Specialist</p>	<p>Gender Specialist</p>	<ul style="list-style-type: none"> • Number of trainings conducted • Number of PIU (Management/leadership) members trained • Focal point identify 	

	<p>and monitoring of GBV, SEA and SH risks</p> <ul style="list-style-type: none"> • Internal GBV, SEA and SH case-reporting mechanism, accountability structures, and referral procedures within agencies • Community-based reporting of GBV, SEA cases related to project staff by community members • Services available/referral pathway. 						
1.b	<p>Ongoing Oversight Measures in the Project, and under that activity include ensuring that SEA and SH are regular agenda items on PIU meetings;</p>	<ul style="list-style-type: none"> • Ensure the Organized regular PIU meetings include: <ul style="list-style-type: none"> ○ SEA & SH agenda ○ Reports and updates ○ Follow up actions 	<p>Start in quarter one and continuous</p>	<p>PIU</p>	<p>Gender/G BV Specialist</p>	<ul style="list-style-type: none"> • Number of monitoring of project meetings held with SEA/SH as an agenda item • Percentage of cases/issues/concerns followed up 	
2	<i>Mapping out GBV/SEA prevention and response service providers</i>						
2.a	<p>Mapping of GBV Service providers will be undertaken in the project implementation woredas. The mapping exercise will include government social services, CBOs, NGOs, and other civil society organizations.</p> <p>Map woredas where the project is implemented for referral services for survivors of GBV, SEA and SH</p>	<ul style="list-style-type: none"> • Conduct field visits and or remote review (desk) to identify and map the existing services, gap analysis, entry points for survivor assistance, and local actors working on the prevention of and/or response to gender-based violence. • Towards achieving this, the following will be undertaken: 	<p>Within the first quarter from effectiveness</p>	<p>Gender Specialist</p>	<p>PIU</p>	<ul style="list-style-type: none"> • The Mapping Report 	

		<ul style="list-style-type: none"> ○ Conduct a desk review of GBV service providers in hosting woredas and communities. Including the prevention and response mechanism ○ Field visits ○ Stakeholder consultations ● Analyze the services for survivors available in all project locations and assess their quality as per standards, including health care, psychosocial support, police and legal/justice services 					
2.b	<p>Develop/Review and update a multi-sectoral GBV referral pathway(s) in line with the National systems and global standards</p> <p>The survivors will have a place to go and report. Where confidentiality can be done.</p>	<ul style="list-style-type: none"> ● Considering the mapped out GBV prevention and response service providers, a referral pathway for service providers will be developed/updated ● Disseminate the referral pathway/list to stakeholders including service providers 	<p>Within the first quarter of the kickoff of the work plan</p> <p>To be frequently updated and maintained throughout project implementation</p>	Gender Specialist	PIU	<ul style="list-style-type: none"> ● The referral pathway developed/updated ● The level of dissemination undertaken ● Information dissemination conducted 	

		<ul style="list-style-type: none"> • Information dissemination on existing GBV response services and the importance of timely reporting will be conducted 	on. Throughout the project period				
2.c	Capacity building of multi-sectoral GBV service providers on relevant GBV response topics. The capacity-building plan will be developed based on service mapping findings and an appropriate budget will be allocated.	<ul style="list-style-type: none"> • Develop a ToR for preparing a capacity building plan. • Allocate adequate resources and resource persons. • Conduct training for the service providers and other stakeholders as per the capacity building plan. 	Within the first quarter	Gender Specialist	PIU	<ul style="list-style-type: none"> • Capacity building plan developed (for service providers) 	
3	Capacity Building of Workers						
3.a	<p>Conduct GBV/SEA orientation training for project staff specifically in touch with the communities in implementation of component two. In line with the Good Practice Note recommendations, the training will cover the following topics:</p> <ol style="list-style-type: none"> 1. Defining Gender-Based Violence, its Forms, manifestations and Consequence 2. Highlights of the frameworks addressing SGBV 3. Principles of Reporting Gender-Based Violence 	<ul style="list-style-type: none"> • Conduct training for project staff • Retrain where appropriate during the implementation 	Throughout the project	Gender Specialist and the PIU	PIU	<ul style="list-style-type: none"> • Number of training conducted for project staff • Percentage of workers that have attended training. 	

	<p>4. Scenarios and field experience relevant to the subject</p> <p>5. The CoC and the laid down guidelines and possible disciplinary action for violation of CoC</p> <p>6. Roles and responsibilities of the key actors involved in the project,</p> <p>7. Case-reporting mechanism, accountability structures, and referral procedures within agencies</p> <p>8. Community members reporting processes on issues related to project staff</p> <p>9. Services available/referral pathway.</p> <p>10. GRM</p>						
4	Undertake Community Awareness Raising to Support Prevention of and Response To SEA & GBV Related to the Project						
4.a	<p>Community-awareness on the risks of sexual exploitation and abuse (SEA) & GBV. This focus will include:</p> <ul style="list-style-type: none"> • GBV • SEA • Reporting mechanisms and channels • Available services at the project implementation woredas, at regional and national levels • Explain rights and entitlements ensuring that people do not fail to report on GBV and SEA out of fear of losing much-needed material assistance. The awareness will primarily highlight as communities, they are entitled to receive and that their rights will not be affected by their potential complaints. 	<ul style="list-style-type: none"> • Develop a community engagement plan (including strategies to engage those in isolated locations) • Engage the administrative leadership, chiefs, elders, and women groups and focus on their level of knowledge on GBV, SEA, conduct awareness and sensitize the leaders • Identify and establish partnerships with existing CSO's • Collaborate with CSOs 	<p>Quarterly activity and to begin in the first quarter</p> <p>Ongoing throughout Project implementation period.</p>	<p>Gender Specialist</p> <p>PIU leadership</p> <p>CSOs</p>	<p>PIU</p>	<ul style="list-style-type: none"> • No. of engagements with the local government administrators • No of partnerships formed with CSOs • No. of forums conducted • No. of forums conducted with communities in isolated locations • No. of woredas reached 	

		<p>undertaking similar community forums and awareness raising with bid to concur on content and delivery of the messaging</p> <ul style="list-style-type: none"> • Develop a Community GBV/SEA sensitization program, material and messages • Conduct community sensitization 				<ul style="list-style-type: none"> • The kind of multiplier awareness sessions that would follow • The level of interest seen in prevention and protection of SEA 	
4.b	<p>In collaboration with Woreda Women and Social Affairs offices, provide targeted training for volunteer champions (women leaders, girls). Involve at least 5 champions per woreda; cluster them into groups of 5 woredas to have population of approx. 20-25 participants per training. To thus have 5 pieces of training for all the targeted woredas.</p> <p>The training to be for a two day period and focus on:</p> <ul style="list-style-type: none"> • Awareness – TOTs who can create awareness back at the community • To have community owner processes that can easily deal with the issue of potential gatekeepers and opinion shapers • Making use of existing community-relevant informal structures 	<ul style="list-style-type: none"> • Identifying and contacting the champions per woreda • Prepare for the training using the already developed module and materials • Conduct training • Share information, education and communication (IEC) materials for further dissemination • Develop champions / Stakeholder Engagement Plan for SEA related issues 	In the second month of the work plan	Gender Specialist	Local woman led CBO (or as will be agreed during the champion 's training)	<ul style="list-style-type: none"> • Number of champions trained • Stakeholder Implementation plan developed and implemented • Number of activities conducted by champions • Number of women, men, boys and girls reached by chamions led activities 	

	<p>The benefits for the champions is that:</p> <ul style="list-style-type: none"> • They will likely use the same language for ease of awareness • Champions will remain as a community resource ensuring sustainability • They provide a data base of those that can be reached to provide awareness eg on radio programme. 						
B	<p>Develop audience specific IEC/BCC materials and disseminate awareness materials for community engagements, awareness and information</p>	<ul style="list-style-type: none"> • Collect and select relevant and applicable existing materials on prevention & response to SEA. The material will enhance awareness on PSEA for staff as well as for communities • Dissemination be undertaken the target woredas 	<p>Within the first quarter of the kickoff of the work plan</p> <p>Dissemination will be conducted throughout the project period</p>	Gender Specialist	PIU	<ul style="list-style-type: none"> • Number and type of GBV/SEA IEC material gathered • Number of avenues that the dissemination has been effected 	
C	<p>Organize orientations campaigns in schools to mitigate risks of GBV against school girls. The focus will be</p> <ul style="list-style-type: none"> • GBV • Reporting mechanisms and channels • Available services at the project implementation woredas, at regional and national levels • Explain importance of timely reporting to access lifesaving GBV services in case of Rape/Sexual assault. 	<ul style="list-style-type: none"> • Identifying and contacting the schools in the targeted woredas • Prepare for the training using the already developed module and materials • Conduct training • Share information, education and communication (IEC) materials for further 	<p>Throughout the project period on regular basis</p>	ToT trained Woreda level champions	Gender/G BV Specialist	<ul style="list-style-type: none"> • Number of schools targeted by campaigns 	

	The training will be conducted by the champions (women & girls) who will participate in the ToT trainings.	dissemination					
6	<i>GBV/SEA Responsive Reporting GRM (Coordinating Team and the Grievance Response Management)</i>						
	<p>Review and input into the existing GRM.</p> <p>The intention is to have the project utilise common GRM that is purposed and responsive to GBV issues. This will include training GRM committee members on GBV guiding principles. This will ensure more effectiveness and without risk of a survivor moving through different systems.</p> <p>Relevant measures/procedures will be included in the GRM to address the special needs of people living in isolated locations</p> <p>The input will be into the GRM by the Social Impact Team, for specific GBV/SEA/SH procedures</p> <p>GBV reporting mechanism will multi-pronged: to enable survivor-centered, appropriate, adequate, sensitive, consensual and confidential service</p>	<ul style="list-style-type: none"> • Undertake internal review of the existing GRM for GBV/SEA mitigation responsiveness and where need be, input • Train GRM committee members on GBV guiding principles • Ensure GBV complaints are handled in safe and confidential manner • Inform employees and the community on how to report cases of GBV related to the project. • Inform on what constitutes of CoC breaches to the GRM, and how such cases are handled • Develop enhance where they already exist (and where feasible) mechanisms to hold accountable alleged perpetrators including 	Ongoing throughout Project implementation period.	Gender Specialist	Gender Specialist	<ul style="list-style-type: none"> • A GBV/SEA responsive and integrated GRM • No. of referrals of GBV incidents made 	

		possible disciplinary action for violation of the CoC					
7	Monitoring of SEA/ SH & GBV Incidences and or Reports: The monitoring will be towards assessing the status and performance in terms of compliance, emerging issues and proposing recommendations for improvement as the situation will present. The monitoring process will be objective, with no bias.						
	<p>Purposed and continuous monitoring of the cases reported or occurring in the respective communities.</p> <p>Comprehensive monitoring will be undertaken. This will enable supervision and verification that the project implementation meets the standards. This approach will strengthen monitoring and evaluation systems.</p> <p>The monitoring will be towards:</p> <ul style="list-style-type: none"> • Ensuring prompt, confidential response to SEA, SH & GBV matters • Securing requisite support to SEA, SH & GBV survivors • Supporting the GRM teams to adhere to rules around consent and confidentiality of the survivor • Ensuring vulnerable groups' safe access to services (livelihoods) 	<ul style="list-style-type: none"> • Develop monitoring tools • Undertake time-to-time assessment of the Referral pathway for effectiveness and vigilance to survivor-centered approach • Paying attention to Community/beneficiaries response and feedback • The monitoring will be on a continuous basis and the days can be applied on a need basis which will be from time to time be referenced from the guidance note 	Ongoing throughout Project implementation period.	PIU	Gender Specialist	<ul style="list-style-type: none"> • The swiftness in response to feedback received • The level and quality of services accorded to the survivors 	

8	Reporting						
	<p>Periodic Reports will be done</p> <p>Recommendations will be made, and proposals given towards enhancing the relevance, effectiveness and appropriateness of the response to SEA and SH</p>	<ul style="list-style-type: none"> • Periodic reports will be developed and shared with the PIU. Documented and recorded reports will be buttressed with the evidence of the findings and results of the activities. • The reports will focus on the prevention, protection and response mechanism, the appropriateness of handling the survivors and the areas of improvement where necessary 	<p>Ongoing throughout Project implementation period but at a minimum every 6 months</p>	<p>Gender Specialist</p>	<p>PIU</p>	<p>Periodic Reports</p>	