

Resilient Infrastructure for Adaptation and Vulnerability Reduction (RIVER)

**GENDER BASED VIOLENCE/ SEXUAL EXPLOITATION AND ABUSE/ SEXUAL
HARASSMENT (GBV/SEA/SH) RISK MITIGATION AND ACTION PLAN**

Local Government Engineering Department (LGED)

January 2022

List of Acronyms

BBS	Bangladesh Bureau of Statistics
BDHS	Bangladesh Demographic and Health Survey
C-ESMP	Contactors' Environmental and Social Management Plan
CEDAW	Convention on the Elimination of all forms of Discrimination Against Women
CoC	Code of Conduct
CSO	Civil Society Organization
DPD	Deputy Project Director
DPP	Development Project proposal
ESMP	Environmental and Social Management Plan
EOC	Emergency Operation Center
GBV	Gender based Violence
GIS	Geographic Information System
GRM	Grievance Redress Mechanism
GPN	Goop Practice Note
IA	Implementing Agency
IEC	Information Education and communication
IPF	Investment Project Financing
LGED	The Local Government Engineering Department
LGD	Local Government Division
LMP	Labor Management Plan
MoLGRD&C	Ministry of Local Government, Rural Development & Cooperatives
M&E	Monitoring and Evaluation
MCHs	Medical College Hospitals
MOWCA	Ministry of Women and Children Affairs
NGO	Non-Government Organization
NWDP	National Women's Development Policy
OCC	One stop crisis Center
PD	Project Director
PIU	Project Implementing Unit
QER	Quality Enhancement Review
SEA/SH	Sexual Exploitation and Abuse/ Sexual Harassment
SEP	Stakeholder Engagement Plan
SMC	School Management Committee
TTL	Task Team Lead
UDHR	Universal Declaration of Human Rights
UN	United Nations
UNFPA	United Nations Population Fund
VAW	Violence Against Women
WB	The World Bank

Table of Contents

GBV/SEA/SH Risks Assessment in the Project Areas	3
Capacity Assessment of the Implementing agencies	4
Recommended Actions to mitigate SEA/SH: GBV Action Plan	5
GBV/SEA/SH MITIGATION ACTION PLAN	8
Budget	13
Annexes	14
Annex 1: Country and Project Context.....	14
Annex 2: Legal and Institutional Environment for Safety of Women and Girls.....	16
Annex 3: Project Grievance Mechanism to address GBV/SEA/SH Allegations	18
Annex 4: Operating Procedures and Response Protocol for SEA/SH Allegations	19
Annex 5: Starting List for Mapping of GBV Service Providers	20

GBV/SEA/SH Risks Assessment in the Project Areas

The proposed activities of the project involve raising of community land, construction of shelters and community facilities, and connecting roads in flood-prone villages with medium civil works which can have adverse impacts on communities, in particular on women and girls can exacerbate the potential risk of GBV in different ways. Based on the Bank's GBV/SEA/SH Risk Assessment Tool for civil works investments and the assessment carried out, the project's GBV/SEA/SH risks are assessed as "moderate". An overview of country and project context of GBV prevalence is included under Annex 1, in order to understand the potential project induced risks. The social assessment has highlighted the following concerns related to women's vulnerability and potential project induced GBV risks.

- The project involves moderate construction work which may require hiring of skilled labor from outside of the project area. The project will hire mainly local labor for the civil works, but it will take place in school and close to other community institutions or pedestrian access that women and girls and children use for their daily activities. The proximity potentially increases the risk for inappropriate behavior, such as sexual harassment of women and girls and exploitative sexual relations with minors from the local community. If there will be need of skill labor influx, it will have impact on the local community to accommodate them in rural setting as well. The project with some influx of workers will increase the GBV/SEA/SH related risks may also potentially increase risks for forced marriage; such marriages might be seen as the best livelihood strategy for an adolescent girl.
- In addition of constructing flood shelters, community facilities, and connecting roads, the project also aims to mobilize community mobilizers that increase interface with project beneficiaries which will inevitably lead to greater mobility of peoples that could contribute to raising a number of social problems; namely, greater exposure to sexually transmitted diseases including HIV/AIDS due to influx of outsiders such as traders, business persons, skilled and unskilled migrant laborers, and goods transport workers. All of which may potentially lead to social tensions among the local communities as all the construction works very close to community settlement. The Project's SEA/SH risks assessment duly anticipates these likely negative impacts which could arise during the project implementation and even after.
- Flood shelters will be built to replace existing primary school buildings in poor condition in flood prone area which will be multipurpose, functioning primarily as primary schools. Additionally, the open land area of the school will be raised above the flood level by filling with suitable earth and compacting mechanically. This intervention will bring labor and other related people in the school premises which could increase protection risk of children specially for girls. If the construction work will take place during the school time it will be anticipated that the child protection will be a great concern. The labour influx inside the school premises could increase child marriage considering the present situation of child marriage after the covid in Bangladesh.
- The project sites are mostly located in rural and hard to reach areas. In general, there are GBV service providers working in the urban and peri-urban areas but not always in the rural areas or hard to reach flood affected areas where nor mal services are hard to access. However, there are qualified service providers working in the nearby sub district or districts level. Government initiatives such as one stop crisis center, nationwide hotlines under the Multi-

sectoral program by Ministry of Women's and Children Affairs exist and operating regionally, but not in all the project sites. They focus on a range of services such as immediate service, psychosocial counseling, legal support, transport facilities including the referral service. A preliminary list of service providers available in the subproject sites and districts of Nilpamari, Lalmonirhat, Kurigram, Rangpur, Gaibandha, Bogura, Pabna, Sirajganj, Rajbari, Faridpur, Gopalganj, Madaripur and Sunamganj, Habiganj is attached (see Annex-5). Service providers that continue to provide services to the survivors remotely during the COVID 19 situation are also included in the list. In addition, a list of existing national legal and institutional mechanisms for girls and children's safety is incorporated under Annex 2 for information.

- Police and hospital are the main entry points that link GBV survivors to other services. Police operate a nation-wide helpline (999). The helpline is dedicated for all types of complaints including GBV cases. Besides, there are model police stations situated in the nearby districts of the project sites (included in the mapping, see Annex 5). Model thana is designed to improve police-community engagement and create an environment that facilitate equitable access to justice particularly to women, girls and vulnerable groups. These model thana can be of use to respond any potential project induced GBV/SEA/SH cases during and after the project implementation stage. In addition to the model thana, police stations in the respective project sites have dedicated help desk for women and children and which can potentially be one of the key actors to address potential GBV/ SEA/SH cases. This desk is managed mostly by the women officers who are trained to handle cases of GBV.

Capacity Assessment of the Implementing agencies

The Local Government Engineering Department (LGED) will be responsible for implementing the project. The Department is a part of the Local Government Division (LGD) under the Ministry of Local Government, Rural Development & Cooperatives (MoLGRD&C). LGED is mandated with the planning and development of rural infrastructure which includes small-scale water resource infrastructure, rural roads, bridges, culverts and markets and has been the implementing agency for all Bank-financed multi-purpose disaster shelters. LGED will implement the project through a dedicated Dhaka-based PIU, headed by a Project Director (PD). The PD will be supported by a dedicated Deputy Project Director (DPD), Senior Assistant Engineer, Assistant Engineer as well as the associated technical and safeguard support staff. A majority of the implementation will be based on the district and upazila levels, where the associated LGED field officials (will act as the focal person(s) responsible for supervision and monitoring of work implementation in their respective districts and upazilas. The Project will have these LGED officials dedicated for the Project approved by the manpower committee of Ministry of Finance. To the extent possible, all staff will be expected to serve for the duration of the project in order to ensure consistent implementation of the project.

A Design and Supervision (D&S) Consultancy firm will be contracted to support the PIU in preparation of the detailed designs and bidding documents for the project interventions, as well as being the primarily responsible party for construction supervision at field level. For monitoring implementation and safeguards compliance, a Monitoring and Evaluation (M&E) firm will be engaged to assist LGED. The PIU support staff will comprise of experts in Environment and Social Safeguards, Gender,

Procurement and Financial Management, GIS and other areas of expertise as deemed necessary (by the PD/PIU). However, it's unlikely that the related experts have expertise of GBV.

Overall, the existing capacity of LGED to respond GBV/SEA/SH cases is weak. Furthermore, GBV response and prevention is not well integrated in government structure in Bangladesh which also will be a challenge to address GBV in this project. The PIU support staff comprised with gender and social safeguards but not sure whether have expertise GBV or not. The project construction work mostly is in rural and hard to reach area but the associated LGED field officials (will act as the focal person(s) responsible for supervision and monitoring of work implementation are based at District and upazila level. Considering the GBV trend in Bangladesh and lack of awareness among service provider it may be difficult to ensure a coordinated effort in addressing and monitoring SEA/SH within the project area from Upazila and district level LGED offices.

The project SEP includes a Grievance Redress Mechanism (GRM) for the project and the LMP also has developed a GRM for the labor. These GRMs have been designed to address complaints and concerns of project affected people and the labors. They contain multiple channels through which complaints can be raised as well as a timeframe and responsibility framework to solve and address those complaints through multiple tiers. For a moderate GBV/SEA/SH risk, GRM responsive to such risks is required. LGED requires capacity building supports for its existing experts, and supervision consultants on the overall GBV risk mitigation measures of the project as per the Bank's GPN. The PIU team will require the adequate skills and knowledge as well about potential SEA/SH risks and to effectively carry out their roles even after the Project closes.

Recommended Actions to mitigate SEA/SH: GBV Action Plan

The World Bank developed GBV Good Practice Note (GPN) and SEA/SH Risk Mitigation Good Practice Note to assist Task team identifying risks of GBV and SEA/SH, that can emerge in IPF with moderate civil works contracts and to advise implementing agencies accordingly on how to best manage such risks. Therefore, the purpose of this action plan is to identify the issues, stakeholders, possible service providers and assess their capacity that aid in accessing grievance redressal. The action plan will focus on some corresponding mitigation measures—sensitizing the communities and other stakeholders, strengthening the institutional capacities— to mitigate project related potential risk of GBV in the project affected population. A survivor-centric approach is followed all through, and survivors' care and providing access to different referral mechanisms are considered key aspects of this plan.

This action plan has addressed a list of recommended actions to address GBV/SEA/SH Risks in the Project as per the “Good Practice Note” published by the World Bank.

1. Capacity building: This action plan will focus on building capacity and sensitization of PIU/Implementing agency on the importance of GBV/SEA/SH related issues, to further build capacity of all project actors involved such as facilitators, contractors, SMCs. Overall, GBV expertise in Bangladesh is limited as the concept is new. For the moderate risk project, the

social specialist in the PIU will have experience on gender and GBV issues. Alternatively, a GBV consultant can be recruited. In addition, the Procurement Specialist and Environment Specialist from PIU will also require training

2. Consultations: The strategy includes stakeholder's consultation with the community people from the project sites including the primary schools to inform them properly about the potential GBV/SEA/SH risks, project activities including the channels available to seek grievance redressal through project related grievance mechanisms. LGED will re-examine the GBV risks and take appropriate follow up actions to manage those risks. Formal organizations such as NGOs, police, OCC, multi-sectoral project of government working to respond GBV, will participate in the consultation. Such consultation will also help building linkages with each other and prepare them for responding better to the GBV cases.
3. Contractor responsibilities: The capacity of contractors managing the GBV/SEA/SH risks is integral part of the action plan. Consequently, SEA/SH requirement and expectations will be incorporated in the bidding documents for contractors, and sub-contractors and the contractor's SEA/SH Accountability and Response Framework will be evaluated as part of bid's evaluation. IA will formulate code of conducts (CoC) for all the bidding documents which include provisions for addressing SEA/SH and prohibitions against sexual activity by the project staffs and workers without consent, and sexual relationship with minors under the age of 18. These provisions of CoC will be included in the job contracts of contractors, sub-contracts and even staffs of LGED. IA will make sure that the code of conduct is signed, trained and understood by all parties
4. Mapping: A mapping of GBV service providers at the divisional level was conducted previously. Taking that list as a starting point, a list of GBV response actors in the project sites will be completed, and if needed local groups will be added in the existing list. The list of the service providers includes relevant government agencies/facilities and as well also takes into account provision of services in Covid 19-like emergency situations. GBV survivors including SEA/SH survivors will be referred to the selected service providers to avail the services, in case of need. The capacity to provide survivor-centered services will be assessed while assessing the quality of the service providers. Based on that assessment, a shorter list of two/three service providers working on the ground and suitable to keep on board will be prepared. The selection of the service provider and the role of service provider will be decided upon following the discussion between PIU and TTL. See Annex 5.¹
5. Grievance Redress Mechanism: Review and assess the effectiveness of the existing project-specific Grievance Redress Mechanism and sensitize the existing GRC on SEA/SH handling procedures. LGED's existing project GRM will be strengthened to make it responsive to

¹ Please see UNFPA report as well. Sharmin, N. 2020. Mapping of the Essential Services for GBV Survivors. Dhaka: UNFPA Bangladesh

GBV/SEA/SH. PIU will set up the GRM based on local resources and mechanism on GBV response and WB guiding model 1. Under this model, SEA/SH allegations can be reported, just like any other project-related grievance, using a regular project-level GM channel (Annex 3). In doing so, training of the responsible officials in the PIU will be provided on how to receive and handle SEA/SH including GBV complaints. The Social Specialist (with GBV/SEA/SH experience), supervision consultants, contractors and PIU staffs will also be included in these trainings which will allow them to determine follow up modalities. To make the GRM more responsive to SEA/SH and GBV issues, an information sharing protocol with GBV service providers will be developed so that survivor related information is carefully managed, and confidentiality is maintained. In addition, awareness campaign and development of IEC materials on GRM will be done for the communities and stakeholders using easily accessible methods. The communication materials will be disseminated among the communities and stakeholders through appropriate channels and media including LGED's website and use of social media

6. Accountability and Response Framework to deal with the GBV/SEA/SH cases: The framework will detail out how allegations of SEA/SH will be handled, procedures to report SEA/SH allegations internally, a referral pathway to refer survivors to appropriate service providers, and procedures of confidentiality requirements dealing with the cases (see Annex 4).
7. Periodic monitoring and evaluation of the implementation plan by the IA based on the Action Plan Matrix below.

GBV/SEA/SH MITIGATION ACTION PLAN

S/N	Action to address risk	Activities	Timing for action	Who is responsible for action	Indicator	Ongoing risk management
1.	Sensitization of IA addressing GBV/SEA/SH risk on project and the mechanism of implementation	<ul style="list-style-type: none"> • Consultation with PIU • Training/orientation session carried out to sensitize PIU on importance of addressing GBV/SEA/SH risks 	Preparation and implementation	Task Team	<ul style="list-style-type: none"> • PIU and project staff sensitized on the GBV/SEA/SH risk factors in the project areas and trained on how to prevent and respond to GBV/SEA/SH 	<ul style="list-style-type: none"> • Task team to monitor and provide additional guidance as necessary
2.	ESF-related: Have GBV risks adequately reflected in all safeguard's instruments (i.e., Project ESMP, C-ESMP)—particularly as part of the assessment in the ESA and integrated in ESF activities. Include the GBV mapping in these instruments. Update as needed during implementation.	<p>Consider GBV risk in all safeguard's documents</p> <p>Include GBV risk issues in consultation agenda</p> <p>Incorporate feedback in project design</p>	<p>Preparation Implementation (before civil works commence).</p> <p>In line with SEP hold Consultations need to be continuous throughout the project cycle, not just during preparation.</p>	<p>PIU for social assessment and ESMP.</p> <p>Contractor for C-ESMP</p>	<p>GBV is included in all safeguard's documents</p> <p>Feedback from community are address in project design and activity</p>	<ul style="list-style-type: none"> • Ongoing review during implementation support missions. • Update project ESMP and Contractor's ESMP (C-ESMP) if risk situation changes. • Monitoring of implementation of Stakeholder Engagement Plan. • Ongoing consultations, particularly when C-ESMP is updated
3.	Finalize the GBV/SEA/SH Action Plan including the Accountability and Response Framework as part of the ESMP.	<p>Finalize the draft GBV/SEA/SH Action Plan</p> <p>The contractor/consultant's inputs and response to these</p>	Before civil works commences	IA (Social Specialist with GBV/Gender experience or	GBV action plan developed	<ul style="list-style-type: none"> • Ongoing review during implementation support missions. • Update project ESMP if risk situation changes.

		requirements will be required to be reflected in their C-ESMP.		Gender consultant)		
4.	Establish and strengthen an effective GRM that can respond to GBV/SEA/SH cases based on the existing framework (using Model 1 of GPN	<ul style="list-style-type: none"> • Map GBV service providers or response actors in project areas building on the starting list shared by World Bank available for Gaibandha, Nilfamari, Sunamgunj districts • PIU to disseminate the information • Conduct a deeper quality assessment of service providers such as success rate, response of SP, time taken to resolve, reputation within the UN agencies, and etc. • Train personnel to operate GRM i.e., proper documentation for complaint registration and management; and confidential reporting with safe and ethical documenting of SEA/SH cases. • Inform community and Primary schools about GRM • Provide appropriate referral to complainants • Develop Accountability and Response Framework (Annex 4) and a referral process flowchart to respond to cases 	Prior to contractor mobilizing.	IA, but discussed and agreed upon with the Task Team.	<ul style="list-style-type: none"> • Identified organizations working in the project area. • The mapping incorporates the quality assessment of the service providers. • Referral pathway established • Directory of organizations 	Ongoing monitoring and reporting on GRM to verify it is working as intended.

5.	Codes of Conduct signed and understood	<ul style="list-style-type: none"> • Develop the CoC for two groups of project actors -- laborers and community facilitators and volunteers. • Ensure requirements in CoCs are clearly understood by those signing. • Have CoCs signed by all those with a physical presence at the project site. • Train project-related staff on the behavior obligations under the CoCs. • Disseminate CoCs (including visual illustrations) and discuss with employees and surrounding communities. 	Initiated prior to contractor mobilization and continued during implementation	Contractor, Consultant, IA.	<ul style="list-style-type: none"> • Number of project-related staff and workers trained and oriented on CoC. • Number of people who signed CoCs 	<ul style="list-style-type: none"> • Review of GBV risks during project supervision (e.g., Mid-term Review) to assess any changes in risk. • Supervision consultant reporting that CoCs are signed and that workers have been trained and understand their obligations.² • Monitoring of GRM for GBV complaints. Discussion at public consultations.
	Community awareness raising and trainings for all actors involved in the project on GBV/SEA/SH	<ul style="list-style-type: none"> • Training for Project workers/actors (laborers, community facilitators/volunteer) • Training/awareness building for local community, Primary school SMC members on GBV/SEA/SH 	Implementation	IA, Contractors, Consultants	<ul style="list-style-type: none"> • Number of project worker trained • Number of Community people trained 	• Ongoing reporting
6.	Procurement: Clearly define the GBV/SEA/SH requirements and expectations in the bid documents and evaluate contractor's capacity. Based on the project's needs, the Bank's Standard Procurement Documents (SPDs), and the IA's policies and goals, define the requirements to be included in the bidding	<ul style="list-style-type: none"> • Formulate and adopt GBV informed bidding document. • Inform the contractors and provide orientation • Evaluate contractor's ability to meet project's SEA/SH prevention and response requirement prior to finalize the contract. • Evaluate contractor's CoC 	Procurement	IA	<ul style="list-style-type: none"> • SEA/SH requirement and expectation are adapted in bid document. 	<i>Review by Task Team</i>

² Civil works supervision consultant's monthly reports should confirm all persons with physical presence at the project site have signed a CoC and been trained.

	documents for a CoC which addresses GBV.					
7.	Review C-ESMP to verify that appropriate mitigation actions are included	<ul style="list-style-type: none"> • Review C- ESMP • Address gap if any 	Implementati on	PIU	C-ESMO included GBV mitigation measures	<i>Reviewed by Task Team, WB</i>
8.	Implement appropriate project-level activities to reduce SEA/SH risks in construction site prior to civil works commencing	<ul style="list-style-type: none"> • Have separate, safe and easily accessible facilities for women and men working on the site. Locker rooms and/or latrines should be located in separate areas, well-lit and include the ability to be locked from the inside. • Visibly display signs around the project site (if applicable) that signal to workers and the community that the project site is an area where GBV is prohibited. • As appropriate, public spaces around the project grounds should be well-lit 	Prior to works commencing	Contractor/ Supervision Consultant Task Team	Documentation of measures taken to reduce GBV risks	<ul style="list-style-type: none"> • Ongoing reporting. • Reviews during implementation support missions.
9.	M&E Review GRM processes to ensure it receives and processes complaints to ensure that the protocols are being followed in a timely manner, referring complaints to an established mechanism to review and address GBV complaints.	<ul style="list-style-type: none"> • Review the GRM mechanism • Addressing gap if any 	Implementati on	Task Team. IA	<ul style="list-style-type: none"> • GRM mechanism reviewed and addressed the gap 	<ul style="list-style-type: none"> • Ongoing reporting. • Monitoring of complaints and their resolution.
10.	M&E and reporting of GBV/SEA/SH action plan	<ul style="list-style-type: none"> • Undertake regular M&E of progress on GBV activities, including reassessment of risks as appropriate. • Conduct M&E field visits. 	Implementati on	IA, Contractors, Consultants.	<ul style="list-style-type: none"> • Successful implementation of SEA/SH Action Plan (Y/N). • Quarterly report 	<ul style="list-style-type: none"> • Monitoring of GRM. • Ongoing reporting.

		<ul style="list-style-type: none">• Review quarterly the action plan and progress against indicators listed• Provide quarterly report				
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Budget

In order to implement this action plan, LGED requires mobilizing resources and commensurate budget allocation in the DPP. The revision of DPP is not considered as a pragmatic step because of the regulatory, administrative and procedural difficulties. Instead of revising DPP, IA will mobilize resources from alternative sources (such as contingency budget in the DPP or the contractor's provisions for implementation of CoC and GBV risks). The budget provided below, thus, reflects a pragmatic compromise to effectively address the project's GBV/SEA/SH risks management as the Bank's GPN.

<u>List of Item</u>	<u>Amount</u>
1. Training and orientation/Awareness	1,400,000
2. Develop Communication materials	700,000
3. Information dissemination	700,000
4. GBV Grievance Management	300,000
5. Consultations with the communities/stakeholders	700,000
6. Referral services	1,000,000
7. Mapping	250,000
Total Budget Amount:	5,050,000
(Five million and fifty thousand BDT only)	
USD 60,000	

Annexes

Annex 1: Country and Project Context

Country Context:

GBV is the most pervasive form of human rights violation that women and girls are regularly facing in Bangladesh. The frequency and severity of GBV varies across the country, but the negative impact it has on individuals and on families is universal and has direct links to overall development of Bangladesh. Violence against women (VAW) is one type of GBV which is often rooted in the gender inequalities and harmful gender norms. Report on Violence against Women (VAW) Survey 2015 jointly conducted by the Bangladesh Bureau of Statistics (BBS) and UNFPA found that 73% of ever married women in Bangladesh have experienced any kind of violence by their current husband, 55% reported any type of violence in the past 12 months, and 50% reported physical violence in their lifetime. More than 10 million Bangladeshi women experience physical or sexual violence every year. The worst manifestation or existing forms of GBV is child marriage which is widely prevalent in the country. According to BDHS 2014, about 59 percent of women aged 20-24 marry before they turn 18. Child marriage puts girls at particular risk of sexual, physical and psychological violence throughout their lives, stated the participants.

Project Context:

The Project interventions aimed to Resilient Flood Shelters and Community Infrastructure (component 1); Strengthening Capacity for Disaster Preparedness and Response and Technical Assistance (component 2); Project Management, Design and Supervision, Monitoring and Evaluation (component 3) Under component 1 project is funding for land raising and construction of climate-resilient flood shelters in targeted flood-prone villages in non-coastal 14 districts, installation of lightning protection systems, construction and/or rehabilitation of associated climate resilient shelter connecting and community roads, and resilient infrastructure as identified by the community including climate resilient culverts and bridges, repair, rehabilitation and construction of rural markets, repair and rehabilitation of rubber dams, repair and rehabilitation of jetties, and installation of solar powered street lights. In component 2 This component will finance goods and services to increase the capacity of LGED and communities to plan, manage, and recovery from floods, and strategic studies to increase long-term resilience. To enhance the capacity of LGED, these include setting up contingency planning for emergency preparedness and evacuations, updating the shelter database, improving the disaster loss and damage assessments and reporting system, and establishing one Emergency Operation Center (EOC) in a district as a pilot. To enhance the capacity of communities, activities include community risk mapping, training of School Management Committees (SMCs) on shelter management and basic competencies to improve health and safety during floods, updating and training on community operation and maintenance guidelines, and behavioral change communication on basic health and nutrition as well as GBV prevention and response activities. Component 3 will support the Government in implementing the project, and in coordinating all project related activities, monitoring, technical assistance, and training. It will include: (i) establishment of a Project Implementation Unit (PIU) within the Local Government Engineering Department, and consultancy and technical assistance for

construction detailed design, procurement support, and construction supervision, preparation and implementation of safeguard instruments; (ii) capacity development of the PIU and communities in participatory planning and investment; (iii) monitoring and evaluation; and (iv) technical assistance and training in such areas as disaster management and preparedness, construction, contract management, financial management, preparation of environmental and social assessments, and preparation of safeguard instruments. It will also provide resources for strengthening the flood preparedness and management program. This action plan, thus, is developed for all the three components of the project.

The project activities involve moderate level civil works, requiring skilled and semi-skilled workers, who are likely to be recruited from inside or outside of the local communities. However, most of the major civil construction works will be located in rural areas, such as in schools for flood shelter. The shelter and other community facilities under Component 1 will mostly be located in rural setting but the overall volume of civil works will be moderate level. The project's RPF clarifies the terms and conditions for such a scenario and in all cases, don't foresee any major labor influx. The risk rating for GBV is thus, made 'moderate' considering the overall aspect of the projects, the civil constructions and potential labor influx. In component 2 the action includes enhance the capacity of community, community risk mapping, training of School Management Committees (SMCs) on shelter management which have engagement of different project worker and officials inside community which could increase risk of GBV/SEA. This GBV/SEA/SH action plan is prepared accordingly to respond the related risks and about how to best manage the project induced risks.

The prevalence of GBV in the project sites is not so different from the overall country situation. GBV in the form of sexual harassment is the most pervasive form of human rights violation that women and girls are regularly facing in Nilpamari, Lalmonirhat, Kurigram, Rangpur, Gaibandha, Bogura, Pabna, Sirajganj, Rajbari, Faridpur, Gopalganj, Madaripur and Sunamganj, Habiganj. Report on Violence against Women (VAW) Survey 2015 jointly conducted by the Bangladesh Bureau of Statistics (BBS) and UNFPA found that these districts are also prevalence to gender based violence. Bangladesh has the highest prevalence of child marriage in South Asia, and is among the 10 countries worldwide with the highest levels³. The risk of child marriage is influenced by certain background characteristic like residing in rural areas and to live in poorer households specially in disaster prone areas. Among the country's entire population of girls and women, 38 million married before the age of 18; of those, 13 million married before age 15. Among them from Sylhet 2 million, from Dhaka 9 million, from Rangpur 4 million and from Rajshahi 6 million⁴ where the project districts are located.

³ <https://reliefweb.int/report/bangladesh/ending-child-marriage-profile-progress-bangladesh>

⁴ <https://reliefweb.int/report/bangladesh/ending-child-marriage-profile-progress-bangladesh>

Annex 2: Legal and Institutional Environment for Safety of Women and Girls

Bangladesh is party to international human rights instruments including Universal Declaration of Human Rights (UDHR) in 1948, the International Covenant on Economic, Social and Cultural Rights, 1966, the International Covenant on Civil and Political Rights, 1966, the Second Optional Protocol to the International Covenant on Civil and Political Rights, 1989, and the Convention on the Elimination of all forms of Discrimination Against Women (CEDAW), 1979. By ratifying these conventions, the Government of Bangladesh has committed to guaranteeing equality to both men and women in all spheres of their lives, which entails ensuring that they are not subject to sexual harassment.

The government has enacted a number of laws and policies to protect women from such violence. The policies, laws and acts are:

- The Criminal Procedure Code, 1889
- The Penal Code 1860
- The Evidence Act, 1972
- Child Marriage Restraint Act 1929
- Citizenship Act 1951 (Amended 2009)
- Muslim Family Laws Ordinance 1961
- Dowry Prohibition Act 1980
- Immigration Ordinance 1982
- Family Court Ordinance 1985
- Women and Children Repression Prevention Act 2000 (2003)
- Acid Crime Prevention Act, 2002
- Acid Control Act 2002
- The Bangladesh Labour Act 2006
- Domestic Violence (Prevention & Protection) Act 2010
- Human Trafficking Deterrence and Suppression Act, 2012
- The Pornography Control Act, 2012
- The Hindu Marriage Registration Act 2012
- the National Women's Development Policy 2011

A nation-wide Multi-Sectoral Program⁵ on Violence against Women is being implemented by the Ministry of Women and Children Affairs, Government of Bangladesh, with the funding support from Government of Denmark. The project is being carried out in collaboration with the Ministry of Law, Justice and Parliamentary Affairs, Ministry of Information, Ministry of Social Welfare, Ministry of Home Affairs, Ministry of Health and Family Welfare, Ministry of Education, Ministry of Religious Affairs, Ministry of Youth and Sports and Ministry of Local Government, Rural Development and Cooperative. A National Centre on Gender Based Violence has been established at the Department of Women Affairs Building of the Ministry of Women and Children Affairs (MOWCA).

One of the significant components of the program is the OCC (One Stop Crisis Centre) in the Medical College Hospitals (MCHs). The OCCs provides health care, police assistance, DNA test, social services, legal assistance, psychological counseling and shelter service etc. Training module for combating VAW

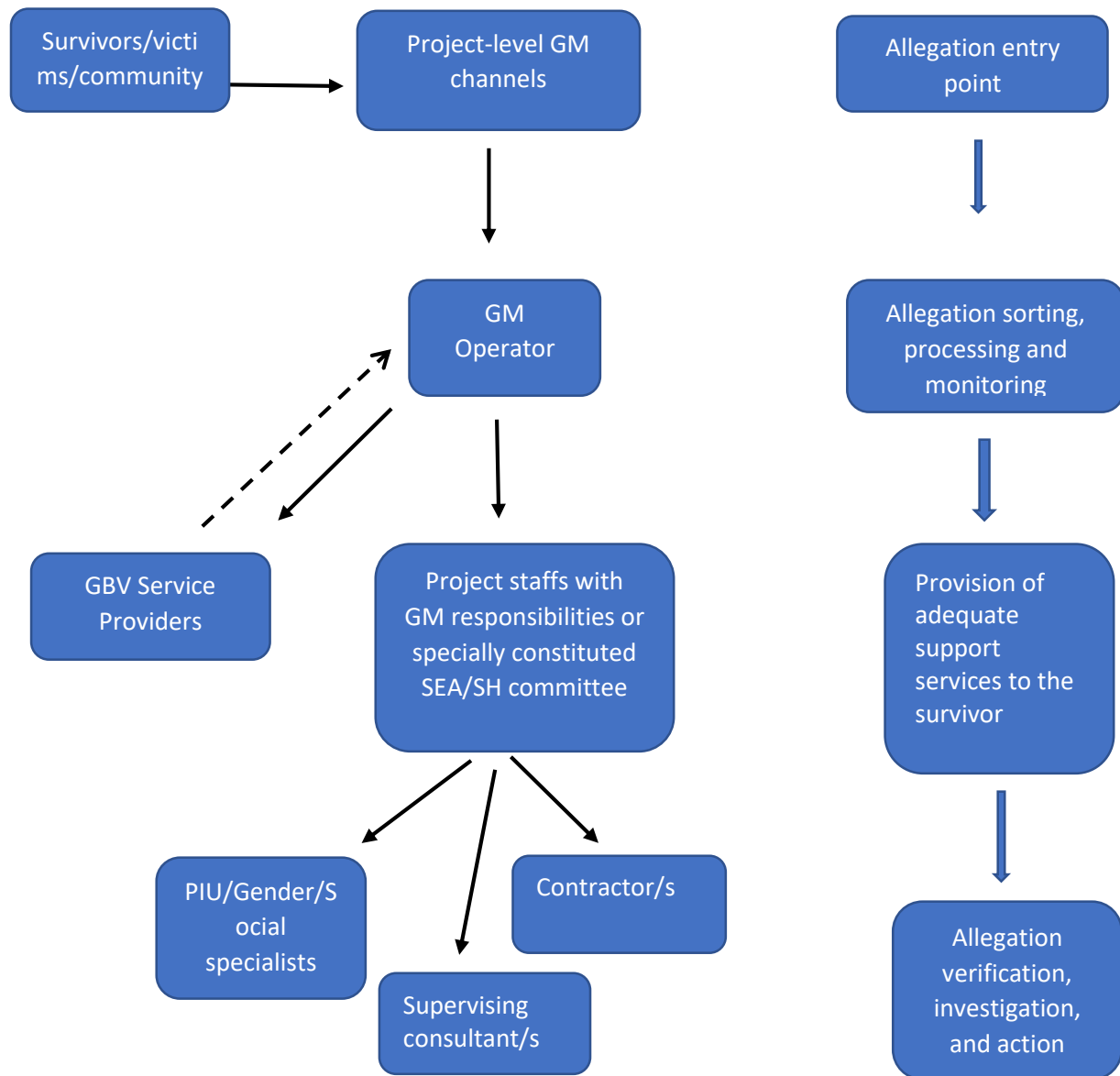
⁵Website of Multi Sectoral Project; www.msppaw.gov.bd

developed for OCC staffs, teacher, students, health assistant, family planning officers and other professions. The lists of the OCCs operating regionally around the project sites are included in the list of service providers.

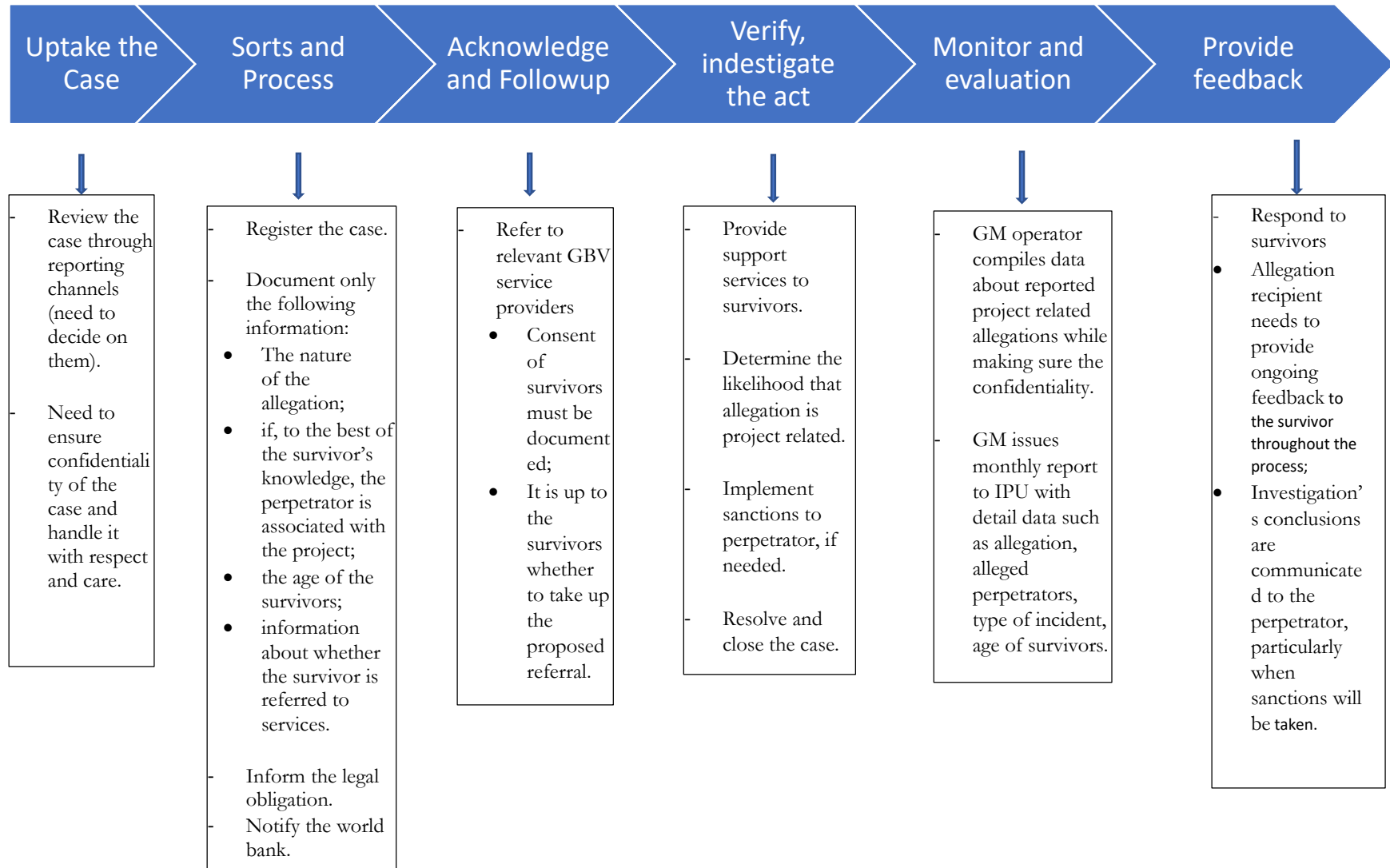
In addition, there are few nationwide hotlines maintained by the Ministry of Women and Children Affairs dedicated for reporting and seeking remedies for GVB cases including SEA/SH (list of those hotlines are included in the mapping of service providers). There is also a ‘model thana’ program run by the Ministry of Home, under which each of the thana has a ‘help desk’ dedicated for both women and minors for seeking help including GBV.

The Government of Bangladesh has taken positive steps towards the empowerment of women, including through the National Women’s Development Policy (NWDP), 2011 that seeks to reduce violence; eliminate discrimination; increase access to education, health and employment; and address the special needs of older women, women with disabilities and women from indigenous and marginalized communities.

Annex 3: Project Grievance Mechanism to address GBV/SEA/SH Allegations



Annex 4: Operating Procedures and Response Protocol for SEA/SH Allegations



Annex 5: Starting List for Mapping of GBV Service Providers

(Attached as a separate Excel file)